

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 09-CV-000673-WDM-KMT

LLH OPERATIONS LLLP, and the
ESTATE of MARY B. FASSET, individually
And as representative Plaintiffs on behalf of
Persons similarly situated,

Plaintiffs,

v.

SAMSON RESOURCES COMPANY, an
Oklahoma Corporation,

Defendant.

NOTICE OF PROPOSED SETTLEMENT

Pursuant to 28 U.S.C. § 1715(b), Defendant Samson Resources Company (“Samson”) hereby gives notice of the proposed settlement of the captioned action which alleges claims on behalf of a proposed class (the “Action”). As of the filing of this Notice there has been no class certified in the Action. Samson states:

1. Samson is the only defendant in this Action and is, therefore, the only defendant participating in the proposed settlement.

2. This class action was originally filed in the District Court of La Plata County, Colorado, under a Colorado rule of judicial procedure authorizing an action to be brought by one or more representatives as a class action, and was thereafter removed to the United States District Court for the District of Colorado.

3. Samson attaches hereto as Exhibit A to Notice of Proposed Settlement, a copy of the Complaint filed in the District Court of La Plata County, Colorado. No materials were filed with the Complaint and no amended complaint was filed.

4. On January 15, 2010, Samson and Plaintiffs filed in this Action a Joint Motion (“Joint Motion”) to Enter Order Conditionally Certifying a Plaintiff Class, Preliminarily Approving Settlement Agreement, Approving Form of Notice, and Scheduling a Fairness Hearing. A copy of the proposed Agreement for Settlement of Claims against Samson Resources Company (“Settlement Agreement”) was attached to the Joint Motion.

5. The proposed notification to the potential class members was attached as Exhibit A to the proposed Preliminary Order Approving Form of Notice (“Preliminary Order”), which proposed Preliminary Order was itself attached as Exhibit D to the Settlement Agreement. The proposed notification will advise potential class members of their right to request exclusion from the Action, and the proposed settlement of the Action. A complete copy of the Joint Motion with all attachments, consisting of the Settlement Agreement and all exhibits to the Settlement Agreement, is attached hereto as Exhibit B to Notice of Proposed Settlement.

6. Outside of the Settlement Agreement, there is no other settlement or agreement contemporaneously made between Class Counsel and counsel for Samson.

7. There is has been no final judgment or notice of dismissal issued in the Action.

8. There is no judicial hearing currently scheduled in the Action. The parties have requested, in the Joint Motion, that a Fairness Hearing be scheduled no sooner than one hundred (100) days after January 15, 2010.

9. The names of potential class members who reside in each state, generated from Samson’s accounting records, are shown on Exhibit C to Notice of Proposed Settlement attached hereto.

10. The estimated proportionate share of the claims of such potential class members in each state, to the entire settlement, is stated in Exhibit D to Notice of Proposed Settlement

attached hereto.

11. There is no written judicial opinion relating to the materials described in paragraphs 5 through 7 above, which correspond to the information required by 28 U.S.C. § 1715(b)(3) through (6).

12. There is no person in the State of Oklahoma or any other State listed on Exhibit D to Notice of Proposed Settlement attached hereto, who regulates or supervises the matters alleged in Action.

13. This Notice of Proposed Settlement and attached exhibits is being served upon the Attorney General of the United States and the State Attorney General of each State listed on Exhibit D to Notice of Proposed Settlement attached hereto.

Respectfully submitted,

MODRALL, SPERLING, ROEHL,
HARRIS & SISK, P.A.

Electronically Filed

By /s/ John R. Cooney

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ATTORNEYS FOR DEFENDANT

I hereby certify that on the 20th day of January, 2010, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following e-mail addresses:

Thomas P. Dugan (tpdugan@dugan-law.com)
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