

No. 13-0199

In the Supreme Court of Texas

**STEADFAST FINANCIAL, L.L.C., R.J. SIKES, ROGER SIKES, KATHY SIKES,
GREG LOUVIER, PAM LOUVIER, CHRISTY ROME, R. CRIST VIAL, DACOTA
INVESTMENT HOLDINGS, L.L.P. A/K/A DACOTA INVESTMENT HOLDINGS, L.P.,
RANGE RESOURCES CORPORATION, AND RANGE PRODUCTION I, L.P.,**

Petitioners,

v.

BETTY LOU BRADSHAW,

Respondent.

*On Appeal from the Second Court of Appeals at Fort Worth
Court of Appeals No. 02-10-00369-CV*

**JOINT MOTION FOR ADDITIONAL TIME
FOR EACH SIDE TO PRESENT ORAL ARGUMENT**

Petitioners Range Resources Corporation and Range Production I, L.P.,
Petitioners Steadfast Financial, L.L.C. and Petitioners R.J. Sikes, Roger Sikes, Kathy
Sikes, Greg Louvier, Pam Louvier, Christy Rome, Dacota Investment Holdings, L.L.P.
and R. Crist Vial, together with Respondent Betty Lou Bradshaw, file this joint motion
requesting additional time for each side to present oral argument and in support
thereof would show as follows:

On June 27, 2014 the Court granted the three petitions for review filed in this case by Steadfast Financial L.L.C. (“Steadfast”); seven individual royalty owners (“Royalty Owners”); and Range Resources Corporation and Range Production, L.L.C. (“Range Entities”). The Court set the case for oral argument on October 15, 2014 at 9 a.m. allotting 20 minutes “per side” to present argument. The parties respectfully request the Court to allot 20 minutes to Petitioners Steadfast and the Royalty Owners; 20 minutes to Petitioners Range Resources and Range Production; and 40 minutes to Respondent Bradshaw.

First, this case actually involves at least three “sides,” not two. Petitioners Steadfast/the Royalty Owners and Petitioners Range Resources/Range Production require equal argument time to present their respective sides. Steadfast filed a petition presenting two issues and the Royalty Owners filed a petition presenting two different issues. Separate counsel for the Range Entities filed a petition presenting three issues, two of which contain four sub-issues applicable only to the Range entities’ derivative liability. Bradshaw responded to all issues raised by all Petitioners.

Second, each of the two counsel for Petitioners’ “sides” needs 20 minutes of argument time in order to begin to cover the numerous distinct issues in this case and respond to the court’s questions regarding the multiple discrete theories of primary and derivative liability and equitable relief at issue. Each of these issues,

standing alone, requires close scrutiny and careful deliberation. Counsel for Respondent needs equal time to adequately respond and answer questions.

In such special circumstances, this Court has in the past granted substantial additional time to the parties to present argument, and justice requires a similar extension of time here.

For these reasons, the parties respectfully request that, pursuant to Texas Rule of Appellate Procedure 59.4, the Court issue an order allowing oral argument as follows:

Petitioners Steadfast and Royalty Owners	15 minutes opening
Petitioners Range Entities	15 minutes opening
Respondent Betty Lou Bradshaw	40 minutes
Petitioners Steadfast and Royalty Owners	5 minutes rebuttal
Petitioners Range Entities	5 minutes rebuttal

Respectfully submitted,

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CERTIFICATE OF CONFERENCE

I certify that on September 16 and September 17, 2014 I contacted Daniel Bates and Melissa Lorber by telephone and by email, who informed me that they agree that this motion should be granted.

/s/ Charles R. "Skip" Watson, Jr.
Charles R. "Skip" Watson, Jr.

CERTIFICATE OF SERVICE

I hereby certify that on September 18, 2014, a true and correct copy of the foregoing was e-served via Efile.TxCourts.gov upon the following:

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