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**FILED**  
2009 AUG 20 AM 10:47  
KOLEEN NOSEKABEL  
CLERK OF THE DIST. COURT  
ICB  
STEVENS CO. KS

IN THE TWENTY-SIXTH JUDICIAL DISTRICT  
DISTRICT COURT, STEVENS COUNTY, KANSAS  
CIVIL DEPARTMENT

TIMOTHY J. COULTER, individually )  
and as representative plaintiff on behalf of )  
persons or companies similarly situated, )  
 )  
Plaintiffs, )  
vs. )  
 )  
ANADARKO PETROLEUM CORPORATION, )  
 )  
Defendant. )  
 )

Case No. 98-CV-40

**PETITION FOR ALLOWANCE OF  
REASONABLE ATTORNEY FEES AND LITIGATION EXPENSES**

COME NOW the undersigned Petitioners, as counsel for Plaintiffs and Plaintiff Class, and respectfully apply for an allowance of reasonable attorneys' fees and litigation expenses out of the common fund created by their efforts. Petitioners hereby apply for recovery of attorneys' fees in the amount of

One-third (1/3) of the Net Settlement Fund (as defined in the Stipulation of Settlement) allocated to Participating Class Members (as defined in the Stipulation of Settlement), after first subtracting (a) the reasonable litigation expenses of \$182,153.22, and (b) \$50,000.00 for the Notice and Administration Fund (as defined in the Stipulation of Settlement),

which should be paid to Petitioners at the same time as the distributions to Participating Class Members are to be paid.

Petitioners also request reimbursement of reasonable litigation expenses incurred, in the amount of \$182,153.22, and \$50,000.00 from the Notice and Administration Fund.

In support of this Petition, Petitioners submit herewith a Memorandum in Support of Petition for Allowance of Reasonable Attorneys' Fees and Litigation expenses.

Respectfully submitted,

KRAMER, NORDLING & NORDLING, LLC

By  \_\_\_\_\_

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-and-

Thomas D. Kitch, #07034  
Gregory J. Stucky, #09674  
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*Petitioners and Attorneys for Plaintiffs and Plaintiff Class*

CERTIFICATE OF SERVICE

I certify that on this 20th day of August, 2009, a copy of the foregoing **Petition for Allowance of Reasonable Attorney Fees and Litigation Expenses** was placed in the United States mail in Wichita, Kansas, first-class, postage prepaid, addressed to:

Daniel H. Diepenbrock  
LAW OFFICE OF  
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