



has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the District of Delaware, dated February 29, 2012*. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2), and the Settlement Trust consents pursuant to rule 9013-1(f) of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware (the “Local Bankruptcy Rules”) to the entry of a final order by the Court in connection with this Objection to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or judgments in connection herewith consistent with Article III of the United States Constitution.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory bases for the relief requested in this Objection are section 502(b) of title 11 of the United States Code (the “Bankruptcy Code”), rules 3001, 3003, and 3007 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Local Bankruptcy Rule 3007-1.

#### **Relief Requested**

4. By this Objection, the Settlement Trust seeks entry of the Order disallowing each of the Claims in their entirety. Each Claim primarily relates to a claim that is a cross debtor duplicate, is an exact duplicate, was late filed, and was filed with insufficient supporting documentation to substantiate the Claim.

5. In addition, the Settlement Trust seeks to authorize the Claims Agent to expunge each of the Claims on the Claims Register in accordance with the Order. The Settlement Trust intends to use the form of notice previously approved by the Court [D.I. 2168 at Exhibit 1] to provide notice of the Objection to each claimant holding a Claim.

6. This Objection complies in all respects with Local Bankruptcy Rule 3007-1, as modified by the Court's March 24, 2017 Order [D.I. 2168].

### **Background**

7. On September 16, 2015 (the "Petition Date"), each of the Debtors filed a voluntary petition with the Court under the Bankruptcy Code. The Court has entered a final order for joint administration of these chapter 11 cases [D.I. 70]. The Office of the United States Trustee for the District of Delaware (the "U.S. Trustee") formed an official committee of unsecured creditors of Samson Resources Corporation on September 30, 2015 [D.I. 129]. Further information regarding the Debtor's business operations and capital structure is set forth in the declaration of Philip Cook in support of the Debtors' first day motions [D.I. 2].

8. On October 15, 2015, the Debtors filed their schedules of assets and liabilities (the "Schedules") and statements of financial affairs ("Statements" and together, with the Schedules, the "Schedules and Statements") [D.I. 201–218]. On June 29, 2016, the Debtors filed certain amended Schedules and Statements [D.I. 1108–1118].

9. On October 16, 2015, the Court entered an order (the "Bar Date Order") establishing November 20, 2015, at 5:00 p.m. (prevailing Eastern Time) (the "Bar Date") as the final date and time for non-government claimants holding or asserting a claim against the Debtors arising on or before the Petition Date to file proofs of claim in these chapter 11 cases and approving the form and manner of notice of the Claims Bar Date [D.I. 224].<sup>2</sup>

10. Written notice of the Bar Date was mailed to, among others, all known creditors and other known holders of claims against the Debtors as of the date of entry of the Bar Date

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<sup>2</sup> The Bar Date Order also established March 14, 2016, at 5:00 p.m. as the final date and time for all governmental units (as defined in section 101(27) of the Bankruptcy Code) holding or asserting a claim against the Debtors, including claims for unpaid taxes, arising on or before the Petition Date to file proofs of claim in these chapter 11 cases (the "Governmental Bar Date"), which deadline was subsequently extended as to certain governmental

Order, including all entities listed in the Schedules as holding claims against the Debtors, and to all parties who had filed requests for notices under Bankruptcy Rule 2002 as of the date of the Bar Date Order. In addition to mailing such actual notice, the Debtors also published notice of the Bar Date in the national edition of *The New York Times* [D.I. 467].

11. To date, over 3,000 proofs of claim have been filed in these chapter 11 cases, as recorded on the Claims Register.

### **Basis for Objection**

12. Section 502(a) of the Bankruptcy Code provides that “[a] claim or interest, proof of which is filed under section 501 of this title, is deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). The burden of proof for determining the validity of Claims rests on different parties at different stages of the objection process. As explained by the United States Court of Appeals for the Third Circuit:

The burden of proof for claims brought in the bankruptcy court under 11 U.S.C.A. § 502(a) rests on different parties at different times. Initially, the claimant must allege facts sufficient to support the claim. If the averments in his filed claim meet this standard of sufficiency, it is ‘prima facie’ valid [citations omitted]. In other words, a claim that alleges facts sufficient to support legal liability to the claimant satisfies the claimants’ initial obligation to go forward. The burden of going forward then shifts to the objector to produce evidence sufficient to negate the *prima facie* validity of the filed claim. . . . In practice, the objector must produce evidence which, if believed, would refute at least one of the allegations that is essential to the claim’s legal sufficiency. If the objector produces sufficient evidence to negate one or more of the sworn facts in the proof of claim, the burden reverts to the claimant to prove the validity of the claim by a preponderance of the evidence.

*In re Allegheny Int’l Inc.*, 954 F.2d 167, 173–74 (3d. Cir. 1992) (citation omitted). Once the prima facie validity of a claim is rebutted, “it is for the claimant to prove his claim, not for the

objector to disprove it.” *In re Kahn*, 114 B.R. 40, 44 (Bankr. S.D.N.Y. 1990) (citations omitted).

13. This Objection is filed pursuant to section 502(b) of the Bankruptcy Code, which provides, in pertinent part:

[I]f such objection to a claim is made, the court, after notice and a hearing, shall determine the amount of such claim in lawful currency of the United States as of the date of the filing of the petition, and shall allow such claim in such amount, except to the extent that—

(1) such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law for a reason other than because such claim is contingent or unmatured . . . .

11 U.S.C § 502(b)(1)

14. Further, the Settlement Trust has relied on the Declaration of Jeremy Leath, attached as **Exhibit 2**, in submitting this Objection.

**I. Cross Debtor Duplicate Claims**

15. The Claims listed on **Exhibit A** to **Exhibit 1** are claims in which claimants filed an exact duplicate of a Claim improperly against more than one debtor. These Claims should be disallowed and expunged because claimants should not be paid more than once and expungement will reflect a more accurate claims register. *See, generally, In re Moravian Associates, L.P.*, 2010 WL 2169495, at \*1 (Bank. E.D. Pa. May 26, 2010).

16. As a result, the Settlement Trust objects to the Claims listed on **Exhibit A** and respectfully requests entry of the Order disallowing in full and expunging the Claims listed on **Exhibit A**.

**II. Duplicate Claims**

17. The Claims listed on **Exhibit B** to **Exhibit 1** are Claims in which claimants filed an exact duplicate against the same Debtor. These Claims should be disallowed and expunged

because claimants should not be paid more than once and expungement will reflect a more accurate claims register. *See, generally, In re Ultra Stores, Inc.*, 2009 WL 6765351, at \*1 (Bank. S.D.N.Y. Dec. 17, 2009).

18. As a result, the Settlement Trust objects to the Claims listed on **Exhibit B** and respectfully requests entry of the Order disallowing in full and expunging the Claims listed on **Exhibit B**.

### **III. Late Filed Claims**

19. The Claims listed on **Exhibit C** to **Exhibit 1** appear to have been filed after the Bar Date. Pursuant to the Bar Date Order, all proofs of claims were to be filed by the Bar Date. It does not appear that any of these Claims were amendments to timely filed claims. The Claims should be disallowed and expunged because they are legally dead. *In re Trans World Airlines, Inc.*, 96 F.3d 687, 690 (3d Cir. 1996).

20. As a result, the Settlement Trust objects to the Claims listed on **Exhibit C** and respectfully requests entry of the Order disallowing in full and expunging the Claims listed on **Exhibit C**.

### **IV. Insufficient Documentation Claims**

21. The Claim listed on **Exhibit D** to **Exhibit 1** has been filed without any documentation to substantiate the proof of claim. As explained in *In re Kincaid*, 388 B.R. 610, 614 (Bank. E.D. Pa. 2008):

The law is well settled that failure to attach supporting documentation as required by a rule of procedure is not grounds for disallowance of a claim as §502(b) supplies the exclusive basis for claim disallowance. Rather where the proof of claim does not adhere to the requirements of Rule 3001 by providing the facts and documents necessary to support the claim, it is not entitled to the presumption of prima facie validity.

22. Absent the application of the presumption, the burden of going forward and

proving the Claim by a preponderance of the evidence remains on the claimant. *In re Porter*, 374 B.R. 471, 483 (Bankr. D. Conn.2007). Without sufficient information or documentation to permit reconciliation of the proof of claim, the Insufficient Documentation Claim fails to satisfy the requirements for a proof of claim. As a result, the Settlement Trust respectfully requests that, absent a further showing of documentation by the claimant by the objection deadline, the Court enter the Order disallowing in full and expunging the Claim listed on **Exhibit D**.

#### **SEPARATE CONTESTED MATTER**

23. To the extent that a response is filed regarding any Claim listed in the Objection and the Settlement Trust is unable to resolve the response, each such Claim, and the objection by the Settlement Trust to each such Claim asserted herein, shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. Any order entered by the Court regarding the Objection shall be deemed a separate order with respect to each Claim.

#### **RESPONSES TO OMNIBUS OBJECTION**

24. To contest this Objection, a claimant must file and serve a written response to this Objection so that it is received no later than 4:00 p.m., prevailing Eastern Time, on **August 8, 2018** (the “Response Deadline”). Every response must be filed with the Office of the Clerk of the United States Bankruptcy Court for the District of Delaware: 824 Market Street, Wilmington, Delaware 19801, and served upon the following entities, so that the response is received no later than the Response Deadline at the following addresses:

**Settlement Trust**  
FARNAN LLP  
Attn: Michael J. Farnan  
919 North Market Street, 12th Floor  
Wilmington, DE 19801  
(302) 777-0300  
(302) 777-0301  
mfarnan@farnanlaw.com

WHITE & CASE LLP  
Attn: Thomas E Lauria  
200 South Biscayne Blvd.  
Miami, FL 33131-2352  
(305) 371-2700  
tlauria@whitecase.com

WHITE & CASE LLP  
Attn: Michele J. Meises  
1221 Avenue of the Americas  
New York, NY 10020-1095  
(212) 819-8200  
michele.meises@whitecase.com

**Reorganized Debtor**

RICHARDS, LAYTON & FINGER, P.A.  
Attn: John H. Knight  
One Rodney Square, 920 North King Street  
Wilmington, Delaware 19801  
Telephone: (302) 651-7700  
Facsimile: (302) 651-7701  
knight@rlf.com

WILLKIE FARR & GALLAGHER LLP  
Attn: Ana Alfonso  
787 Seventh Avenue  
New York, New York 10019-6099  
Telephone: (212) 728-8000  
Facsimile: (212) 728-8111  
aalfonso@willkie.com

**Office of the United States Trustee**

Attn: David Buchbinder  
844 King Street, Suite 2207  
Wilmington, DE 19801  
david.buchbinder@usdoj.gov

25. Every response to this Objection must contain at a minimum the following information:

- a) A caption setting forth the name of the claimant, his or her Claim number, and a description of the basis for the amount and validity of the Claim;
- b) The specific factual basis and supporting legal argument upon which the claimant will rely in opposing this Objection;



c) Any supporting documentation, to the extent it was not included with the proof of Claim previously filed, upon which the party will rely to support the basis for and amounts asserted in the proof of claim; and

d) The name, address, telephone number, and email address of the person(s) (which may be the claimant or the claimant's legal representative) with whom counsel for the Settlement Trust should communicate with respect to the Claim or the objection and who possesses authority to reconcile, settle, or otherwise resolve this Objection to the disputed Claim on behalf of the claimant.

26. If a claimant fails to file and serve a timely response by the Response Deadline, the Settlement Trust may present to the Court an appropriate order disallowing and expunging the Claim, without further notice to the claimant or a hearing.

27. Consistent with Local Rule 9006-1(d), the Settlement Trust may, at its option, file and serve a reply to a response no later than 4:00 p.m., prevailing Eastern Time, one (1) day prior to the deadline for filing the agenda on any hearing to consider the Objection.

#### **RESERVATION OF RIGHTS**

28. The Settlement Trust hereby reserves the right to object in the future to any of the proofs of claim listed in this Objection or on the exhibits attached hereto on any ground, and to amend, modify, and/or supplement this Objection, including, without limitation, to object to amended claims. Separate notice and hearing will be scheduled for any such objection. The Settlement Trust also reserves the right to adjourn the hearing from time to time, without notice.

29. Notwithstanding anything contained in this Objection or the attached exhibits, nothing herein shall be construed as a waiver of any rights that the Settlement Trust may have to exercise its rights of setoff against the holders of such Claims relating to such avoidance actions.

30. Notice of the filing of this Objection has been provided to: (a) the Reorganized Debtor, (b) the Office of the United States Trustee for the District of Delaware; (c) any persons who have filed a request for notice in these chapter 11 cases pursuant to Local Rule 2002-1; and

(d) the parties whose Claims are the subject of this Objection. In light of the nature of the relief requested, the Settlement Trust submits that no further notice is required.

31. To the best of the Settlement Trust's knowledge and belief, the Objection and related Exhibits comply with Local Rule 3007-1 and the Rule 3007(c) General Order, as modified by the Court's March 24, 2017 Order [D.I. 2168]. To the extent that the Objection does not comply in all respects with the requirements of Local Rule 3007-1 or the Rule 3007(c) General Order, the Settlement Trust believes that such deviations are not material and respectfully requests that any such requirement be waived.

**No Prior Request**

32. No prior request for the relief sought in this Objection has been made to this or any other court.

WHEREFORE, the Settlement Trust respectfully requests the entry of the Order, substantially in the form attached hereto as **Exhibit 1**, granting the relief requested and granting such other and further relief as the Court deems just and proper.

Dated: July 20, 2018

Respectfully submitted,

FARNAN LLP

/s/ Michael J. Farnan

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*Attorneys for the Settlement Trust*

Dated: July 20, 2018  
Wilmington, Delaware

/s/ Amanda R. Steele

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-and-

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787 Seventh Avenue  
New York, New York 10019-6099  
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*Counsel for Samson Resources II, LLC, for itself  
and the Reorganized Debtor*

**Exhibit 1**



B. Each holder of a claim listed on Exhibits A through D, attached hereto, was properly and timely served with a copy of the Objection, this Order, and custom Notice; and

C. Any person or entity known to have an interest in the Claims subject to the Objection has been afforded a reasonable opportunity to respond to, or be heard regarding, the relief requested in the Objection; and

D. The facts set forth in the Declaration are undisputed; and

E. The Claims set forth on Exhibit A (the "Exhibit A Claims") are cross Debtor duplicate claims and shall be disallowed and expunged from the claims register;

F. The Claims set forth on Exhibit B (the "Exhibit B Claims") are exact duplicate claims and shall be disallowed and expunged from the claims register;

G. The Claims set forth on Exhibit C (the "Exhibit C Claims") are late filed claims and shall be disallowed and expunged from the claims register; and

H. The Claim set forth on Exhibit D (the "Exhibit D Claim") is a Claim to which the proof of claim does not include or attach sufficient information to constitute a prima facie evidence of validity, and shall be disallowed and expunged from the claims register; and

I. The relief requested in the Objection is in the best interest of the Debtors, their estates, the Reorganized Debtor, its creditors, and other parties in interest;

THEREFORE IT IS HEREBY ORDERED;

1. The Objection is granted in its entirety.
2. The Exhibit A Claims; Exhibit B Claims; Exhibit C Claims; and Exhibit D Claim are hereby disallowed and expunged from the claims register.
3. The Settlement Trust has the right to object in the future to any of the proofs of claim listed in this Objection or on the exhibits attached hereto on any ground, and to amend,

modify, and/or supplement this Objection, including, without limitation, to object to amended claims. Additionally, should one or more of the grounds of objection stated in the Objection be dismissed, the Settlement Trust's right to object on other stated grounds or any other grounds that the Settlement Trust discovers is further preserved.

4. Each Claim and the objections by the Settlement Trust to such Claim, as addressed in the Objection and as set forth on Exhibits A through D attached hereto, constitute a separate contested matter as contemplated by Bankruptcy Rule 9014 and Local Rule 3007-1. This Order shall be deemed a separate Order with respect to each Claim. Any stay of this Order pending appeal by any Claimant whose Claim is subject to this Order shall only apply to the contested matter which involves such Claimant and Claim and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters or Claims listed in the Objection or this Order.

5. The terms and conditions of this Order shall be immediately effective and enforceable, and the time to appeal this Order shall commence upon its entry. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

6. This Court shall retain jurisdiction over the claimants whose Claims are subject to the Objection with respect to any matters related to or arising from the Objection or the implementation of this Order.

Dated: \_\_\_\_\_, 2018

\_\_\_\_\_  
The Honorable Brendan L. Shannon  
United States Bankruptcy Judge



**Exhibit A**

In Re: Samson Resources Corporation - Case No. 15-11934 (BLS)  
16th Omnibus (Non- Substantive) Claims Objection

**Exhibit A - Cross Debtor Duplicate**

Name of Claimant	Remaining Claim Number	Claim Number	Date Claim Filed	Claim Amount (as filed)	Asserted Debtor / Modified Debtor	Reason for Disallowance
BILL BARRETT CORPORATION	2026	2025	11/20/15	\$1,914,389.61 General Unsecured	Samson Resources Corporation Samson Resources Company	Claim is duplicative of claim filed against another Debtor. The remaining claim is subject to further review and objection.
BIRD 2000 LIMITED PARTNERSHIP	2117	2116	11/20/15	\$1,921,889.61 General Unsecured	Samson Resources Corporation Samson Resources Company	Claim is duplicative of claim filed against another Debtor. The remaining claim is subject to further review and objection.
CHEVRON USA INC	1297	1296	11/17/15	\$49,471.00 General Unsecured	Samson Resources Corporation Samson Resources Company	Claim is duplicative of claim filed against another Debtor. The remaining claim is subject to further review and objection.
FOUR STAR OIL & GAS	1305	1304	11/17/15	\$36,287.00 General Unsecured	Samson Resources Corporation Samson Resources Company	Claim is duplicative of claim filed against another Debtor. The remaining claim is subject to further review and objection.
G4 LLC	2126	2125	11/20/15	\$164,848.79 General Unsecured	Samson Resources Corporation Samson Resources Company	Claim is duplicative of claim filed against another Debtor. The remaining claim is subject to further review and objection. See 17th Omnibus (Substantive) Objections, Exhibit B - No Liability for additional objections.
HISSOP ENERGY LLC	1803	1804	11/19/15	\$300,000.00 General Unsecured	Samson Resources Corporation Samson Lone Star, LLC	Claim is duplicative of claim filed against another Debtor. The remaining claim is subject to further review and objection.
HISSOP ENERGY LLC	1803	1805	11/19/15	\$300,000.00 General Unsecured	Samson Resources Company Samson Lone Star, LLC	Claim is duplicative of claim filed against another Debtor. The remaining claim is subject to further review and objection.
JETTA OPERATING COMPANY INC	2935	2936	10/27/16	\$592,290.25 General Unsecured	Samson Resources Corporation Samson Resources Company	Claim is duplicative of claim filed against another Debtor. The remaining claim is subject to further review and objection.
LINN OPERATING INC AS AGENT FOR LINN MIDSTREAM LLC	1909	1910	11/20/15	\$746,288.59 General Unsecured	Samson Resources Corporation Samson Resources Company	Claim is duplicative of claim filed against another Debtor. The remaining claim is subject to further review and objection.

In Re: Samson Resources Corporation - Case No. 15-11934 (BLS)  
 16th Omnibus (Non- Substantive) Claims Objection

**Exhibit A - Cross Debtor Duplicate**

<b>Name of Claimant</b>	<b>Remaining Claim Number</b>	<b>Claim Number</b>	<b>Date Claim Filed</b>	<b>Claim Amount (as filed)</b>	<b>Asserted Debtor / Modified Debtor</b>	<b>Reason for Disallowance</b>
S LAVON EVANS JR OPERATING CO INC	1629	1632	11/19/15	\$500,000.00 Secured, Unliquidated General Unsecured	Samson Resources Corporation  Samson Resources Company	Claim is duplicative of claim filed against another Debtor. The remaining claim is subject to further review and objection.
S LAVON EVANS JR OPERATING CO INC	1629	1636	11/19/15	\$500,000.00 Secured, Unliquidated General Unsecured	Samson Resources Corporation  Samson Resources Company	Claim is duplicative of claim filed against another Debtor. The remaining claim is subject to further review and objection.

**Exhibit B**

**In Re: Samson Resources Corporation - Case No. 15-11934 (BLS)  
16th Omnibus (Non- Substantive) Claims Objection**

**Exhibit B - Exact Duplicate**

<b>Name of Claimant</b>	<b>Remaining Claim Number</b>	<b>Claim Number</b>	<b>Date Claim Filed</b>	<b>Claim Amount (as filed)</b>	<b>Reason for Disallowance</b>
EVANS, LAVON	1629	1634	11/19/15	\$500,000.00 Secured, Unliquidated General Unsecured	Claim 1634 is duplicative of Claim 1629.
S LAVON EVANS JR OPER CO CORP	1629	1635	11/19/15	\$500,000.00 Secured, Unliquidated General Unsecured	Claim 1635 is duplicative of Claim 1629.
S LAVON EVANS JR OPER CO INC	1629	1631	11/19/15	\$500,000.00 Secured, Unliquidated General Unsecured	Claim 1631 is duplicative of Claim 1629.
S LAVON EVANS JR OPERATING CO INC	1629	1633	11/19/15	\$500,000.00 Secured, Unliquidated General Unsecured	Claim 1633 is duplicative of Claim 1629.
WAUSAU DEVELOPMENT CORPORATION	1629	1630	11/19/15	\$500,000.00 Secured, Unliquidated General Unsecured	Claim 1630 is duplicative of Claim 1629.
LOGNORMAL SOLUTIONS INC	2987	2988	11/14/17	\$21,600.00 General Unsecured	Claim 2988 is duplicative of Claim 2987.

**Exhibit C**

**In Re: Samson Resources Corporation - Case No. 15-11934 (BLS)  
16th Omnibus (Non- Substantive) Claims Objection**

**Exhibit C - Late Filed**

<b>Name of Claimant</b>	<b>Date Claim Filed</b>	<b>Claim Number</b>	<b>Claim Amount (as filed)</b>	<b>Reason for Disallowance</b>
FAUL, DONNA	10/26/17	2980	\$10,000,000.00 General Unsecured	Claim filed after applicable bar date.
FAUL, DONNA	10/27/17	2981	\$10,000,000.00 General Unsecured	Claim filed after applicable bar date.
LUQUETTE, ALBERT JR.	10/26/17	2979	\$10,000,000.00 General Unsecured	Claim filed after applicable bar date.
LUQUETTE, ALBERT JR.	10/27/17	2982	\$10,000,000.00 General Unsecured	Claim filed after applicable bar date.
LUQUETTE, SHANNON	10/26/17	2977	\$10,000,000.00 General Unsecured	Claim filed after applicable bar date.
LUQUETTE, SHANNON	10/27/17	2983	\$10,000,000.00 General Unsecured	Claim filed after applicable bar date.
WEAVER, JOETTA	10/26/17	2978	\$10,000,000.00 General Unsecured	Claim filed after applicable bar date.
WEAVER, JOETTA	10/27/17	2984	\$10,000,000.00 General Unsecured	Claim filed after applicable bar date.

**Exhibit D**



**In Re: Samson Resources Corporation - Case No. 15-11934 (BLS)  
 16th Omnibus (Non- Substantive) Claims Objection**

**Exhibit D - No Supporting Documentation**

Name of Claimant	Claim Number	Claim Amount (as filed)	Modified Claim Amount	Priority Status	Reason for Disallowance
WYATT, LARRY C	261	\$21,004.70 & Unliquidated	\$0.00	Priority, Secured	Claimant provided no support to substantiate claim.

# EXHIBIT 2

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

	)	
In re	)	Chapter 11
	)	
SAMSON RESOURCES CORPORATION,	)	Case No. 15-11934 (BLS)
	)	
	)	
Reorganized Debtor.	)	
	)	

**DECLARATION OF JEREMY LEATH IN SUPPORT  
OF REORGANIZED DEBTOR AND SETTLEMENT TRUST’S  
JOINT SIXTEENTH OMNIBUS NON-SUBSTANTIVE OBJECTION TO  
CLAIMS PURSUANT TO SECTION 502(B) OF THE BANKRUPTCY CODE,  
BANKRUPTCY RULES 3001, 3003, 3007, AND LOCAL BANKRUPTCY RULE 3007-1**

I, Jeremy Leath, declare as follows:

1. I make this declaration (the “Declaration”) in support of the Reorganized Debtor (“Reorganized Debtor”) and the Settlement Trust’s (collectively, with the Reorganized Debtor, “Settlement Trust”) Sixteenth Omnibus Substantive Objection to Claims (the “Objection”).<sup>1</sup>

2. I began working for the Debtors in 1999 and am currently serving as a Manager in the Revenue Accounting department for the Reorganized Debtor.

3. I make this Declaration upon the basis of personal knowledge or knowledge of persons under my supervision and a review, by me and others working with me and under my supervision, of (i) the claims identified on **Exhibits A-D** (the “Claims”) to the Order attached as **Exhibit 1** to the Objection (the “Order”), (ii) the Claims Register, and (iii) the Debtors’ applicable Books and Records.

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<sup>1</sup> Capitalized terms used herein but not otherwise defined shall have the same meaning ascribed to such terms in the Objection.

4. The information contained in the Objection is true and correct to the best of my knowledge, information, and belief. Upon review of the Claims filed in these chapter 11 cases and supporting documentation attached thereto, the Settlement Trust has determined that the Claims listed on Exhibits A-D to Exhibit 1 to the Objection are not properly asserted pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, Local Bankruptcy Rule 3007-1, and applicable orders of the Bankruptcy Court. If called as a witness, I would testify competently thereto.

5. The Debtors kept very detailed billing and payment records for all royalty and other interests impacting the business in an electronic database management system licensed from SAP. This system helped the Debtors to accurately calculate and track, among many other metrics, ownership interests, production information, sales and revenue data, and costs associated with production. A review of the Debtors' records has not demonstrated any abnormalities or missed payments concerning the disputed claim listed on Exhibit D or the interests associated with that claim.

6. The Reorganized Debtor has reviewed the Claim on Exhibit D subject to the Objection. The objection set forth in Exhibit D to the Order are based upon its review of the Claim and a comparison of it against the Debtors' liabilities as set forth in the Debtors' records. In addition, with respect to the Claim listed on Exhibit D to the Order, the Reorganized Debtor has reviewed the Debtors' books and records to determine whether the amount asserted in the claim was correct.

7. Based on the Reorganized Debtor's review of the Debtors' books and records, the amount asserted in the claim listed on Exhibit D cannot be substantiated.

8. As a result, the Reorganized Debtor, in consultation with the Settlement Trust, has determined it is appropriate to object to the proof of claim listed on **Exhibit D** to the Order. After reviewing the Claim and the documentation supporting the Claim, the Reorganized Debtor has concluded that there is no basis in the Debtors' books and records for the claim as asserted and that the claim does not include or attach sufficient information or documentation to support the proof of claim. As such, the Claim identified on **Exhibit D** to the Order should be disallowed.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: July 20, 2018

/s/ Jeremy Leath  
Jeremy Leath

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

	)	
In re:	)	Chapter 11
	)	
SAMSON RESOURCES CORPORATION, <i>et al.</i> ,	)	Case No. 15-11934 (BLS)
	)	
Reorganized Debtor.	)	
	)	

**NOTICE OF REORGANIZED DEBTORS AND SETTLEMENT TRUST’S JOINT SIXTEENTH OMNIBUS NON-SUBSTANTIVE OBJECTION TO CLAIMS PURSUANT TO SECTION 502(B) OF THE BANKRUPTCY CODE, BANKRUPTCY RULES 3001, 3003, 3007, AND LOCAL BANKRUPTCY RULE 3007-1 AND SEVENTEENTH OMNIBUS SUBSTANTIVE OBJECTION TO CLAIMS PURSUANT TO SECTION 502(B) OF THE BANKRUPTCY CODE, BANKRUPTCY RULES 3001, 3003, 3007, AND LOCAL BANKRUPTCY RULE 3007-1 AND HEARING THEREON**

On July 20, 2018, the Reorganized Debtors and the Settlement Trust (collectively, with the Reorganized Debtors, “Settlement Trust”) of the above-captioned reorganized debtors and debtors in possession (the “Debtors”) filed the **Reorganized Debtors and Settlement Trust’s Joint Sixteenth Omnibus Non-Substantive Objection to Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rule 3007-1 and Seventeenth Omnibus Substantive Objection to Claims Pursuant to Section 502(b) of the Bankruptcy Code, Bankruptcy Rules 3001, 3003, and 3007, and Local Bankruptcy Rule 3007-1** (the “Objections”).<sup>1</sup> You are receiving this secondary Notice because you requested to receive notices at a secondary address in addition to the primary address identified to receive notifications related to certain Claims that were filed.

By the Objections, the Settlement Trust seeks to disallow the Claims listed as Exhibits to the Objections. To receive a copy of the Objections and Exhibits, please visit the Garden City Group website (<http://cases.gcginc.com/SamsonRestructuring/>) or contact the undersigned attorneys.

Responses to the Objections, if any, must be in writing and filed on or before **August 8, 2018 at 4:00 p.m. (Eastern Time)** (the “Objection Deadline”) with the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, 3rd Floor, Wilmington, Delaware 19801.

At the same time, you must also serve a copy of any such response upon the undersigned counsel to the Settlement Trust so that the response is **actually received** on or before the Objection Deadline.

A HEARING ON THE OBJECTION WILL BE HELD ON **AUGUST 22 AT 10:30 A.M. (Eastern Time)** BEFORE THE HONORABLE BRENDAN L. SHANNON IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 6TH FLOOR, COURTROOM NO. 1, WILMINGTON, DELAWARE 19801.

<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Objection.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: July 20, 2018

Respectfully submitted,

Farnan LLP

/s/ Michael J. Farnan

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*Attorneys for the Settlement Trust*

Dated: July 20, 2018  
Wilmington, Delaware

/s/ Amanda R. Steele

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*Counsel for Samson Resources II, LLC, for itself  
and the Reorganized Debtors*