

Robert P. Schuster (Bar No. 4-1137)  
Bradley L. Booke (Bar No. 5-1676)  
Robert P. Schuster P.C.  
P.O. Box 13160  
250 Veronica Lane, Suite 204  
Jackson, WY 83002  
Telephone: 307.732.7800  
[bob@bobschuster.com](mailto:bob@bobschuster.com)  
[brad@bobschuster.com](mailto:brad@bobschuster.com)  
Attorneys for Plaintiffs

Samuel Issacharoff (*pro hac vice*)  
40 Washington Square South  
New York, New York 10012  
Telephone: 212.998.6580  
[si13@nyu.edu](mailto:si13@nyu.edu)  
Attorney for Plaintiffs

Robert Klonoff  
2425 S.W. 76th Avenue  
Portland, Oregon 97225  
Telephone: 503.702.0218  
[klonoff@usa.net](mailto:klonoff@usa.net)  
Attorney for Plaintiffs

J.N. Murdock (Bar No. 5-1629)  
Murdock Law Firm, LLC  
1551 Three Crowns Drive, Suite 314  
Casper, Wyoming 82604  
Telephone: 307.333.5444  
[jnmurdock@murdocklawfirm.com](mailto:jnmurdock@murdocklawfirm.com)  
Attorney for Plaintiffs

Laurence O. Masson (*pro hac vice*)  
Law Office of  
Laurence O. Masson  
2625 Alcatraz Avenue, # 206  
Berkeley, California 94705-2702  
Telephone: 510.735.9691  
[lomlex@gmail.com](mailto:lomlex@gmail.com)  
Attorney for Plaintiffs

Thomas N. Long (Bar No. 5-1550)  
Aaron J. Lyttle (Bar No. 7-4726)  
Kaylee A. Harmon (Bar No. 7-6308)  
Long Reimer Winegar LLP  
P.O. Box 87  
2120 Carey Ave., Suite 300  
Cheyenne, WY 82003  
Telephone: 307.635.0710  
Fax: 307.635.0413  
[tlong@lrw-law.com](mailto:tlong@lrw-law.com)  
[alyttle@lrw-law.com](mailto:alyttle@lrw-law.com)  
[kharmon@lrw-law.com](mailto:kharmon@lrw-law.com)  
Attorneys for Plaintiffs

Cody L. Balzer (Bar No. 6-2931)  
Balzer Law Firm, P.C.  
1302 Cleveland Avenue  
Loveland, CO 80537  
Telephone: 970.203.1515  
[cody@balzerlaw.com](mailto:cody@balzerlaw.com)  
Attorney for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF WYOMING**

Anita C. Deselms, et al.,

Class Representatives,

v.

Occidental Petroleum Corporation, et al.,

Defendants.

Civil Action No. 19-CV-243-KHR

**CLASS REPRESENTATIVES' UNOPPOSED MOTION TO CERTIFY THE  
SETTLEMENT CLASS FOR SETTLEMENT PURPOSES, TO  
PRELIMINARILY APPROVE THE CLASS ACTION SETTLEMENT,  
TO APPOINT PRESENT CLASS REPRESENTATIVES AS SETTLEMENT  
CLASS REPRESENTATIVES, TO PRELIMINARILY APPOINT PRESENT  
CLASS COUNSEL AS SETTLEMENT CLASS COUNSEL, TO APPROVE THE  
FORM AND MANNER OF NOTICE, TO APPOINT A DEPOSIT ESCROW  
AGENT AND A DISTRIBUTION ESCROW AGENT, AND TO SET A DATE  
FOR A FINAL APPROVAL HEARING**

The Class Representatives move the Court, under Fed. R. Civ. P. 23(e), to certify the Settlement Class, to preliminarily approve the Class Action Settlement, to approve the form of notice to the Settlement Class, to provisionally appoint present Class Representatives as

Settlement Class Representatives, to provisionally appoint present Class Counsel as Settlement Class Counsel, to appoint a Deposit Escrow Agent to receive Defendants' deposit of Twelve Million Dollars (\$12,000,000), and to appoint a Distribution Escrow Agent. Further, though the Court previously certified a class pursuant to the *Order Certifying Class Pursuant to Fed. R. Civ. P. 23(c)(4)* (ECF 227), the Class Representatives request the Court provide putative Settlement Class members with a further opportunity to request exclusion from the Settlement Class and offer objection to the Settlement Class, and ordering deadlines and conditions under which putative Settlement Class members may request exclusion from the Settlement Class or object to the Settlement Class. Finally, the Class Representatives request the Court set a date for a final fairness hearing as required by Fed. R. Civ. P. 23(e).

This Motion is supported by the Brief filed contemporaneously herewith—as well as the exhibits attached to it.

Class Representatives and Defendants have agreed to the form of the *Preliminary Order* to be agreed upon by the Court as part of the *Settlement Agreement*. The form of the Preliminary Approval Order is attached to this Motion as Exhibit 1. Class Representatives have also submitted a Word version of agreed *Preliminary Approval Order* to the Court contemporaneously with filing this Motion.

Respectfully submitted this 4th day of October, 2024.

/s/ Kaylee A. Harmon

Kaylee A. Harmon

Long Reimer Winegar LLP

J.N. Murdock

Murdock Law Firm, LLC

**COUNSEL FOR CLASS  
REPRESENTATIVES**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 4th day of October 2024, a true and correct copy of the foregoing was served in the manner indicated below:

Barrett H. Reasoner	<input type="checkbox"/>	U.S. Mail, Postage Prepaid
Ross M. MacDonald	<input type="checkbox"/>	Express Mail
Kathy D. Patrick	<input type="checkbox"/>	Hand Delivery
Mark Doré	<input type="checkbox"/>	Fax Transmission
Michael Davis	<input type="checkbox"/>	Federal Express
Gibbs Bruns, LLP	<input checked="" type="checkbox"/>	Electronic Transmission

1100 Louisiana Street, #5300  
Houston, Texas 77002  
[breasoner@gibbsbruns.com](mailto:breasoner@gibbsbruns.com)  
[rmacdonald@gibbsbruns.com](mailto:rmacdonald@gibbsbruns.com)  
[kpatrick@gibbsbruns.com](mailto:kpatrick@gibbsbruns.com)  
[mdore@gibbsbruns.com](mailto:mdore@gibbsbruns.com)  
[mdavis@gibbsbruns.com](mailto:mdavis@gibbsbruns.com)  
*Attorneys for Defendants*

Darin Scheer	<input type="checkbox"/>	U.S. Mail, Postage Prepaid
Timothy M. Stubson	<input type="checkbox"/>	Express Mail
Crowley Fleck PLLP	<input type="checkbox"/>	Hand Delivery
111 West 2 <sup>nd</sup> Street, Suite 220	<input type="checkbox"/>	Fax Transmission
Casper, Wyoming 82601	<input type="checkbox"/>	Federal Express
<a href="mailto:dscheer@crowleyfleck.com">dscheer@crowleyfleck.com</a>	<input checked="" type="checkbox"/>	Electronic Transmission
<a href="mailto:tstubson@crowleyfleck.com">tstubson@crowleyfleck.com</a>		

*Attorney for Defendants*

/s/ Kaylee A. Harmon \_\_\_\_\_  
Long Reimer Winegar LLP