

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
ACCOUNTANT 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 Richard Ginnis as Accountant to the Plan Trustee.
2. Mr. Ginnis's professional services as Accountant to the Plan Trustee are necessary to assist the Plan Trustee in creation and maintenance of individual accountings for the various sub-accounts required to be created from the Plan Trust funds. Mr. Ginnis will also prepare and file all necessary federal and state tax returns for the Plan Trust.
3. 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.
4. The Protocol, which was drafted and approved in November 2005, did not contemplate, and presently does not cover the Accountant to the Plan Trustee as an "Authorized Person".

1 5. The Plan Trustee desires that Richard Ginnis know the identify of the claimants
2 who have filed and review the Confidential Proofs of Claim for Sexual Abuse and, accordingly,
3 she desires that Mr. Colvin and any of his partners, associates, or clerical employees who are
4 assisting him in his role as Accountant to the Plan Trustee be covered under the Protocol as an
5 “Authorized Person”.

6 WHEREFORE, the Plan Trustee respectfully moves the Court for an Order to the effect
7 that the Protocol, approved by Section 18 of the Bar Date Order, a copy of which is attached to
8 the Bar Date Order as Exhibit G, shall include Richard Ginnis and any of his partners, associates,
9 or clerical employees who are assisting him in his role as Accountant to the Plan Trustee be
10 covered under the Protocol as an “Authorized Person”.

11 DATED this 15th day of August, 2007.

12 Presented by:

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14 **NAGLER & ASSOCIATES**

15 /s/Gloria Z. Nagler
16 GLORIA Z. NAGLER
17 WSBA# 13176
18 Plan Trustee
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