



2. I reside in Peckville, Pennsylvania. I currently work as an attorney at the Clark Law Firm, PC. For over a decade, my practice has been focused on landowner and royalty owner oil and gas representation in Pennsylvania.

3. I am submitting this Declaration as I personally met with and communicated with Cheryl B. Canfield (“Ms. Canfield”) from prior to commencement of this Action until her death on July 7, 2019.

4. I submit this Declaration in support of final approval of the \$7,000,000.00 Settlement (“Settlement Amount”), the Plan of Allocation, and the award of expenses incurred by Plaintiffs’ counsel in litigating this case and an award of attorneys’ fees of 25% of the Settlement Amount. I also submit this Declaration in support of the request by Angelo R. Rescigno, Sr., as Executor of the Estate of Cheryl B. Canfield, for a \$5,000 Service Award for the time Ms. Canfield spent monitoring and participating in this litigation.

5. Prior to Ms. Canfield’s death, I communicated with Ms. Canfield regarding all substantial developments in this litigation.

6. I personally reviewed and discussed the Complaint and other significant filings in this matter with Ms. Canfield and the strengths and weaknesses of this Action.

7. I personally reviewed the final settlement terms with Ms. Canfield and answered any questions or concerns she had regarding the Settlement and case in its entirety.

8. I participated in numerous telephone calls and meetings with Ms. Canfield regarding this litigation, particularly about the Complaint and settlement discussions and other important developments.

9. Ms. Canfield expressly authorized Plaintiffs' counsel to settle this action for \$7,000,000.00 and expressly supported the terms of the overall Settlement. *See* ECF 105. Before doing so, Ms. Canfield reviewed, considered, and discussed the merits of the case with me, was kept apprised of the scheduling and progress of the case, and understood the risks and benefits of the decision to settle this litigation. Based on my conversations with Ms. Canfield, Ms. Canfield believed the Settlement provides a fair, reasonable, and adequate recovery on behalf of the proposed Class, and that its approval is in the best interest of the Class Members.

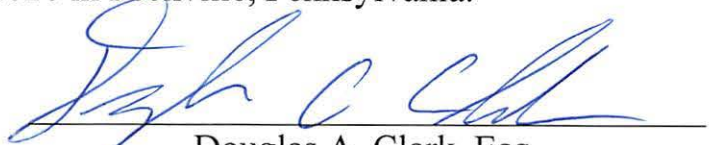
10. While Ms. Canfield was advised that the Court will determine the appropriate fee, she had approved the request for expenses and an attorneys' fee award up to 30% of the Settlement Amount but was advised that plaintiff's counsel would only be seeking a fee award of 25% for which she approved.

11. Additionally, Ms. Canfield was advised and understood that in cases like this, the Court can award a reasonable amount to a representative serving on behalf of

the Class. Given Ms. Canfield's time and effort spent as lead Plaintiff, including time and efforts of Ms. Canfield that I personally observed, I submit Ms. Canfield's effort expended in this case warrants a \$5,000 Service Award.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 25 day of September 2020 in Peckville, Pennsylvania.

  
Douglas A. Clark, Esq.

### **CERTIFICATE OF SERVICE**

The undersigned counsel does hereby certify that he has this day caused to be served a true and correct copy of the above and foregoing via electronic mail on all counsel of record registered to receive filings via ECF.

*/s/ Francis P. Karam*  
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FRANCIS P. KARAM  
Pennsylvania Bar # 77910