

ENTERED

July 09, 2025

Nathan Ochsner, Clerk

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

<p>In re:</p> <p>CHESAPEAKE EXPLORATION, L.L.C.,¹</p> <p style="text-align:right">Reorganized Debtor.</p>	<p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p>	<p>Chapter 11</p> <p>Case No. 20-33239 (CML)</p> <p>(formerly Jointly Administered under Lead Case Chesapeake Energy Corporation, Case No. 20-33233)</p>
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**STIPULATION AND AGREED ORDER BETWEEN
(I) THE REORGANIZED DEBTORS, (II) J. FLEET OIL & GAS
PRODUCTION COMPANY, L.L.C., AND (III) MARTIN PRODUCING LLC**

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”), J. Fleet Oil & Gas Production Company, L.L.C. (“J. Fleet”), and Martin Producing LLC (“Martin” and together with the Reorganized Debtors and J. Fleet, the “Parties”) enter this stipulation and agreed order (the “Stipulation”) as follows:

WHEREAS, on June 28, 2020 (the “Petition Date”), the Debtors filed voluntary petitions for relief under chapter 11 of the United States Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Texas (the “Bankruptcy Court”);

WHEREAS, on January 16, 2021, the Bankruptcy Court entered an order [Docket No. 2915, Case No. 20-33233] (the “Confirmation Order”) confirming the Debtors’ *Fifth Amended Joint Plan of Reorganization Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 2833,

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 Debtors’ service address in these chapter 11 cases is 6100 North Western Avenue, Oklahoma City, Oklahoma 73118.

Case No. 20-33233] (as the same may have been modified, supplemented, and amended, and including all supplements and exhibits thereto, the “Plan”);²

WHEREAS, Article III of the Plan states that treatment under the Plan of an Allowed Claim shall be “in full and final satisfaction, settlement, release, and discharge of” such holders’ Allowed Claim;

WHEREAS, the effective date of the Plan is February 9, 2021 [Docket No. 3058, Case No. 20-33233] (the “Effective Date”);

WHEREAS, prior to the Petition Date, on October 2, 2015, J. Fleet brought an action against certain of the Debtors in the lawsuit styled *J. Fleet Oil & Gas Production Corporation, L.L.C. et al. v. Chesapeake Louisiana, L.P. et al.*, Case No. 5:15-cv-02461 (the “Lawsuit”) in the United States District Court for the Western District of Louisiana, Shreveport Division (the “District Court”);

WHEREAS, on May 3, 2016, Martin was added as a named party to the Lawsuit;

WHEREAS, on October 30, 2020, J. Fleet and Martin (together, the “Claimants”) filed ten proofs of claim against certain Debtors on account of the Lawsuit seeking recovery for damages accruing prior to February 9, 2021, of which only two claims remain:³ (a) Proof of Claim No. 3993 filed by J. Fleet against Debtor Chesapeake Louisiana, L.P. in the amount of \$1,691,359.55 (“Claim No. 3993”); and (b) Proof of Claim No. 3994 filed by Martin against Debtor Chesapeake

² Capitalized and undefined terms in this Stipulation shall have the meanings ascribed to them in the Plan.

³ The other eight proofs of claim filed by Claimants (Proofs of Claim Nos. 3642, 12976, 4224, 12968, 3644, 4014, 4016, and 4225) have been disallowed pursuant to Bankruptcy Court orders. *See* [Docket No. 3437; Case No. 20-33233]; [Docket No. 3557; Case No. 20-33233]; [Docket No. 731].

Louisiana, L.P. in the amount of \$1,691,359.55 (“Claim No. 3994,” and together with Claim No. 3993, the “Claims”);

WHEREAS, on March 31, 2025, the Reorganized Debtors filed *Reorganized Debtors’ Fortieth Omnibus Objection to Certain Proofs of Claim (No Liability Claims)* [Docket No. 793] (the “Objection”);

WHEREAS, on April 30, 2025, Claimants filed their *Response by J. Fleet Oil & Gas Production Company, L.L.C. and Martin Producing, L.L.C. to the Reorganized Debtors’ Fortieth Omnibus Objection to Certain Proofs of Claim* [Docket No. 809] (the “Response”);

WHEREAS, the Parties have consensually agreed, after good faith, arm’s-length negotiations, to resolve the Claims, Objection, and Response pursuant to the terms herein.

NOW, THEREFORE, in consideration of the foregoing recitals, which are incorporated into this Stipulation, the Parties hereby stipulate and agree as follows:

1. The Claims are hereby disallowed.
2. The Objection is withdrawn.
3. The Response is withdrawn.
4. Claimants may continue the Lawsuit upon amending the complaint to pursue only claims and damages accruing from payments allegedly due to Claimants beginning on or after the Effective Date, and shall amend their pleadings in the Lawsuit solely to dismiss with prejudice all requests for relief with respect to the Claims and any causes of action against the Reorganized Debtors that arose before the Effective Date that have not previously been asserted in the Lawsuit. For the avoidance of doubt, all orders, rulings, and judgments rendered in the Lawsuit shall be unaffected.

5. Upon entry of this Stipulation, Epiq Corporate Restructuring, LLC is hereby authorized and directed to amend or remove the Proof of Claim from the Official Claims Register to reflect the terms herein without prejudice to the rights described and reserved in this Stipulation.

6. The entry of this Stipulation and the treatment herein fully and finally resolves the Claims, and Claimants fully and finally release the Reorganized Debtors and their affiliates, officers and employees with respect to the Claims.

7. For the avoidance of doubt, nothing herein releases the Reorganized Debtors from claims held by the Claimants for damages accruing beginning on or after the Effective Date, if any, which Reorganized Debtors admit constitute post-Effective Date claims not arising under or in a cause under Title 11, not pertaining to the implementation or execution of the plan, and not subject to “related to” jurisdiction of this Court (the “Post-Effective Date Claims”). Reorganized Debtors expressly waive any right to assert any bankruptcy related defenses to the Post-Effective Date Claims, including, without limitation, in the Lawsuit described in Paragraph 4, but reserve all their rights and defenses in connection with the Lawsuit, including with respect to the Post-Effective Date Claims, under applicable non-bankruptcy law.

8. The Parties hereby agree that each party shall bear its own costs and attorneys’ fees and other expenses incurred related to the Claims, the Objection, the Response, and this Stipulation.

9. Neither this Stipulation nor any negotiations and writings in connection with this Stipulation are intended to, or shall be construed to: (a) be evidence of or an admission on behalf of either Party regarding any claim, right or defense that such Party may have against the other Party; or (b) waive or otherwise modify any releases, exculpation, injunction, and discharge provided in the Plan or by operation of the Bankruptcy Code, all except to the extent of the Post-

Effective Date Claims as explicitly provided in this Stipulation, including, without limitation, in paragraph 7.

10. The terms of this Stipulation are immediately effective and enforceable upon its entry.

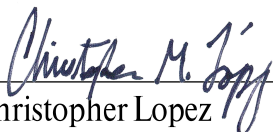
11. The Stipulation is intended by the Parties to be binding upon their successors, agents, assigns, and any parent, subsidiary, or affiliated entity of the Parties.

12. The undersigned hereby represent and warrant they have full authority to execute this Stipulation on behalf of the respective Parties and that the respective Parties have full knowledge of, and have consented to, this Stipulation. Claimants represent that they have not sold, pledged, conveyed, assigned, or otherwise transferred any part of the Claims, or any right, interest, or cause of action they may have against the Reorganized Debtors related to the Lawsuit, including the Claims.

13. This Stipulation shall not be modified, altered, amended, or supplemented except by a writing executed by the Parties.

14. The Court retains jurisdiction with respect to all matters arising from or related to the interpretation, implementation or enforcement of this Stipulation, except as to the Post-Effective Date Claims.

Signed: July 09, 2025



Christopher Lopez
United States Bankruptcy Judge

Dated: July 8, 2025

/s/ J. Machir Stull

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*Attorneys for J. Fleet Martin Oil & Gas Production
Company, L.L.C. and Martin Producing, L.L.C.*

United States Bankruptcy Court
Southern District of Texas

In re:
Chesapeake Exploration, L.L.C.
Debtor

Case No. 20-33239-cml
Chapter 11

CERTIFICATE OF NOTICE

District/off: 0541-4
Date Rcvd: Jul 09, 2025

User: ADIuser
Form ID: pdf002

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Total Noticed: 29

The following symbols are used throughout this certificate:

Symbol **Definition**

+ Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Jul 11, 2025:

Recip ID	Recipient Name and Address
cr	+ Danielle Hicks, c/o Charles E. Lauffer, Jr., 821 ESE Loop 323, Suite 530, Tyler, TX 75701 UNITED STATES 75701-9779
cr	+ Dilworth Group, c/o Person Mohrer Morales Boddy Garcia &, Gutierrez, PLLC, 8610 Broadway, Suite 440, San Antonio, TX 78217-6355
cr	Donald K Natale, 142 Naples St, Corpus Christi, TX 78404-1829
cr	+ Gates Mineral Company, Ltd. and related entities, c/o Luttrell and Carmody Law Group, One International Centre, 100 N.E. Loop 410, Suite 615 San Antonio, TX 78216-4713
cr	+ Harold Glenn Speer, 829 Setliff Place, 829, Nashville, TN 37206, UNITED STATES 37206-2545
cr	+ Haynes Mineral Trust, Person Mohrer Morales Boddy Garcia, & Gutierrez, PLLC, 8610 Broadway, Suite 440, San Antonio, TX 78217 UNITED STATES 78217-6355
cr	+ J. Fleet Oil & Gas Production Company, L.L.C., Bradley Murchison, 401 Edwards Street, Suite 1000, Shreveport, La 71101-5529
cr	+ John N. Tyler, c/o Holly C. Hamm, Snow & Green LLP, P.O. Box 549, Hockley, TX 77447-0549
cr	+ Joy Chittim, c/o William R. Davis, Jr., Langley & Banack, Inc., 745 E. Mulberry Ave., Suite 700, San Antonio, TX 78212 UNITED STATES 78212-3172
cr	+ Lawrence Macicek, 716 Columbia Street, Houston, TX 77007, UNITED STATES 77007-1635
cr	+ Leojua, Ltd., c/o Person Mohrer Morales Boddy Garcia &, Gutierrez, PLLC, 8610 Broadway, Suite 440, San Antonio, TX 78217-6355
cr	+ Linda Hopkins Steele, 313 Rebekah Dr, Olathe, CO 81425-1749
cr	+ Luba Casualty Insurance Company, c/o John Akard Jr., 11111 McCracken, Suite A, Cypress, TX 77429-4458
cr	+ Martin Producing, L.L.C., Bradley Murchison, 401 Edwards Street, Suite 1000, Shreveport, La 71101-5529
cr	+ Pine Hollow Farm, Ltd., c/o Chrysanthe E. Vassiles, 220 Market Ave. S, Suite 1000, Canton, OH 44702-2171
cr	+ Pine Hollow Resources, LLC, c/o Chrysanthe E. Vassiles, 220 Market Ave. S, Suite 1000, Canton, OH 44702-2171
intp	+ Plaintiffs in A & B Campbell Family LLC Litigation, c/o Indik & McNamara, P.C., 123 South Broad St., Suite 1200, Philadelphia, PA 19109-1024
intp	+ Stefanie Delasandro, 6051 Rye Loop, Bryan, TX 77807-8641
cr	+ The Douglas L. Houck Revocable Trust aka The Dougl, c/o Chrysanthe E. Vassiles, Black McCuskey Souers & Arbaugh, LPA, 220 Market Ave. S, Suite 1000 Canton, OH 44702-2171
cr	+ Thomas Pierce, 1045 Cheshire Lane, Houston, TX 77018, UNITED STATES 77018-2026
intp	+ Timothy Delasandro, 6051 Rye Loop, Bryan, TX 77807-8641
cr	+ Wyoming Department of Revenue, 122 West 25th Street, Cheyenne, WY 82002-0001

TOTAL: 22

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
db	+ Email/Text: bankruptcy.mailbox@chk.com	Jul 09 2025 20:04:00	Chesapeake Exploration, L.L.C., 6100 North Western Avenue, Oklahoma City, OK 73118-1044
cr	+ Email/Text: adb@bymanlaw.com	Jul 09 2025 20:05:00	Allison Byman Trustee, 7924 Broadway, Suite 104, Pearland, TX 77581-7933
cr	+ Email/Text: rjnaus@wwmlaw.com	Jul 09 2025 20:05:00	Caddo Parish, c/o R. Joseph Naus, 330 Marshall St, Suite 1000, Shreveport, LA 71101-3016
cr	Email/Text: ExternalRecovery@gartner.com	Jul 09 2025 20:05:00	Gartner, Inc., c/o Shipman & Goodwin LLP, One Constitution Plaza, Hartford, CT 06013
cr	+ Email/PDF: PRA_BK2_CASE_UPDATE@portfoliorecovery.com	Jul 09 2025 20:25:27	PRA Receivables Management, LLC, PO Box 41021, Norfolk, VA 23541-1021
cr	+ Email/Text: dallas.bankruptcy@LGBS.com	Jul 09 2025 20:06:00	Parker CAD, Linebarger Goggan Blair & Sampson, LLP, c/o Laurie A Spindler, 2777 N Stemmons Frwy Ste 1000, Dallas, tx 75207-2328

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Form ID: pdf002

Page 2 of 2
Total Noticed: 29

cr + Email/Text: notifications@cstrial.com

Jul 09 2025 20:05:00

Robert Reyes, c/o Cain & Skarnulis PLLC, 303
Colorado St., Ste. 2850, Austin, TX 78701-0137

TOTAL: 7

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
aty		Bryan N.B. King
cr		Babette Landry
intp		Branden Margolis
cr		Christopher Landry
cr		EJS Investments Holdings, LLC, c/o Joshua Austin
intp		Eric Petroleum Corporation
cr		Healthcare of Ontario Pension Trust Fund (HOOPP)
intp		Jackson Walker LLP
intp		Linda Hopkins Steele
intp		MEC Class Plaintiffs
cr		Mary Ann Wheeler Family Limited Partnership
cr		Murphy Exploration & Production Company-USA
intp		Non-MEC Class Plaintiffs
intp		Petty Business Enterprises, LP, Petty Energy L.P.
cr		Roberto Villarreal

TOTAL: 15 Undeliverable, 0 Duplicate, 0 Out of date forwarding address

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Jul 11, 2025

Signature: /s/Gustava Winters