

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

**NOTICE OF 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**

TO: **All Parties Entitled to Notice Pursuant to the Standing Order Limited Notice**
AND TO: **All Special Notice Recipients**
AND TO: **The Clerk of the Court**
AND TO: **The Office of the United States Trustee**

PLEASE TAKE NOTICE that the Plan Trustee has moved (the "Motion") the Court for an Order authorizing coverage as an "Authorized Person" under the Protocol for Sharing Confidential Proofs of Claim for Sexual Abuse, of Accountant to the Plan Trustee, Richard Ginnis.

The 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), identifies the "Authorized Persons" who are permitted to know the identity and the review the proofs of claim of claimants who filed Confidential Proofs of Claim for Sexual Abuse. The Protocol, which was drafted and approved in November, 2005, did not contemplate and does not presently cover the Accountant to the Plan Trustee as an "Authorized Person". The Motion requests that Richard Ginnis and any of his partners, associates, or clerical employees who are assisting him in his role as Accountant to the Plan Trustee be covered under the Protocol as an "Authorized Person".

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1 A complete copy of the Motion and supporting documentation are available: (a) at the
2 Clerk's Office of the United States Bankruptcy Court, located at 904 W. Riverside, Ste. 304,
3 Spokane, WA 99201-1011; (b) online at <http://ecf.wawb.uscourts.gov/cgi-bin/login.pl> (a fee-
4 based registration is required to access the information on this website); (c) online at
5 <http://dioceseofspokane.org/chapter11/chapter11index.htm>, or (d) a copy may be obtained by
6 submitting a written request to David Diack of Nagler & Associates at david@naglerlaw.com or
7 (206) 224-3463 (facsimile).

8 YOU ARE FURTHER NOTIFIED that any objections to the above must be in writing,
9 must be filed with the Clerk of the United States Bankruptcy Court at 904 W. Riverside, Ste.
10 304, Spokane, WA 99201-1011 (mailing address: PO Box 2164, Spokane, WA 99210-2164),
11 and must be served upon the undersigned counsel not later than 23 calendar days from the date
12 of this notice.

13 Pursuant to Local Bankruptcy Rule 2002-1(f)(1) and (2), any objections shall state briefly
14 the grounds therefor. If an objection states no grounds, the Court may strike the objection on the
15 *ex parte* motion of the moving party. The moving party, however, may make such *ex parte*
16 motion to strike only after the objecting party fails, within 10 days, to respond to a request by the
17 moving party for a brief statement of the grounds for the objection. If no objection is filed, and a
18 hearing is set, the opposing party must comply with Local Rules 9073-1(e)(1) and (2), which
19 state, in part, that an opposing party shall serve and file any objections, counter-affidavits, or
20 statements under penalty of perjury or other responding documents no more than three days prior
21 to the hearing on the application or motion.

22 IF NO RESPONSE IS TIMELY FILED AND SERVED, the Court may, in its discretion,
23 ENTER AN ORDER WITHOUT AN ACTUAL HEARING OR FURTHER NOTICE.

24 DATED this 15th day of August, 2007.

25 **NAGLER & ASSOCIATES**

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