The Honorable Patricia C. Williams
Chapter 11

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WASHINGTON
AT SPOKANE

In re: THE CATHOLIC BISHOP OF SPOKANE, a/k/a The Catholic Diocese of Spokane, Debtor.	Case No. 04-08822 **MOTION FOR ORDER AUTHORIZING COVERAGE OF TAX COUNSEL TO PLAN TRUSTEE AS AN AUTHORIZED PERSON UNDER THE PROTOCOL FOR SHARING CONFIDENTIAL PROOFS OF CLAIM FOR SEXUAL ABUSE**

THIS MOTION is made by the Plan Trustee. The Plan Trustee states as follows:

1. The Plan Trustee has applied to the Court for an Order authorizing the employment of John M. Colvin as tax counsel to the Plan Trustee.

2. Mr. Colvin's professional services as tax counsel to the Plan Trustee are necessary to advise the Plan Trustee as to the tax implications of administration of the Plan Trust, as well as review and possible filing of tax returns for the Plan Trust.

3. Mr. Colvin has already reviewed the non-confidential creditors' matrix, but must have access to the names of all confidential sex abuse claimants so that he may perform a conflict check as required by the Rules of Professional Conduct.

4. There is a Protocol for Sharing Confidential Proofs of Claim for Sexual Abuse (the "Protocol") established by the Order (1) Fixing Bar Date for Filing Proofs of Claim; (2) Approving Proof of Claim and Bar Date Notice Forms; and (3) Approving Notice Procedures (the "Bar Date Order"). ECF Docket No. 883.

5. The Protocol, which was drafted and approved in November 2005, did not

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contemplate, and presently does not cover the tax counsel to the Plan Trustee as an "Authorized Person".

6. The Plan Trustee desires that John Colvin know the identify of the claimants who have filed and review the Confidential Proofs of Claim for Sexual Abuse and, accordingly, she desires that Mr. Colvin and any of his associates, paralegals or clerical employees who are assisting him in his role as tax counsel to the Plan Trustee be covered under the Protocol as an "Authorized Person".

WHEREFORE, the Plan Trustee respectfully moves the Court for an Order to the effect that the Protocol, approved by Section 18 of the Bar Date Order, a copy of which is attached to the Bar Date Order as Exhibit G, shall include John M. Colvin and any of his associates, paralegals or clerical employees who are assisting him in his role as tax counsel to the Plan Trustee be covered under the Protocol as an "Authorized Person".

DATED this 16th day of April, 2007.

Presented by:

NAGLER & ASSOCIATES

/s/Gloria Z. Nagler
GLORIA Z. NAGLER
WSBA# 13176
Plan Trustee

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