

DISTRICT COURT, LA PLATA COUNTY, COLORADO
Court Address: 1060 E. 2nd Ave., Durango, CO 81301
Phone Number: (970)247-2304

Plaintiff(s): RICHARD PARRY, LINDA PARRY,
EVELYN L. PAYNE, and DAVID G. GROBLEBE,
individually and as representative Plaintiffs on behalf of
persons similarly situated, (94CV111)

(Consolidated with other cases as 94CV105)

v.

Defendant(s): AMOCO PRODUCTION COMPANY, a
Delaware corporation

Attorney or Party Without Attorney:

G.R. Miller
MCDANIEL, BATY, MILLER, AGRO & DOWNS, LLC
1040 Main Avenue
P.O. Box 1157
Durango, CO 81302

and of counsel:

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Gregory J. Stucky
David G. Seely
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▲ COURT USE ONLY ▲

Case Number: 94CV105

Div.:

Ctrm.:

**REPLY IN SUPPORT OF PLAINTIFFS'
MOTION FOR PARTIAL SUMMARY JUDGMENT REQUIRING AMOCO TO
REFUND ALL DEDUCTIONS (EXCEPT TAXES) TAKEN FROM ROYALTY
PAYMENTS UNDER INSTRUMENTS PLACED IN SUBCLASS 2**

Defendant Amoco Production Company took the position that it is unable to respond to plaintiffs' motion "until after the Court makes its ruling following briefs called for by the May 17 order." Amoco Response at 3. Amoco states it "should be given an opportunity to respond to the motion once the 'ground rules' are established by the Court's order." Amoco Response at 4.


Plaintiffs have no objection to the filing of Amoco's response promptly following the referenced Court order, provided Plaintiffs are permitted a reasonable time to file their reply to Amoco's responsive brief.

Respectfully submitted,

FLEESON, GOING, COULSON & KITCH, L.L.C.
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-and-

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By: 

G.R. Miller - #8406
Attorneys for Plaintiffs and Plaintiff Class

CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of June, 2002, I mailed a true and correct copy of the above and foregoing **REPLY IN SUPPORT OF PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT REQUIRING AMOCO TO REFUND ALL DEDUCTIONS (EXCEPT TAXES) TAKEN FROM ROYALTY PAYMENTS UNDER INSTRUMENTS PLACED IN SUBCLASS 2** postage prepaid and properly addressed, to the following persons:

John R. Cooney
Charles A. Armgardt
MODRALL, SPERLING, ROEHL,
HARRIS & SISK, P.A.
P.O. Box 2168
Bank of America Centre, Suite 1000
500 Fourth Street, N.W.
Albuquerque, NM 87103-2168

Michael R. Homeyer
BP AMOCO
Post Office Box 3092
Houston, TX 77253-3092

Thomas P. Dugan
DUGAN & RASURE
900 Main Avenue, Suite A
Durango, CO 81301

A handwritten signature in cursive script that reads "Belinda Snow". The signature is written in black ink and is positioned above a solid horizontal line.