

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF KANSAS

HUGO SPIEKER, LAURALEE SPIEKER, )  
STEVEN POWERS, PATTIE POWERS, )  
CLINTIN FLOYD WASSON, JEANNE )  
WASSON, KENNY CARTER, )  
CHRISTINE CARTER, and JIMMY D. )  
CARTER, individually and as )  
representative plaintiffs on behalf of )  
persons and concerns similarly situated, )  
 )  
Plaintiffs, )

Case No. 07-1225-EFM

v. )

POSTROCK MIDCONTINENT )  
PRODUCTION, LLC, successor by merger )  
to QUEST CHEROKEE, LLC, )  
a Delaware limited liability company )  
 )  
Defendant. )

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

The undersigned lawyers and the law firm of Fleeson, Gooing, Coulson & Kitch, L.L.C. (“Petitioners”) respectfully apply to the Court for an allowance of attorneys’ fees in the amount of one-fourth (25%) of the total settlement funds, after reimbursement of reasonable litigation expenses and administrative expenses, to be disbursed pursuant to the Settlement Agreement dated November 25, 2011. Petitioners further apply for reimbursement of their reasonable litigation expenses, in the amount of \$43,242.90. Administrative expenses are the subject of a separate application (Doc. 127) and are not included in this motion.

In support of this motion, Petitioners submit a Memorandum in Support of Motion for Allowance of Reasonable Attorneys’ Fees and Litigation Expenses.

Petitioners respectfully request that, following the Court's consideration of the supporting memorandum and the evidence to be presented on December 30, 2011, their motion for allowance of reasonable attorney fees and expenses be granted.

Respectfully submitted,

By: /s/ Charles E. Millsap  
Charles E. Millsap, #09692  
[cmillsap@fleeson.com](mailto:cmillsap@fleeson.com)  
David G. Seely, #11397  
[dseely@fleeson.com](mailto:dseely@fleeson.com)  
Daniel E. Lawrence, #23728  
[dlawrence@fleeson.com](mailto:dlawrence@fleeson.com)  
FLEESON, GOOING, COULSON & KITCH, L.L.C.  
1900 Epic Center  
301 N. Main  
P.O. Box 997  
Wichita, Kansas 67201  
(316)267-7361

*Attorneys for Plaintiffs and Plaintiff Class*

**CERTIFICATE OF SERVICE**

I certify that on December 23, 2011, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system which will send a notice of electronic filing to the following:

Matthew J. Salzman, Reg. #19460  
Jason A. Dunn, Reg. #21437  
1201 Walnut Street  
Kansas City, MO 64106  
Telephone: (816)842-8600  
E-mail: [msalzman@stinson.com](mailto:msalzman@stinson.com)  
[jdunn@stinson.com](mailto:jdunn@stinson.com)

David E. Bengston, Reg. #12184  
Stinson Morrison Hecker LLP  
1625 N. Waterfront Parkway, Suite 300  
Wichita, KS 67206-6602  
Telephone: (316)265-8800  
E-Mail: [dbengston@stinson.com](mailto:dbengston@stinson.com)

*Attorneys for Defendant PostRock Energy Corporation,  
f/k/a Quest Cherokee, LLC*

By: /s/ Charles E. Millsap  
Charles E. Millsap, #09692