

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

**ADDENDUM TO APPLICATION FOR
ORDER AUTHORIZING
EMPLOYMENT OF RICHARD
GINNIS AS ACCOUNTANT TO THE
PLAN TRUSTEE**

This Addendum to Application for Order Authorizing Employment of Richard Ginnis as Accountant to the Plan Trustee (hereafter, "Addendum") is submitted by the Plan Trustee. Filed contemporaneously with this Addendum is the duly executed Verified Statement of Richard Ginnis in Support of Application for Order Authorizing Employment (hereafter, the "Ginnis Statement").

The Plan Trustee represents:

1. The Catholic Bishop of Spokane, a/k/a The Catholic Diocese of Spokane ("Debtor"), filed the instant Chapter 11 proceeding on December 6, 2004.

2. Debtor's Plan of Reorganization ("Plan") was filed on January 4, 2007.

3. Pursuant to the terms of the Plan, upon confirmation, the Plan provides for creation of the Plan Trust. Sections 15 and 16 of the Plan set forth a detailed description of the Plan Trust and the effect of its implementation.

4. The Plan Trust is to be administered by the Plan Trustee, whose duties include,

1 but are not limited to collection from Debtor of payments required under the Plan, review and
2 payment of claims, maintenance of Plan Trust funds, preparation and filing of required federal
3 and state accountings and tax returns, and litigation of claims brought by litigating claimants.

4 5. Pursuant to the terms of the Plan Trust and the Plan of Reorganization, the Plan
5 Trustee is to maintain a detailed separate accounting ledger of payments and interest receipts for
6 each class of claimants paid under the Plan. In addition to maintaining these ledgers and filing
7 required tax returns on behalf of the Plan Trust, the Plan Trustee is charged with the general task
8 of administering the Plan Trust; attendant to administration of the Plan Trust is the need for an
9 accountant with experience in bankruptcy matters to advise, consult and provide professional
10 services for any accounting issues that arise during the course of administration of the Plan
11 Trust.

12 6. Mr. Ginnis is a Certified Public Accountant and a member in the firm of Ginnis &
13 Chalhoub, LLC and has served extensively as an accountant in bankruptcy matters. The Plan
14 Trustee believes Mr. Ginnis's experience qualifies him to serve as Accountant to the Plan
15 Trustee.

16 7. The terms of Mr. Ginnis's employment are set forth in detail in his Verified
17 Statement in Support of Application for Order Authorizing Employment of Risk Management
18 Consultant to the Plan Trustee.

19 9. To the best of the knowledge, information and belief of the Plan Trustee,
20 Mr. Ginnis is a "disinterested party" as that term is described in 11 U.S.C. § 101(14).

21 WHEREFORE, the Plan Trustee respectfully requests that the employment of
22 Richard Ginnis as Accountant to the Plan Trustee be approved by the Court.

23
24 DATED this 22nd day of June, 2007.

25 **NAGLER & ASSOCIATES**
26
27

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