

CAUSE NO. DC-12-06318

DAVID NEIGER, derivatively on behalf of SUN RIVER ENERGY, INC., <i>Plaintiffs,</i> v. SUN RIVER ENERGY, INC., <i>Nominal Defendant,</i> v. DONAL R. SCHMIDT, JR., <i>Defendants.</i>	§ § § § § § § § § § § § §	IN THE DISTRICT COURT OF DALLAS COUNTY, TEXAS 134th JUDICIAL DISTRICT
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TO: ALL PERSONS AND ENTITIES WHO HELD THE COMMON STOCK OF SUN RIVER ENERGY, INC. (“SUN RIVER” OR THE “COMPANY”) AS OF AUGUST 2010-PRESENT (“CURRENT SUN RIVER SHAREHOLDERS”)

PLEASE READ THIS NOTICE CAREFULLY. YOUR RIGHTS WILL BE AFFECTED BY A DERIVATIVE ACTION LAWSUIT PENDING IN THIS COURT.

YOU ARE HEREBY NOTIFIED by the 134th District Court of Dallas County Texas (the “Court”): (i) of the pendency of this derivative action on behalf of Sun River; and (ii) that a Settlement with Sun River, Donal R. Schmidt, Jr. (“Schmidt”), Timothy Wafford (“Wafford”), James Pennington (“Pennington”), Judson F. Hoover (“Hoover”), Robert B. Fields (“Fields”), Stephen W. Weathers (“Weathers”), Mark Hall (“Hall”), Daniel M. Cofall (“Cofall”)(collectively “Individual Defendants”), Kevin Casey and Maxwell Resources, Inc., has occurred. The proposed settlement will implement corporate governance changes designed to protect the company and financial reform/modification of outstanding notes. The terms of the settlement are filed with the Court.

A hearing will be held before the 134th District Court, at 600 Commerce Street, Dallas, TX 75202 at 9:00 a.m., on, December 12, 2014 to determine whether the proposed Settlement should be approved by the Court as fair, reasonable, and adequate; (ii) to determine whether the Released Claims against Sun River and the Individual Defendants should be dismissed with prejudice; and (iii) reasonable and necessary attorneys' fees and expenses to Derivative Plaintiffs Counsel ("Settlement Hearing").

IF YOU ARE A CURRENT SUN RIVER SHAREHOLDER, YOUR RIGHTS WILL BE AFFECTED BY THE PENDING ACTION AND THE SETTLEMENT.

This notice contains only a summary of the terms of the Settlement. For a more detailed statement of the matters involved in the derivative action, reference is made to the Stipulation, which may be inspected at the Office of the Clerk, 600 Commerce Street, Dallas, TX 75202, during business hours of each business day.

Any objections to the proposed Settlement, must be filed with the Court and delivered to Plaintiffs' Counsel and Defendants' Counsel no later than ten (10) days prior to the Settlement Hearing, at the following addresses:

William B. Federman
FEDERMAN & SHERWOOD
10205 N. Pennsylvania Ave.
Oklahoma City, OK 73120

Counsel for Derivative Plaintiffs

David R. Clouston
SESSIONS FISHMAN
NATHAN & ISRAEL, LLC
Founders Square
900 Jackson Street, Suite 440
Dallas, TX 75202

Lars L. Berg
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HALLMAN, LLP
201 Main St., Suite 2500
Fort Worth, TX 76102

Richard Roper, III
THOMPSON & KNIGHT,
LLP
One Arts Plaza
1722 Routh St., Suite 1500
Dallas, TX 75201


PLEASE DO NOT CONTACT THE COURT OR SUN RIVER REGARDING THIS NOTICE.

Objections to the settlement must contain proof of continuous ownership throughout the relevant period, from August 2010 to the present. Objections must also state why the proposed settlement is not in the best interests of the Company and how the objector meets the criteria of an adequate shareholder representative under Colorado law by affidavit.

Inquiries may be made to Plaintiffs' Counsel:

William B. Federman
FEDERMAN & SHERWOOD
10205 N. Pennsylvania Ave.
Oklahoma City, OK 73120

DATED: October 10, 2014


THE HONORABLE DALE TILLERY
134TH DISTRICT COURT
DALLAS COUNTY, TEXAS

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