

**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.	)	Objection Deadline: March 29, 2019 at 4:00 p.m. Eastern
	)	Hearing Date: April 24, 2019 at 11:00 a.m. Eastern

**SETTLEMENT TRUST’S TWENTIETH 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**

**THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON EXHIBITS A-F TO EXHIBIT 1 ATTACHED TO THIS OBJECTION**

The Settlement Trust (“Settlement Trust”) files this twentieth omnibus objection to claims (this “Objection”), pursuant to which the Settlement Trust requests the entry of an order, substantially in the form attached hereto as **Exhibit 1** (the “Order”), (a) disallowing each of the claims identified on **Exhibits A-F** to **Exhibit 1** (the “Claims”), attached hereto and as discussed in further detail below, and (b) authorizing Garden City Group, LLC (the “Claims Agent”) to expunge the Claims on the official register maintained by the Claims Agent (the “Claims Register”). In further support of this Objection, the Settlement Trust respectfully states as follows:

**Jurisdiction and Venue**

1. The United States Bankruptcy Court for the District of Delaware (the “Court”) 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 should be expunged or modified, accordingly, because the Debtors’ books and records either show no outstanding liability or a reduced liability.

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 Debtors’ 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>1</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 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

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<sup>1</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

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. Substantive Duplicate Claims**

15. The Claims listed on Exhibit A to Exhibit 1 are Claims in which claimants filed substantively duplicate Claims against the same Debtor, here, Samson Resources. Bird 2000 Limited Partnership (“Bird 2000”) (Claim 2117) and Bill Barrett Corporation (“Bill Barrett”) (Claim 2026) assert almost identical claims arising out of the same letter agreement relating to certain drilling carry obligations in Converse County, Wyoming (“Letter Agreement”). Bird 2000 asserts a claim in the amount of \$1,921,889.61 and Bill Barrett asserts a claim in the amount of \$1,914,389.61. The claims of Bird 2000 and Bill Barrett are identical aside from \$7,500, which Bird 2000 adds to its claim for attorneys’ fees.

16. Bird 2000 and Bill Barrett’s claims are attempting a double recovery, as they are seeking the same amount pursuant to rights that stem from that same Letter Agreement. Indeed, the Debtor should not be required to pay on the same claim twice. Given there is no support provided for the calculation of attorneys’ fees and an award of such fees does not appear appropriate under the circumstances, Bird 2000’s claim should be disallowed and expunged. As

a result, Bill Barret's claim, Claim Number 2026, should survive.

17. Additionally, Jetta Operating Company Inc. ("Jetta") (Claim 2935) asserts a claim in the amount of \$592,290.25, which relates to certain rights it purchased from Bill Barrett under the Letter Agreement. It appears Jetta's claim is a percentage of the claim being asserted by Bill Barret and, therefore, a duplicate claim of the one asserted by Bill Barrett. Therefore, as with Bird 2000's claim, Jetta's claim should be disallowed and expunged.

18. In sum, the claims asserted by Bird 2000 and Jetta should be disallowed and expunged because the Debtor should not be required to paid more than once on the same underlying claim and expungement will reflect a more accurate claims register. *See, generally, In re Orion Refining Corp.*, 317 B.R. 660, 662 (Bank. D. Del. 2004).

19. 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. Modification of Claim Amounts**

20. The Claim listed on **Exhibit B** to **Exhibit 1** is a Claim (Claim 1887) asserted in an incorrect amount. Based on the Settlement Trust's review of this Claim and the Debtor's Books and Records, the claim is higher than the amount of liability reflected in the Debtor's Books and Records and, additionally, is asserted in an amount that is not supported by the documentation provided.

21. Failure to modify this Claim could result in claimant receiving an unwarranted recovery to the detriment of other similarly situated creditors. Moreover, modification of this Claim will enable the Claims Register to reflect more accurately the claims asserted against the Debtor. Accordingly, the Settlement Trust respectfully requests that this Claim be reduced or

fixed to assert the amount listed under the heading “Modified Amount,” as noted on **Exhibit B** to **Exhibit 1**, which corresponds with the amount the Settlement Trust believes is owed.

**III. No Liability—Digges Claim**

22. The Claim listed on **Exhibit C** to **Exhibit 1** is a Claim (Claim 2701) in which claimants have asserted the Debtor are liable for \$1,000,000.00 based on a personal injury lawsuit filed by Steven and Cheri Digges in the United States District Court of North Dakota, Northwest Division (“North Dakota Action”). As a result of a review of the docket in the North Dakota Action, it appears the Debtor has been dismissed from the lawsuit. Therefore, as the Debtor cannot be held liable, this claim should be disallowed and expunged.

23. If this Claim is not disallowed and expunged, claimants would receive a windfall because they would receive payments they are not entitled. As a result, the Settlement Trust objects to the Claim listed on **Exhibit C** and respectfully requests entry of the Order disallowing in full and expunging the Claim listed on **Exhibit C**.

**IV. No Liability—Mitchell Claim**

24. The Claim listed on **Exhibit D** to **Exhibit 1** is a Claim (Claim 547) in which claimant has asserted the Debtor is liable for \$550,000.00 based on a royalty interest in Ridl 1-8 Well, Stark County, North Dakota (“Well”). However, the Debtor sold the Well and is not the responsible party for paying the royalty interest. Therefore, as the Debtor is not responsible for these payments, this claim should be disallowed and expunged.

25. If this Claim is not disallowed and expunged, claimant would receive a windfall because he would receive payments he is not entitled. As a result, the Settlement Trust objects to the Claim listed on **Exhibit D** and respectfully requests entry of the Order disallowing in full and expunging the Claim listed on **Exhibit D**.

**V. Insufficient Documentation Claims**

26. The Claims listed on Exhibit E to Exhibit 1 have been filed without proper justification and/or any documentation to substantiate the proofs of claim (Claims 112, 1803, 1966, 2487, 2492, and 2591). 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.

27. Absent the application of the presumption, the burden of going forward and proving the Claim by a preponderance of the evidence remains on the claimants. *In re Porter*, 374 B.R. 471, 483 (Bankr. D. Conn.2007). Without sufficient information or documentation to permit reconciliation of the proofs of claim, the Insufficient Documentation Claims fail 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 claimants by the objection deadline, the Court enter the Order disallowing in full and expunging the Claims listed on Exhibit E.

**VI. No Liability**

28. The Claims listed on Exhibit F to Exhibit 1 are claims in which claimants have asserted various amounts they allege to be due (Claims 823, 1271, 1669, and 1909). As a result of a review of the Claims Register and the Books and Records (*see* Declaration of Leath, attached as Exhibit 2), the Settlement Trust has identified these Claims for which the Books and Records reflect no liability.

29. If these Claims are not disallowed and expunged, claimants would receive a windfall because they would receive payments they are not entitled. As a result, the Settlement



Trust objects to the Claims listed on **Exhibit F** and respectfully requests entry of the Order disallowing in full and expunging the Claims listed on **Exhibit F**.

**SEPARATE CONTESTED MATTER**

30. 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**

31. 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 **March 29, 2019** (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

**Office of the United States Trustee**

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

32. 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.

33. 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 and/or modifying the Claim, without further notice to the claimant or a hearing.

34. 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**

35. 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.

36. 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.

37. 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.

38. 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**

39. 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: March 7, 2019

Respectfully submitted,

FARNAN LLP

/s/ Michael J. Farnan

Joseph J. Farnan, Jr. (Bar No. 100245)  
Joseph J. Farnan, III (Bar No. 3945)  
Michael J. Farnan (Bar No. 5165)  
919 North Market Street, 12th Floor  
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*Attorneys for the Settlement Trust*

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

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

**NOTICE OF SETTLEMENT TRUST’S TWENTIETH 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 March 7, 2019, the Settlement Trust (“Settlement Trust”) of the above-captioned reorganized debtors and debtors in possession (the “Debtors”) filed the **Settlement Trust’s Twentieth 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 **March 29, 2019 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 **APRIL 24, 2019 AT 11:00 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.

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.

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

Dated: March 7, 2019

Respectfully submitted,

Farnan LLP

/s/ Michael J. Farnan

Joseph J. Farnan, Jr. (Bar No. 100245)

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Michael J. Farnan (Bar No. 5165)

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**Exhibit 1**

**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.	)	
	)	<b>D.I.</b> _____

**ORDER GRANTING SETTLEMENT TRUST’S TWENTIETH 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**

Upon the objection (the “Objection”)<sup>1</sup> of the Settlement Trust (“Settlement Trust”) seeking entry of an order (“Order”) disallowing certain Claims pursuant to section 502(b) of the Bankruptcy Code and Rule 3007 of the Bankruptcy Rules; and it appearing that the Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and it appearing that this proceeding is a core proceeding pursuant to 28 U.S.C. § 157; and it appearing that venue of this proceeding is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; and adequate notice of the Objection and opportunity for response having been given; and it appearing that no other notice need be given; and the Court having considered the Objection, the Declaration, the claims listed in Exhibits A through E attached hereto, and any responses thereto; and upon the record herein; and after due deliberation and sufficient cause appearing therefore, it is FOUND AND DETERMINED:

A. This Objection is a core proceeding under 28 U.S.C. § 157(b)(2); and

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<sup>1</sup> All otherwise undefined terms shall have the same meaning ascribed to them in the Objection.



B. Each holder of a claim listed on Exhibits A through F, 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 substantive duplicate claims and shall be disallowed and expunged from the claim register;

F. The Claim set forth on Exhibit B (the "Exhibit B Claim") shall be modified as set forth in the Objection and reflected as such on the claim register;

G. The Claims set forth on Exhibit C and D (the "Exhibit C and D Claim") are claims to which there exists no basis on the Reorganized Debtor's books and records for payment and shall be disallowed and expunged from the claim register;

H. The Claims set forth on Exhibit E (the "Exhibit E Claims") are Claims to which there is insufficient documentation to substantiate the proofs of claim exists and shall be disallowed and expunged from the claim register; and

I. The Claims set forth on Exhibit F (the "Exhibit F Claims") are Claims to which there exists no basis on the Debtors' books and records for payment and shall be disallowed and expunged from the claim register; and

J. 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, Exhibit C, Exhibit D, and Exhibit E Claims are hereby disallowed and expunged from the claims register.

3. The Exhibit B Claim is hereby modified as set forth in the Objection.

4. 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.

5. 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 E 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.

6. 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).

7. 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: \_\_\_\_\_, 2019

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The Honorable Brendan L. Shannon  
United States Bankruptcy Judge

**Exhibit A**

In Re: Samson Resources Corporation - Case No. 15-11934 (BLS)  
 20th Omnibus (Substantive) Claims Objection

**Exhibit A - Substantive Duplicate Claims**

Name of Claimant	Surviving Claim Number	Claim Number	Date Claim Filed	Claim Amount (as filed)	Reason for Disallowance
BIRD 2000 LIMITED PARTNERSHIP	2026	2117	11/20/15	\$1,921,889.61. General Unsecured	Substantive duplicate of Claim 2026, Bill Barrett Corporation. The alleged debt and the basis for such claim is captured and restated, in part or in whole, in the proofs of claim listed in the column entitled "Remaining Claim Number." Thus, the claim to be disallowed is redundant of the Remaining Claims. The remaining claim is subject to further review and objection.
JETTA OPERATING COMPANY INC	2026	2935	10/27/16	\$592,290.25 General Unsecured	Substantive duplicate of Claim 2026, Bill Barrett Corporation. The alleged debt and the basis for such claim is captured and restated, in part or in whole, in the proofs of claim listed in the column entitled "Remaining Claim Number." Thus, the claim to be disallowed is redundant of the Remaining Claims. The remaining claim is subject to further review and objection.

**Exhibit B**

In Re: Samson Resources Corporation - Case No. 15-11934 (BLS)  
 20th Omnibus (Substantive) Claims Objection

**Exhibit B - Modification of Claim Amount**

Name of Claimant	Claim #	Claim Amount	Modified Claim Amount	Original Claim Amount by Priority	Modified Claim Amount by Priority	Reason for Modification
ENERGEN RESOURCES CORPORATION	1887	\$624,846.76	\$363,099.52	General Unsecured	General Unsecured	Claimed amount should be reduced to \$363,099.52 General Unsecured per Debtors' books and records review.

**Exhibit C**



In Re: Samson Resources Corporation - Case No. 15-11934 (BLS)  
 20th Omnibus (Substantive) Claims Objection

**Exhibit C - No Liability**

Name of Claimant	Claim Number	Date Claim Filed	Claim Amount (as filed)	Reason for Disallowance
DIGGES, STEVEN & CHERI	2701	01/21/16	\$1,000,000.00 General Unsecured	Debtors' show no liability related to this party. Debtor's search review of the personal injury lawsuit filed by the claimants in the United States District Court of North Dakota, Northwest Division results found the Debtor's were dismissed from the lawsuit. Therefore, this claim should be disallowed and expunged.

**Exhibit D**

In Re: Samson Resources Corporation - Case No. 15-11934 (BLS)  
20th Omnibus (Substantive) Claims Objection

**Exhibit D - No Liability**

Name of Claimant	Claim Number	Date Claim Filed	Claim Amount (as filed)	Reason for Disallowance
MICHAEL H MITCHELL	547	11/12/15	\$550,000.00 General Unsecured	Debtors' show no liability related to this party. Claim asserts royalty interest in Ridl 1-8 Well, Stark County, North Dakota "Well". Debtor sold the well and is not the responsible party for paying royalty interest. Therefore, this claim should be disallowed and expunged.

**Exhibit E**

In Re: Samson Resources Corporation - Case No. 15-11934 (BLS)  
 20th Omnibus (Substantive) Claims Objection

**Exhibit E - Insufficient Documentation Claims**

<b>Name of Claimant</b>	<b>Claim Number</b>	<b>Date Claim Filed</b>	<b>Claim Amount (as filed)</b>	<b>Reason for Disallowance</b>
BRAZOS LP	2492	11/27/15	Unliquidated General Unsecured	Claimant provided insufficient support to substantiate claim.
EDWARD OIL COMPANY	2487	11/27/15	Unliquidated General Unsecured	Claimant provided insufficient support to substantiate claim.
FIVE THREE BARKER, LLC	2591	12/07/15	Unliquidated General Unsecured	Claimant provided insufficient support to substantiate claim.
HISSOP ENERGY LLC	1803	11/19/15	\$300,000.00 General Unsecured	Claimant provided insufficient support to substantiate claim.
KENT HAUGLAND	1966	11/20/15	\$500,000.00 General Unsecured	Claimant provided insufficient support to substantiate claim.
SECHRIST FAMILY TRUST DATED 10-30-2008	112	11/03/15	Unliquidated General Unsecured	Claimant provided insufficient support to substantiate claim.

**Exhibit F**

**In Re: Samson Resources Corporation - Case No. 15-11934 (BLS)**  
**20th Omnibus (Substantive) Claims Objection**

**Exhibit F - No Liability Claims**

<b>Name of Claimant</b>	<b>Claim Number</b>	<b>Date Claim Filed</b>	<b>Claim Amount (as filed)</b>	<b>Reason for Disallowance</b>
IRA LEE WILSON PARKER ESTATE	823	11/16/15	Unliquidated General Unsecured	Debtors' show no liability related to this party within its books and records.
LINN OPERATING INC AS AGENT FOR LINN MIDSTEAM, LLC	1909	11/20/15	\$746,288.59 General Unsecured	Debtors' show no liability related to this party within its books and records.
ROBERT E TURNER, AS WRONGFUL DEATH REPRESENTATIVE	1271	11/17/15	Unliquidated General Unsecured	Debtors' show no liability related to this party within its books and records.
WESTERN ASSOCIATION OF FISH & WILDLIFE AGENCIES	1669	11/19/15	\$376,861.50 General Unsecured	Debtors' show no liability related to this party within its books and records.

**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 SETTLEMENT TRUST’S  
TWENTIETH 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**

I, Jeremy Leath, declare as follows:

1. I make this declaration (the “Declaration”) in support of the Settlement Trust’s (“Settlement Trust”) Twentieth 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 B-F** (the “Claims”) to the Order attached as **Exhibit 1** to the Objection (the “Order”), (ii) the Claims Register, and (iii) the applicable Books and Records.

<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 C-F 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 liabilities concerning any of the disputed claims listed on Exhibits C-F or the interests associated with those claims.

6. The Reorganized Debtor has reviewed each of the Claims on Exhibits C-F subject to the Objection. The objections set forth in Exhibits C-F to the Order are based upon its review of the Claims and a comparison of them against the Debtors' liabilities as set forth in the Debtors' records. In addition, with respect to each of the Claims listed on Exhibits C-F 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 amounts asserted in each claim listed on Exhibits C-F cannot be substantiated.

8. Further, upon the Reorganized Debtor's review of the Objection and the books and records of the Debtors, the Reorganized Debtor believes that the claim listed on **Exhibit B** is higher in amount than what is owed to the claimant, so that the claim should be modified accordingly.

9. As a result, the Reorganized Debtor, in consultation with the Settlement Trust, has determined it is appropriate to object to each of the proofs of claim listed on **Exhibits B-F** to the Order. After reviewing the Claims and the documentation supporting the Claims, the Reorganized Debtor has concluded that there is no basis in the Debtors' books and records for the claims as asserted. Therefore, the Claims identified on **Exhibits B-F** to the Order should be disallowed and/or modified.

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: March 7, 2019

/s/ Jeremy Leath  
Jeremy Leath