IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

NORTHUMBERLAND COUNTY RETIREMENT SYSTEM and OKLAHOMA LAW ENFORCEMENT RETIREMENT SYSTEM, Individually and On Behalf of All Others Similarly Situated,	)	
Plaintiffs,	)	Case No. CIV-11-520-D
v.	)	
GMX RESOURCES INC., et al.,	)	
Defendants.	)	

SUPPLEMENTAL SUBMISSION IN FURTHER SUPPORT OF CLASS REPRESENTATIVES' UNOPPOSED MOTIONS FOR FINAL APPROVAL OF SETTLEMENT AND APPROVAL OF ATTORNEYS' FEES AND LITIGATION EXPENSES

Pursuant to the Court's Order dated April 21, 2014 and as a supplement to the initial filing made by Plaintiffs Northumberland County Retirement System and Oklahoma Law Enforcement Retirement System (collectively, "Class Representatives") and their counsel on June 26, 2014, Class Representatives respectfully submit the following information to the Court regarding the notice mailing and the status of any objections or requests for exclusion received.

As set forth in the Supplemental Declaration of Josephine Bravata submitted on behalf of Strategic Claims Services ("SCS") and attached hereto as Exhibit 1, a total of 16,215 copies of the Notice of Pendency and Proposed Settlement of Class Action,

Motion for Attorneys' Fees and Expenses and Final Approval Hearing have been disseminated to potential Settlement Class Members and nominees. As the July 10, 2014 deadline for submitting objections and requests for exclusion has now passed, Class Representatives, along with their counsel, are pleased to inform the Court that not a single objection to the Settlement, Plan of Allocation or the request for attorneys' fees and expenses to Class Counsel has been filed. In addition, SCS has received no requests for exclusion from the Settlement Class.

For the reasons set forth herein and in the initial filing with the Court on June 26, 2014, and following an extensive notice program in response to which no objections were filed, Class Representatives respectfully submit that the Settlement is an outstanding result for the Settlement Class and the proposed Plan of Allocation is a fair and equitable method for distributing the Net Settlement Fund. Therefore, both the Settlement and Plan of Allocation should be approved as fair, reasonable and adequate. Finally, Class Counsel's request for attorneys' fees and reimbursement of expenses is fair and reasonable and should be awarded in the amounts sought.[1] Accordingly, Class Representatives respectfully request that the Court enter the proposed orders that are being concurrently submitted for the Court's consideration.

Dated: July 15, 2014

Respectfully submitted,
/s/ *Derrick L. Morton*
Derrick L. Morton, OBA No. 17934
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[1] Attached hereto as Exhibit 2 are Class Counsel's updated expense charts reflecting additional expenses incurred since the initial filing on June 26, 2014.

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**CLASS COUNSEL AND
ATTORNEYS FOR PLAINTIFFS**

CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2014, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the following ECF registrants:

Dated: July 15, 2014 /s/ *Derrick L. Morton*

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA

NORTHUMBERLAND COUNTY RETIREMENT SYSTEM and OKLAHOMA LAW ENFORCEMENT RETIREMENT SYSTEM, Individually and On Behalf of All Others Similarly Situated, Plaintiffs, v. GMX RESOURCES INC., et al., Defendants.	Case No. CIV-11-520-D

SUPPLEMENTAL DECLARATION OF JOSEPHINE BRAVATA CONCERNING (A) MAILING OF THE NOTICE AND CLAIM FORM; AND (B) REQUESTS FOR EXCLUSION RECEIVED

EXHIBIT
1

I, Josephine Bravata, declare:

1. I am the Quality Assurance Manager of Strategic Claims Services ("SCS"), a nationally recognized class action administration firm. I have over twelve years of experience specializing in administration of class action cases. SCS was established in April 1999 and has administered over three-hundred (300) class action cases since its inception. Pursuant to the Court's Order dated April 21, 2014, the Court approved the retention of SCS to act as the claims administrator for the settlement reached in the above-captioned litigation (the "Litigation"). I am over 21 years of age and am not a party to this Litigation. I have personal knowledge of the facts set forth herein.

2. I respectfully submit this declaration as a supplement to the Declaration of Josephine Bravata Concerning (A) Mailing of CAFA Notice; (B) Mailing of the Notice and Claim Form; (C) Publication of the Summary Notice; and (D) Requests for Exclusion Received to Date dated June 25, 2014 (the "Initial Bravata Declaration") previously filed with the Court and in order to provide the Court and the parties to the Litigation with additional information regarding, *inter alia*: (i) the mailing of the Notice of Pendency and Proposed Settlement of Class Action, Motion for Attorneys' Fees and Expenses and Final Approval Hearing ("Notice") and the Proof of Claim and Release Form ("Claim Form" and, together with the Notice, the "Notice Claim Form") and (ii) the requests for exclusion from the Settlement Class.

MAILING OF NOTICE AND CLAIM FORM

3. Pursuant to the notice program described in the Initial Bravata Declaration, SCS mailed or e-mailed the Notice along with a letter to the 1,713 Nominee Account Holders and Institutional Groups contained on SCS's master mailing list. In addition, SCS mailed 15,182 Notice Claim Forms to potential Settlement Class Members and nominees.

4. Since the execution of the Initial Bravata Declaration, SCS continued to receive requests from potential Settlement Class Members and nominees for copies of the Notice Claim Form. As a result of such requests, additional Notice Claim Forms have been mailed such that as of July 10, 2014, SCS has mailed a total of 16,215 Notice Claim Forms to potential Settlement Class Members and nominees.

WEBSITE

5. On June 27, 2014, SCS updated its website, www.strategicclaims.net, to include the following documents: (i) Class Representatives' Unopposed Motion for Final Approval of Settlement and Memorandum of Law in support thereof; (ii) Class Representatives' Unopposed Motion for Approval of Attorneys' Fees and Litigation Expenses and Memorandum of Law in support thereof; and (iii) Declaration of Bradley E. Beckworth and Michael K. Yarnoff on Behalf of Class Counsel, and the exhibits attached thereto. In addition, the Declaration of Layn R. Phillips in support of the Settlement was also posted and made available for review on SCS's website.

REQUESTS FOR EXCLUSION

6. Paragraph 38 of the Notice informed potential Settlement Class Members

that written requests for exclusion must be received no later than July 10, 2014, addressed to: *Northumberland County Retirement System, et al. v. GMX Resources Inc., et al.*, c/o Strategic Claims Services, P.O. Box 230, 600 N. Jackson Street, Suite 3, Media, PA 19063. The Notice also set forth the information that must be included in each request for exclusion. To date, SCS has received no requests for exclusion.

Signed this 15th day of July 2014, in Media, Pennsylvania.

Josephine Bravata

NIX, PATTERSON & ROACH, LLP Expense Report	
Expense Description	**Total Category Expense**
Administrative Expenses (FedEx & AT Conference Calls)	$144.65
Internal Reproduction Costs	$125.00
Litigation Fund Contribution	$17,500.00
Research (Lexis Nexis)	$9,416.93
Meals, Hotels & Transportation	$10,262.88
TOTAL:	**$37,449.46**

KESSLER TOPAZ MELTZER & CHECK, LLP Expense Report	
Expense Description	**Total Category Expense**
Filing Fees	$1,665.00
Litigation Fund Contributions	$38,500.00
Messenger, Courier & Overnight Mail	$193.21
Postage	$2.90
Meals, Hotels & Transportation	$2,127.18
Research	$3,599.08
Press Releases & Notices	$200.00
Teleconferences	$5.03
Expert	$707.50
Internal Reproduction Costs	$982.80
Mediation	$1,250.00
Less Balance Remaining in the Litigation Fund	($86.35)
TOTAL:	**$49,146.35**

LEAD COUNSEL EXPENSES	$86,595.81
LIAISON COUNSEL EXPENSES	$846.82
TOTAL EXPENSES	**$87,442.63**

