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DEC 7 '04 PM 4:13 USBCEW

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Attorney for the Prepetition Committee of Clergy Sex Abuse Survivors

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

In re: THE CATHOLIC BISHOP OF SPOKANE a/k/a THE CATHOLIC DIOCESE OF SPOKANE, a Washington corporation sole, Debtors.	CASE NO. 04-08822-PCW11 Chapter 11 **VERIFIED STATEMENT OF JAMES I. STANG ON BEHALF OF PACHULSKI, STANG, ZIEHL, YOUNG, JONES & WEINTRAUB P.C. PURSUANT TO BANKRUPTCY RULE 2019**

James I Stang, on behalf of Pachulski, Stang, Ziehl, Young, Jones & Weintraub P.C. ("PSZYJW"), as attorneys for a committee consisting of James Biteman ("Biteman"), Michael Bordwell ("Bordwell"), Cheryl Corrigan ("Corrigan"), Michael Corrigan ("M. Corrigan"), John Magart ("Magart"), Mark Mains ("Mains"), Joseph Newbury ("Newbury"), and Michael Shea ("Shea") (collectively the "Prepetition Committee of Clergy Sex Abuse Survivors" or "Committee") in the above-referenced chapter 11 bankruptcy proceeding of the Catholic Diocese of Spokane (the "Debtor" or "Spokane Diocese"), makes the following statement pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure:

1. PSZYJW has been retained to serve as counsel to the Prepetition Committee of Clergy Sex Abuse Survivors in the above-captioned case. The

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address for the Committee is: Attn: James I. Stang, 10100 Santa Monica Boulevard, Suite 1100, Los Angeles, California 90067; and Attn: John W. Campbell, 960 Paulsen Building, 421 West Riverside Avenue, Spokane, WA 99201.

2. The total amount of the claims of the Committee, as of the date hereof, is undetermined. The Prepetition Committee of Clergy Sex Abuse Survivors is comprised of various plaintiffs to sexual abuse litigation against the Catholic Diocese of Spokane. The Committee is representative of the tort claimants who are survivors of sexual abuse perpetrated by certain priests and personnel under the authority of the Spokane Diocese. Each of the members of the Committee has suffered injuries arising from sexual abuse by priests and other personnel that were operating under the Debtor's authority.

3. James Biteman, whose address is 19203 98th Avenue South Renton, WA 98055, is a member of the Prepetition Committee of Clergy Sex Abuse Survivors. The total amount of Mr. Biteman's claim as of the date hereof, is undetermined. Mr. Biteman's claim arises from injuries suffered as a result of sexual abuse perpetrated by certain priests and personnel under the authority of the Spokane Diocese.

4. Michael Bordwell, whose address is 1825 Cherry Street, Clarkston, WA 99403, is a member of the Prepetition Committee of Clergy Sex Abuse Survivors. The total amount of Mr. Bordwell's claim as of the date hereof, is undetermined. Mr. Bordwell's claim arises from injuries suffered as a result of sexual abuse perpetrated by certain priests and personnel under the authority of the Spokane Diocese.

5. Cheryl E. Corrigan, whose address is 3806 W. Woodside Avenue, Spokane, WA 99208 is a member of the Prepetition Committee of Clergy Sex

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Abuse Survivors. The total amount of Ms. Corrigan's claim as of the date hereof, is undetermined. Ms. Corrigan's claim arises from injuries suffered as a result of sexual abuse perpetrated by certain priests and personnel under the authority of the Spokane Diocese.

6. Michael Corrigan, whose address is 4828 N. Belt, Spokane, WA 99205 is a member of the Prepetition Committee of Clergy Sex Abuse Survivors. The total amount of Mr. Corrigan's claim as of the date hereof, is undetermined. Mr. Corrigan's claim arises from injuries suffered as a result of sexual abuse perpetrated by certain priests and personnel under the authority of the Spokane Diocese.

7. John W. Magart, whose address is 3246 Bulldog Creek Road, Valley, WA 99181 is a member of the Prepetition Committee of Clergy Sex Abuse Survivors. The total amount of Mr. Magart's claim as of the date hereof, is undetermined. Mr. Magart's claim arises from injuries suffered as a result of sexual abuse perpetrated by certain priests and personnel under the authority of the Spokane Diocese.

8. Mark Mains, whose address is 21117 78th Avenue West, Edmonds, WA 98026 is a member of the Prepetition Committee of Clergy Sex Abuse Survivors. The total amount of Mr. Mains' claim as of the date hereof, is undetermined. Mr. Mains' claim arises from injuries suffered as a result of sexual abuse perpetrated by certain priests and personnel under the authority of the Spokane Diocese.

9. Joseph Newbury, whose address is Box 914, Chewellah, WA 99109 is a member of the Prepetition Committee of Clergy Sex Abuse Survivors. The total amount of Mr. Newbury's claim as of the date hereof, is undetermined. Mr. Newbury's claim arises from injuries suffered as a result of

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sexual abuse perpetrated by certain priests and personnel under the authority of the Spokane Diocese.

10. Mike Shea, whose address is 1301 S. Liberty Drive, Liberty Lake, WA is a member of the Prepetition Committee of Clergy Sex Abuse Survivors. The total amount of Mr. Shea's claim as of the date hereof, is undetermined. Mr. Shea's claim arises from injuries suffered as a result of sexual abuse perpetrated by certain priests and personnel under the authority of the Spokane Diocese.

11. The following are the facts and circumstances in connection with PSZYJW's retention as counsel by the Prepetition Committee of Clergy Sex Abuse Survivors: On October 14, 2004, James Stang and Hamid Rafatjoo of PSZYJW attended a meeting of attorneys representing survivors of sexual abuse perpetrated under the authority of the Spokane Diocese, in Spokane, Washington. At the conclusion of the meeting, the attorneys asked Messrs. Stang and Rafatjoo to represent plaintiffs in the Spokane Diocese sexual abuse litigation as a Committee in order to: (i) coordinate contingency planning in the event of a diocese bankruptcy, (ii) implement measures in advance of any such bankruptcy to protect their interests, (iii) avoid fragmentation of their interests, (iv) facilitate swift, concerted and effective action in the event of a bankruptcy, and (v) present their position to a bankruptcy court as an organized body representing their unique interests. Messrs. Stang and Rafatjoo agreed, on behalf of PSZYJW, to represent such a Committee at no charge.

12. Between October 14 and 29, 2004, plaintiffs' counsel consulted their clients and the clients named above formed the Committee.

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13. On October 30, November 13, November 22, 2004, and December 4, 2004, the Committee convened to discuss the aforementioned and other issues and to direct counsel on matters that would arise in this case.

14. The Committee has adopted the Bylaws of The Prepetition Committee of Clergy Sex Abuse Survivors (attached hereto as Exhibit "A") wherein it confirmed retention of PSZYJW as bankruptcy counsel.

15. Upon information and belief, PSZYJW does not possess any claims against or interests in the Debtor.

I, James I. Stang, certify under penalty of perjury that the foregoing statement is true and correct.

Executed this 6th day of December, 2004, at Los Angeles, California.

PACHULSKI, STANG, ZIEHL,
YOUNG, JONES & WEINTRAUB P.C.

By _____
JAMES I. STANG
Counsel for the Prepetition
Committee
of Clergy Sex Abuse Survivors

ESPOSITO, GEORGE & CAMPBELL, P.L.L.C.

By _____
JOHN W. CAMPBELL
Attorneys for the Prepetition Committee
of Clergy Sex Abuse Survivors

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