

**IN THE DISTRICT COURT OF TEXAS COUNTY
STATE OF OKLAHOMA**

MARVIN TAYLOR,
MARGARET SHEPPARD AND
ALESEN SHEPPARD
FOR THEMSELVES AND ALL OTHERS
SIMILARLY SITUATED,

PLAINTIFFS,

VS.

CHEVRON TEXACO CORPORATION,
TEXACO, INC.;
TEXACO EXPLORATION AND PRODUCTION, INC.;
CHEVRON U.S.A., INC.,
FOR ITSELF AND AS GUARANTOR OF TEXACO
EXPLORATION AND PRODUCTION, INC.; AND
FOUR STAR OIL & GAS COMPANY

DEFENDANTS.

CASE NO. CJ-2002-104

TEXAS COUNTY
FILED

SEP 30 2009

KAREN PARISH
COURT CLERK

By _____ Deputy

**JOINT MOTION FOR:
PRELIMINARY APPROVAL OF SETTLEMENT AGREEMENT,
PRELIMINARY CERTIFICATION FOR SETTLEMENT PURPOSES, AND
APPROVAL OF PLAN OF NOTICE**

The named Class Representatives, Class Counsel, Chevron and Chevron's Counsel (as those terms are defined in the Settlement Agreement) request that the Court:

1. preliminarily certify this action as a class action for settlement purposes only pursuant to 12 O.S. § 2023 (A) and (B)(3);
2. grant preliminary approval of the terms of the Settlement Agreement;
3. approve the Plan of Notice to the Class (as defined in Settlement Agreement); and
4. schedule a hearing to consider final approval of the Settlement Agreement.

Wherefore, Movants respectfully request the Court's: 1) preliminary certification of Class Claims for settlement purposes only; 2) preliminary approval of the Settlement Agreement; 3) approval of the Plan of Notice to the Class; and 4) scheduling of a hearing date for final approval of the Settlement Agreement.

Respectfully submitted,

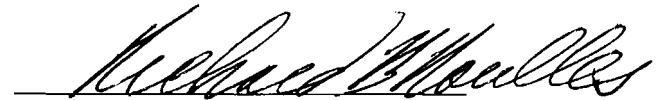


Terry J. Barker, OBA No. 12553
Joseph C. Woltz, OBA No. 14341
Gene G. Boerner, OBA No. 17577
Pezold Barker & Woltz
401 South Boston, Suite 3400
Tulsa, OK 74103-4017

Douglas E. Burns, OBA No. 1342
Terry L. Stowers, OBA No. 17453
Burns & Stowers, P.C.
1300 West Lindsey
Norman, Oklahoma 73069

Robert J. Kee, OBA No. 4903
Trippet, Kee, Trippet & Parsons
P.O. Box 728
Beaver, OK 73932

Attorneys for Plaintiffs



Richard B. Noulles, OBA No. 6719
Gable & Gotwals
1100 Oneok Plaza
100 West Fifth Street
Tulsa, OK 74103

Charles C. Correll
King & Spaulding LLP
Four Embarcadero Center
Suite 3500
San Francisco, CA 94111

David T. Chang
Chevron U.S.A. Inc.

Attorneys for Chevron

CERTIFICATE OF SERVICE

No Service Required, All Parties Are Movants.