

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

In re SANDRIDGE ENERGY, INC.)	No. 5:12-cv-01341-G
SECURITIES LITIGATION)	
_____)	<u>CLASS ACTION</u>
)	
This Document Relates To:)	
)	
ALL ACTIONS.)	
_____)	

**DECLARATION OF ANGELICA GALKIN IN SUPPORT OF
PLAINTIFFS' MOTION FOR FINAL APPROVAL OF SETTLEMENT**

I, Angelica Galkin, declare as follows:

1. I was named as a lead Plaintiff in the above-captioned case (the “Litigation”) on March 6, 2013, along with my husband Vladimir Galkin, Laborers Pension Trust Fund of Northern Nevada (“Northern Nevada”) and Construction Laborers Pension Trust of Greater St. Louis (“Greater St. Louis”) (collectively, “Plaintiffs”). ECF No. 60. My husband and I remained as active participants in the Litigation for over 6 years until I was certified as a class representative along with Northern Nevada and Greater St. Louis by Order dated September 30, 2019 (“Class Representatives”). ECF No. 453. I thereafter continued my active participation in this Litigation following my appointment as Class Representative.

2. I respectfully submit this declaration in support of Plaintiffs’ motion for final approval of the \$21,807,500 settlement (the “Settlement”) and Robbins Geller Rudman & Dowd LLP’s (“Robbins Geller” or “Class Counsel”) Application for Award of Attorneys’ Fees and Expenses. I have personal knowledge of the statements made herein, and, if called as a witness, could and would testify competently thereto.

3. In my capacity as a Plaintiff and as a Class Representative, I understood my duty to serve the interests of the Class by supervising the management and prosecution of the Litigation under the guidance of Robbins Geller. Class Counsel and Class Representatives vigorously prosecuted this case on behalf of the Class for approximately ten years. Ultimately, Plaintiffs and Class Counsel agreed to settle the case only after achieving Class certification, completing exhaustive fact and expert discovery, fully briefing dispositive motions, including summary judgment and *Daubert* briefing, mediations, and balancing the

risks of trial and appeal (if Plaintiffs prevailed), against the immediate benefit of an \$21,807,500 recovery.

4. Following my appointment as lead Plaintiff, and over the course of the Litigation, I was kept fully informed of case developments and procedural matters. I had frequent and regular contact with Class Counsel to review legal documents, discuss the progress of the case and oversee Robbins Geller. Specifically, I: (i) engaged in numerous phone conferences and correspondence with Robbins Geller; (ii) reviewed drafts and final versions of court filings; (iii) reviewed detailed correspondence concerning the status of the Litigation; (iv) consulted with Robbins Geller regarding litigation and settlement strategy; (v) reviewed and produced hundreds of pages' worth of documents; (vi) prepared for and sat for a deposition in Miami, Florida in connection with Plaintiffs' successful motion for class certification; (vii) responded to interrogatories; and (viii) was kept informed about all aspects of the multiple mediations and subsequent settlement negotiations throughout this litigation.

5. I have evaluated the significant risks and uncertainties of continuing litigation, including the possibility of a nominal recovery or even no recovery at all, and have authorized counsel to settle this Litigation for \$21,807,500. I am aware of the possibility of losing at summary judgment or trial and that, even if Plaintiffs were to prevail at each of these steps, defendants would likely appeal, further delaying any recovery to the Class. I believe this Settlement is fair and reasonable, represents a very good recovery, and is in the best interests of the Class.

6. While I recognize that the determination of attorneys' fees and expenses is made by the Court, I believe that Class Counsel's request for an award of attorneys' fees of

one-third of the Settlement Amount and its litigation expenses in an amount not to exceed \$2,700,000 plus interest on both amounts, is fair and reasonable, as this Settlement would not have been possible without Class Counsel's diligent and aggressive prosecutorial efforts.

7. I have expended approximately 19.2 hours on the prosecution of this Litigation, which would otherwise have been focused on other professional activities. Based upon my qualifications, I believe that an award of \$3,360.00 reflecting an hourly rate of \$175, is reasonable and appropriate for the time I spent representing the Class.

8. In light of the foregoing, I respectfully request that the Court grant final approval of the Settlement and the plan of allocation, approve Robbins Geller's motion for an award of attorneys' fees and expenses, and grant an award of \$3,360.00 representing the time that I spent on this action.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration was executed this 25 day of August 2022, in Florida Miami,



ANGELICA GALKIN

CERTIFICATE OF SERVICE

I hereby certify that on September 1, 2022, I electronically transmitted the attached Declaration of Angelica Galkin in Support of Plaintiffs' Motion for Final Approval of Settlement using the ECF system for filing, which will send notification of such filing to all counsel registered through the ECF System.

s/ Evan J. Kaufman

EVAN J. KAUFMAN