

ENTERED

October 06, 2025

Nathan Ochsner, Clerk

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

In re: CHESAPEAKE EXPLORATION, L.L.C., ¹ Reorganized Debtor.	§ § § § § § § §	Chapter 11 Case No. 20-33239 (CML) (formerly Jointly Administered under Lead Case Chesapeake Energy Corporation, Case No. 20-33233)
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**STIPULATION AND AGREED ORDER RESOLVING
PROOF OF CLAIM NOS. 3963, 3975, 4103, AND 4104**

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”) and Paul M. Davis (the “Claimant” and together with the Reorganized Debtors, 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 October 29, 2020, the Claimant filed Proof of Claim No. 4103² against Chesapeake Operating, L.L.C. (“Claim 4103”), and on October 30, 2020, Claimant filed Proof of

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.

² Pursuant to the Court’s *Order Approving Epiq Corporate Restructuring, LLC as Claims, Noticing, Solicitation, and Administrative Agent, Effective as of June 28, 2010* [Docket No. 109, Case 20-33233] (the “Epiq Retention Order”), Epiq Corporate Restructuring, LLC (“Epiq”) maintains the official Claims Register in these chapter 11 cases and is the authorized repository for all proofs of claim filed in these chapter 11 cases. Claim 4103 was originally filed in the Court’s claims register through CM/ECF and was assigned claim number 57-1 in Case No. 20-33249.

Claim No. 4104³ against Chesapeake Operating, L.L.C., amending Claim 4103 and asserting a prepetition unliquidated unsecured claim (“Claim 4104”);

WHEREAS, on October 29, 2020, the Claimant filed Proof of Claim No. 3963⁴ against Chesapeake Louisiana, L.P. (“Claim 3963”), and on October 30, 2020, Claimant filed Proof of Claim No. 3975⁵ against Chesapeake Louisiana, L.P., amending Claim 3963 and asserting a prepetition unliquidated unsecured claim (“Claim 3975”);

WHEREAS, on January 16, 2021, the Bankruptcy Court entered an order [Docket No. 2915] (the “Confirmation Order”) confirming the Debtors’ *Fifth Amended Joint Chapter 11 Plan of Reorganization* [Docket No. 2833] (as the same may have been modified, supplemented, and amended, and including all supplements and exhibits thereto, the “Plan”);⁶

WHEREAS, the Parties have consensually agreed, after good faith, arm’s-length negotiations, to resolve the Claims 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. Claim 4103, Claim 4104, Claim 3963, and Claim 3975 (collectively, the “Claims”) are hereby withdrawn.
2. Except that the Claims are withdrawn and are stipulated to be resolved as provided herein, Claimant retains all rights as provided under the Plan and the Confirmation Order,

³ See *supra* note 2. Claim 4104 was originally filed in the Court’s claims register through CM/ECF and was assigned claim number 57-2 in Case No. 20-33249.

⁴ See *supra* note 2. Claim 3963 was originally filed in the Court’s claims register through CM/ECF and was assigned claim number 5-1 in Case No. 20-33242.

⁵ See *supra* note 2. Claim 3975 was originally filed in the Court’s claims register through CM/ECF and was assigned claim number 5-2 in Case No. 20-33242.

⁶ Capitalized and undefined terms in this Stipulation shall have the meanings ascribed to them in the Plan.

including, but not limited to, all such rights related to Royalty and Working Interests held by Claimant, including Royalty and Working Interests identified in the Claims. Such rights include, but are not limited to, rights provided in relation to Royalty and Working Interests in Article IV.T of the Plan.

3. Consistent with Article IV.T of the Plan and paragraph 270 of the Confirmation Order, the Debtors or the Reorganized Debtors, as applicable, shall continue paying Claimant all undisputed amounts owing on account of his respective Royalty and Working Interests, including funds held or booked or deemed to be held in suspense, as and when reconciled, in the ordinary course of business, and in accordance with all applicable agreements and laws, without any further action on the part of Claimant.

4. Upon entry of this Stipulation, Epiq Corporate Restructuring, LLC is hereby authorized and directed to mark the Claims as withdrawn on the Official Claims Register to reflect the terms herein, without prejudice to the rights described and reserved in this Stipulation.

5. The entry of this Stipulation and the treatment herein fully and finally resolves the Claims.

6. For the avoidance of doubt, the entry of this Stipulation does not modify or prejudice the provisions in paragraph 268 of the Confirmation Order, *i.e.*, that Claimant shall not be considered “Releasing Parties” under the Plan, as defined therein in Article I.A.144, and discussed in Article VIII.

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

8. 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, except as explicitly provided herein.

9. The terms of this Stipulation will be immediately effective and enforceable upon its entry.


10. 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.

11. 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. The Claimant represents that he has not sold, pledged, conveyed, assigned, or otherwise transferred any part of any of the Claims, or any right, interest, or cause of action it may have against the Reorganized Debtors related to the Claims.

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

13. The Court retains jurisdiction with respect to all matters arising from or related to the interpretation, implementation or enforcement of this Stipulation.

Signed: October 06, 2025



Christopher Lopez
United States Bankruptcy Judge

STIPULATED AND AGREED ON OCTOBER 3, 2025:

/s/ Victoria Argeroplos

JACKSON WALKER LLP

Matthew D. Cavanaugh (TX Bar No. 24062656)

Kristhy M. Peguero (TX Bar No. 24102776)

J. Machir Stull (TX Bar No. 24070697)

Victoria Argeroplos (TX Bar No. 24105799)

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Co-Counsel to the Reorganized Debtors

- and -

WIENER, WEISS & MADISON,

A Professional Corporation

By: */s/ Patrick L. McCune*

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Email: pmccune@wwmlaw.com

Counsel for Claimant

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
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User: ADIuser
Form ID: pdf002

Page 1 of 5
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 Oct 08, 2025:

Recip ID	Recipient Name and Address
cr	+ Allison Byman Trustee, 7924 Broadway, Suite 104, Pearland, TX 77581-7933
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: 23

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	Oct 06 2025 20:09:00	Chesapeake Exploration, L.L.C., 6100 North Western Avenue, Oklahoma City, OK 73118-1044
cr	+ Email/Text: rjnaus@wwmlaw.com	Oct 06 2025 20:10:00	Caddo Parish, c/o R. Joseph Naus, 330 Marshall St, Suite 1000, Shreveport, LA 71101-3016
cr	Email/Text: ExternalRecovery@gartner.com	Oct 06 2025 20:09:00	Gartner, Inc., c/o Shipman & Goodwin LLP, One Constitution Plaza, Hartford, CT 06013
cr	+ Email/PDF: PRA_BK2_CASE_UPDATE@portfoliorecovery.com	Oct 06 2025 20:28:15	PRA Receivables Management, LLC, PO Box 41021, Norfolk, VA 23541-1021
cr	+ Email/Text: dallas.bankruptcy@LGBS.com	Oct 06 2025 20:10:00	Parker CAD, Linebarger Goggan Blair & Sampson, LLP, c/o Laurie A Spindler, 2777 N Stemmons Frwy Ste 1000, Dallas, tx 75207-2328
cr	+ Email/Text: notifications@cstrial.com	Oct 06 2025 20:10:00	Robert Reyes, c/o Cain & Skarnulis PLLC, 303

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Date Rcvd: Oct 06, 2025

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Page 2 of 5
Total Noticed: 29

Colorado St., Ste. 2850, Austin, TX 78701-0137

TOTAL: 6

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: Oct 08, 2025

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on October 6, 2025 at the address(es) listed below:

Name	Email Address
Albert M. Gutierrez	on behalf of Creditor Haynes Mineral Trust amg@pmbglaw.com cmacdiarmid@pmbglaw.com
Albert M. Gutierrez	on behalf of Creditor Leojua Ltd. amg@pmbglaw.com, cmacdiarmid@pmbglaw.com
Albert M. Gutierrez	on behalf of Creditor Dilworth Group amg@pmbglaw.com cmacdiarmid@pmbglaw.com
Albert M. Gutierrez	on behalf of Creditor Gates Mineral Company Ltd. and related entities amg@pmbglaw.com, cmacdiarmid@pmbglaw.com
Alicia Lenae Barcomb	on behalf of U.S. Trustee US Trustee alicia.barcomb@usdoj.gov
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Aubrey L. Thomas	

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Form ID: pdf002

Page 3 of 5
Total Noticed: 29

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Chrysanthe E Vassiles
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James Hunter Nye
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Page 4 of 5
Total Noticed: 29

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Victoria Nicole Argeroplos

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Page 5 of 5

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TOTAL: 59