



**SECOND SUPPLEMENTAL RESPONSE AT REQUEST OF COURT TO  
RECEIVER’S FEE APPLICATION FOR SERVICES PERFORMED BETWEEN  
OCTOBER 1, 2024 AND DECEMBER 31, 2024, AND BRIEF IN SUPPORT  
[ECF NO. 676]**

Deborah D. Williamson, in her capacity as the Court-appointed Receiver (the “Receiver”) for the Receivership Parties (as defined in the *Order Appointing Receiver* [ECF No. 17] (the “Receivership Order”))<sup>1</sup> and receivership estates (collectively, the “Receivership Estates”) in the above-captioned case (the “Case”), hereby files this *Supplemental Response at Request of Court to Receiver’s Fee Application for Services Performed Between October 1, 2024 and December 31, 2024, and Brief in Support [ECF No. 676]* (the “Supplemental Response”) in accordance with the Court’s directive on March 4, 2025.

1. On February 4, 2025, the Receiver filed the *Receiver’s Fee Application for Services Performed Between October 1, 2024 and December 31, 2024, and Brief in Support* [ECF No. 676] (the “Application”), which requested, in part, Court approval, on an interim basis, and authorization of payment of fees incurred by Jones in the amount of \$1,430.00 for services performed during the Application Period as oil and gas transactional counsel to the Receiver.

**I. RESPONSE**

2. At the direction of the Court on March 4, 2025, the Receiver has reviewed Jones’ invoices during the Application Period.

3. The Receiver has verified that Jones has expended an aggregate of 8.30 hours on this Case during the Application Period. At Jones’ discounted standard hourly rate of \$325.00 per hour for all counsel, Jones’ fees for the Application Period total \$1,430.00.

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meaning ascribed in the Receivership Order or the Application, as applicable.

4. The Receiver has attached Jones's October, November,<sup>2</sup> and December invoices to this Supplemental Response as **Exhibit A**.

## II. **CONCLUSION**

5. The Receiver respectfully requests the Court enter an Order approving the Application, in part, as modified below with respect to Jones:

- (a) Fees incurred by Jones as oil and gas transactional counsel to the Receiver during the Application Period, totaling **\$1,430.00**.

Dated: March 4, 2025

Respectfully submitted,

By: /s/ Dominique A. Douglas

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**COUNSEL TO RECEIVER**

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<sup>2</sup> The November invoice was inadvertently omitted as an exhibit to the Application.

**CERTIFICATE OF SERVICE**

I hereby certify that on March 4, 2025, the foregoing document was served via CM/ECF on all parties appearing in this case, including Securities and Exchange Commission, and via email on the following unrepresented parties on this Court's docket:

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/s/ Dominique A. Douglas  
Dominique A. Douglas

**EXHIBIT A**

Law Practice of Darrell R. Jones, PLLC

drj@oilesquire.com

(832) 302-5373

December 02, 2024

**Deborah Williamson**  
Dykema Gossett PLLC  
112 E. Pecan St.  
Ste 1800  
San Antonio, TX 78205

**Invoice Number: 1041**

Invoice Period: 11-01-2024 - 11-30-2024

Payment Terms: Upon Receipt

Make check payable to the Law Practice of Darrell R. Jones, PLLC

**RE: Receiver for Barron Petroleum LLC, Barron Energy Corporation and Affiliated Entities****Time Details**

Date	Professional	Task	Hours	Rate	Amount
11-01-2024	Eric Hillerman	C300 - Analysis and Advice Work regarding well operations	0.50	325.00	162.50
11-06-2024	Darrell Jones	B130 - Asset Disposition Review SDMB Farmout Agreement and JOA to form guidance to client on Carry and future cost exposure topics; meeting with client to discuss same.	2.30	325.00	747.50

**Total** 910.00**Time Summary**

Professional	Hours	Amount
Darrell Jones	2.30	747.50
Eric Hillerman	0.50	162.50
<b>Total</b>		910.00

**Total for this Invoice** 910.00