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IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF WYOMING

Michele Navarro, on behalf of herself and all others similarly situated, Plaintiff, v. Anschutz Exploration Corporation, Defendant.	Civil Action No. 25-CV-93-ABJ

CLASS REPRESENTATIVE'S MOTION FOR APPROVAL OF FINAL PLAN OF ALLOCATION AND ENTRY OF DISTRIBUTION ORDER

Pursuant to the Settlement Agreement (Doc. 31-1) and the Initial Plan of Allocation Order (Doc. 46), Class Representative files this Motion for Approval of Final Plan of Allocation and Entry of Distribution Order.[1] In support of this Motion, Class Representative shows the Court the following:

1. On July 30, 2026, the Court entered several orders (collectively, the "Orders") related to approval of the Settlement:

[1] All capitalized terms not otherwise defined in this Motion shall have the same meanings ascribed to them in the Settlement Agreement.

a. the Judgment granting final approval of the Settlement (Doc. 45) ("Judgment");

b. the Initial Plan of Allocation Order (Doc. 46); and

c. the Order Awarding Plaintiff's Attorneys' Fees, Litigation Expenses, Administration, Notice, and Distribution Costs, and Case Contribution Award (Doc. 47) (the "Fee and Expense Order").

2. Under the Orders and the Settlement Agreement, Class Representative is required to file and seek approval of a final plan of allocation and entry of a distribution order to disburse the Net Settlement Fund to Class Members. This Motion seeks that approval.

3. Class Representative has calculated a Final Plan of Allocation that takes into account the Gross Settlement Fund ($10.75 million), plus accrued interest while in the Escrow Account, and subtracts the amounts awarded in the Fee and Expense Order and the gross amounts attributable to the opt-outs approved by the Court in the Judgment.

4. The result is Class Representative's proposed Final Plan of Allocation, which is attached to this Motion as **Exhibit 1**.

5. The proposed Final Plan of Allocation shows the proportionate settlement payments to be made to Class Members, or credited to their escrow account, in accordance with the Allocation Methodology previously approved by the Court.

6. Upon the Court's approval, the distributions set out in the Final Plan of Allocation will be made to Class Members in accordance with the Orders and the Settlement Agreement. To effectuate distribution, the Escrow Agent will transfer all funds from the Escrow Account to a distribution account managed by the Settlement Administrator for further administration and distribution.

7. Class Representative respectfully requests that the Court enter the proposed Final Plan of Allocation and Distribution Order in the form attached as **Exhibit 2**. Class Representative will also submit a native version of the proposed order.

Respectfully Submitted,

/s/ Reagan E. Bradford

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CLASS COUNSEL

CERTIFICATE OF SERVICE

I hereby certify that on October 30, 2026, a true and correct copy of the above and foregoing document was served in accordance with the Local Rules on all counsel of record via the Court's electronic filing system.

/s/ Reagan E. Bradford
Reagan E. Bradford