

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 PLAN TRUSTEE'S
MOTION FOR ORDER APPROVING
SETTLEMENT AGREEMENT**

TO: **Counsel for the Tort Claimants Committee**
AND TO: **The Clerk of the Court**
AND TO: **All Recipients listed on Master Mailing List**
AND TO: **All Special Notice Recipients**
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 approving the "Settlement Agreement" entered into between the Plan Trustee and the Reorganized Debtor.

The factual and legal bases for approval of the Settlement Agreement are set forth in the Motion and supporting documentation. The terms of the Settlement Agreement are embodied in the proposed order included with the Motion. This proposed order, along with the Motion and all supporting documentation is enclosed with this Notice.

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

YOU ARE FURTHER NOTIFIED that any objections to the above must be in writing, must be filed with the Clerk of the United States Bankruptcy Court at 904 W. Riverside, Ste. 304, Spokane, WA 99201-1011 (mailing address: PO Box 2164, Spokane, WA 99210-2164), and must be served upon the undersigned counsel not later than JANUARY 23, 2008.

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

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

8 DATED this 31st day of December, 2007.

9 **NAGLER & ASSOCIATES**

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