

**ENTERED**

November 12, 2025

Nathan Ochsner, Clerk

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

---

|  |   |                                      |
|--|---|--------------------------------------|
| In re:                                       | § | Chapter 11                           |
|  | § |                                      |
| CHESAPEAKE EXPLORATION, L.L.C., <sup>1</sup> | § | Case No. 20-33239 (CML)              |
|  | § |                                      |
| Reorganized Debtor.                          | § | (formerly Jointly Administered under |
|  | § | Lead Case Chesapeake Energy          |
|  | § | Corporation, Case No. 20-33233)      |

---

**STIPULATION AND AGREED ORDER  
RESOLVING PROOF OF CLAIM NOS. 3973 AND 4119**

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 Coughatta Bayou Land Company, L.L.C. (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 30, 2020, the Claimant filed Proof of Claim No. 3973 against Chesapeake Louisiana, L.P. asserting an unliquidated unsecured claim (“Claim 3973”).<sup>2</sup>

---

<sup>1</sup> 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.

<sup>2</sup> 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 3973 was originally filed in the Court’s claims register through CM/ECF and was assigned claim number 7-2 in Case No. 20-33242.

**WHEREAS**, on October 30, 2020, Claimant filed Proof of Claim No. 4119 against Chesapeake Operating, L.L.C. asserting an unliquidated unsecured claim (“Claim 4119”).<sup>3</sup>

**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”);<sup>4</sup>

**WHEREAS**, the Parties have consensually agreed, after good faith, arm’s-length negotiations, to resolve Claim 3973 and Claim 4119 (collectively, 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 3973 and Claim 4119 are withdrawn.
2. Except that the Claims are withdrawn and stipulated to be resolved as provided herein, Claimant retains all rights as provided under the Plan and the Confirmation Order, 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 its respective Royalty and Working Interests, including

---

<sup>3</sup> See *supra* note 2. Claim 4119 was originally filed in the Court’s claims register through CM/ECF and was assigned claim number 60-2 in Case No. 20-33249.

<sup>4</sup> Capitalized and undefined terms in this Stipulation shall have the meanings ascribed to them in the Plan.

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 a “Releasing Party” 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 are immediately effective and enforceable upon its entry.

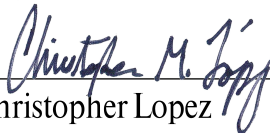
10. The Stipulation is intended by the Parties to be binding upon their successors, agents, assigns, and any parent, subsidiary, or affiliated entity of the Parties.

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 it has not sold, pledged, conveyed, assigned, or otherwise transferred any part 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: November 12, 2025

  
\_\_\_\_\_  
Christopher Lopez  
United States Bankruptcy Judge

**STIPULATED AND AGREED ON NOVEMBER 10, 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)

1401 McKinney Street, Suite 1900

Houston, Texas 77010

Telephone: (713) 752-4200

Facsimile: (713) 752-4221

Email: [mcavanaugh@jw.com](mailto:mcavanaugh@jw.com)

[kpeguero@jw.com](mailto:kpeguero@jw.com)

[mstull@jw.com](mailto:mstull@jw.com)

[vargeroplos@jw.com](mailto:vargeroplos@jw.com)

*Co-Counsel to the Reorganized Debtors*

**- and -**

WIENER, WEISS & MADISON,

A Professional Corporation

By: */s/ Patrick L. McCune*

Patrick L. McCune (TX Bar No. 24090985)

Wiener, Weiss & Madison,

A Professional Corporation

445 Louisiana Avenue

Baton Rouge, LA 70802

Telephone: 225-910-8084

Facsimile: 225-910-8082

Email: [pmccune@wwmlaw.com](mailto: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

User: ADIuser

Page 1 of 2

Date Rcvd: Nov 12, 2025

Form ID: pdf002

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 Nov 14, 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               | Nov 12 2025 22:23:00 | Chesapeake Exploration, L.L.C., 6100 North Western Avenue, Oklahoma City, OK 73118-1044   |
| cr       | + Email/Text: rjnaus@wwmlaw.com                        | Nov 12 2025 22:25:00 | Caddo Parish, c/o R. Joseph Naus, 330 Marshall St, Suite 1000, Shreveport, LA 71101-3016  |
| cr       | Email/Text: ExternalRecovery@gartner.com               | Nov 12 2025 22:24:00 | Gartner, Inc., c/o Shipman & Goodwin LLP, One Constitution Plaza, Hartford, CT 06013  |
| cr       | + Email/PDF: PRA_BK2_CASE_UPDATE@portfoliorecovery.com | Nov 12 2025 22:33:49 | PRA Receivables Management, LLC, PO Box 41021, Norfolk, VA 23541-1021   |
| cr       | + Email/Text: dallas.bankruptcy@LGBS.com               | Nov 12 2025 22:26:00 | 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                | Nov 12 2025 22:25:00 | Robert Reyes, c/o Cain & Skarnulis PLLC, 303  |

District/off: 0541-4  
Date Rcvd: Nov 12, 2025

User: ADIuser  
Form ID: pdf002

Page 2 of 2  
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: Nov 14, 2025

Signature:           /s/Gustava Winters