

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

IN RE SEMGROUP ENERGY PARTNERS, L.P.,
SECURITIES LITIGATION

CASE NO. 08-MD-1989-GKF-FHM

**LEAD PLAINTIFF'S MOTION TO
DEPOSIT CURRENT AND FUTURE PROCEEDS FROM THE SEMGROUP CLASS'S
CLAIM IN THE LEHMAN SIPA PROCEEDING INTO THE SETTLEMENT FUND
AND FOR ATTORNEYS' FEES AND EXPENSES RELATED THERETO**

Pursuant to Rule 7.2 of the Local Civil Rules for the United States District Court for the Northern District of Oklahoma, Lead Plaintiff Harvest Fund Advisors LLC hereby respectfully moves this Court for the entry of an order (i) authorizing Lead Counsel to deposit the proceeds that have been paid to or for the benefit of the SemGroup Class on the Lehman Claim into the Settlement Fund for the above-captioned litigation; (ii) authorizing Lead Counsel to deposit any and all future proceeds paid to or for the benefit of the SemGroup Class from the Lehman Claim into the Settlement Fund; (iii) approving 19% of the proceeds that have been received on the Lehman Claim to date (i.e., \$50,787.00) as attorneys' fees to Lead Counsel; (iv) approving 19% of any future proceeds received on the Lehman Claim as attorneys' fees to Lead Counsel; (v) approving reimbursement of expenses in the amount of \$41,909.07 to Lead Counsel; and (vi) approving reimbursement of any additional expenses to be incurred by Lead Counsel following this submission in an amount up to \$2,500.00.

This Motion is based upon the accompanying: (i) Memorandum in Support of Lead Plaintiff's Motion to Deposit Current and Future Proceeds from the SemGroup Class's Claim in the Lehman SIPA Proceeding into the Settlement Fund and for Attorneys' Fees and Expenses

Related Thereto and (ii) Declaration of Stuart L. Berman; and all other pleadings and matters of record.

A [Proposed] Order Authorizing the Deposit of Current and Future Proceeds from the SemGroup Class's Claim in the Lehman SIPA Proceeding into the Settlement Fund and for Attorneys' Fees and Expenses Related Thereto is being submitted herewith for the Court's consideration.

In February 2015, Lead Counsel filed a motion with the Court seeking substantially similar relief (the "February Motion"). In advance of filing the February Motion, Lead Counsel conferred with counsel for the Settling Defendants. Seven of the eight defense firms involved in the litigation indicated that they did not oppose the relief being sought in the February Motion, and the only other defense firm in the litigation indicated that none of its clients were taking a position on the February Motion at that time.

Dated: July 31, 2015

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CERTIFICATE OF SERVICE

I certify that on the 31st day of July 2015, I electronically transmitted the foregoing to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF Registrants:

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