

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re: CHESAPEAKE ENERGY CORPORATION, <i>et al.</i> , ¹ Reorganized Debtors.	§ § § § § § § §	Chapter 11 Case No. 20-33233 (DRJ) (Jointly Administered) Re: Docket No. 3677
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**DECLARATION OF MICHAEL BECHTEL IN SUPPORT
OF REORGANIZED DEBTORS’ SEVENTEENTH OMNIBUS OBJECTION (NO
LIABILITY) TO CLAIMS [CLAIM NO. 1310]**

I, Mike Bechtel, hereby declare under penalty of perjury:

1. I am a Sr. Manager – Operations Accounting with Chesapeake Energy Corporation (“Chesapeake”), a corporation organized under the laws of Oklahoma and one of the above-captioned reorganized debtors (before the Effective Date of the Plan, the “Debtors,” and after the Effective Date of the Plan, the “Reorganized Debtors”). Before joining Chesapeake, I was the Director of Merchandise Payables for Fleming Companies and employed from 1994 to 2003, where I also help positions in Internal Audit and Divisional Chief Accountant. My duties with Chesapeake include the management and oversight of the Accounts Payable and Joint Venture Accounting processes. I am generally familiar with the Reorganized Debtors’ day-to-day operations, financing arrangements, business affairs, and books and records that reflect, among other things, the Reorganized Debtors’ liabilities as of the Petition Date. I have reviewed the *Reorganized Debtors’ Seventeenth Omnibus Objection to Certain Proofs of Claim (No Liability*

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases may be obtained on the website of the Reorganized Debtors’ claims and noticing agent at <https://dm.epiq11.com/chesapeake>. The location of Reorganized Debtor Chesapeake Energy Corporation’s principal place of business and the Reorganized Debtors’ service address in these chapter 11 cases is 6100 North Western Avenue, Oklahoma City, Oklahoma 73118.

Claims) [Docket No. 3677] (the “Seventeenth Omnibus Objection”),² Proof of Claim No. 1310 (the “Sartori Claim”), and the response and supporting documentation submitted by Donald Sartori (the “Claimant”).

Proof of Claim No. 1310

2. I have reviewed the supporting documentation submitted by the Claimant to counsel for the Reorganized Debtors in response to the Seventeenth Omnibus Objection. I believe the supporting documentation reflects the Claimant’s asserted ownership of Chesapeake stock, rather than a claim against one or more of the Debtors. As such, I believe Proof of Claim No. 1310 should be reclassified as a proof of interest.

3. Failure to appropriately classify Proof of Claim No. 1310 would entitle the Claimant to a recovery on account of such “claim” to which such claimant is not entitled. I believe that the reclassification of Proof of Claim No. 1310 as an “interest” is appropriate.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the facts set forth in the foregoing declaration are true and correct to the best of my knowledge, information and belief as of the date hereof.

Dated: August 20, 2021

/s/ Mike Bechtel

Mike Bechtel
Sr. Manager – Operations Accounting
Chesapeake Energy Corporation

² Capitalized terms used but not otherwise defined herein shall have the same meaning ascribed to them in the Seventeenth Omnibus Objection.