

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

I, Vladimir Galkin, declare as follows:

1. I was named as a lead Plaintiff (“Lead Plaintiff”) in the above-captioned case (the “Litigation”) on March 6, 2013, along with my wife Angelica Galkin (“Angelica”), 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. I remained an active participant in the Litigation for over 6 years, until the Court’s September 30, 2019 Order on Plaintiffs’ motion for class certification. ECF No. 453. Specifically, the Court held that I could not serve as a class representative because, even though we are husband and wife, the SandRidge stock relevant to this litigation was purchased through an individual brokerage account owned and held by Angelica. *See id.* at 5. The Court subsequently appointed Angelica as a Class Representative, along with Northern Nevada and Greater St. Louis ( the “Class Representatives”). *See id.* at 21.

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 lead Plaintiff, 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 until the Court’s September 30, 2019 Order. 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 my involvement in 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) travelled to New York City to prepare for and sit for a deposition 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 am aware of the significant risks and uncertainties of continuing litigation, including the possibility of a nominal recovery or even no recovery at all. I am also 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 understand that Class Representatives have authorized counsel to settle this Litigation for \$21,807,500, and 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 29.5 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 \$5,162.50 reflecting an hourly rate of \$175, is reasonable and appropriate for the time I spent representing the Class as a lead Plaintiff.

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 \$5,162.50 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 23 day of August

2022, in

*August Florida Miami*

  
VLADIMIR GALKIN

CERTIFICATE OF SERVICE

I hereby certify that on September 1, 2022, I electronically transmitted the attached Declaration of Vladimir 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