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Co-Counsel for Plaintiffs

Honorable Patricia C. Williams

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON
AT SPOKANE

In Re:)	NO. 04-08822-PCW11
THE CATHOLIC BISHOP OF)	DECLARATION OF TIMOTHY D.
SPOKANE a/k/a THE CATHOLIC)	KOSNOFF CONCERNING 10
DIOCESE OF SPOKANE, a Washington)	TORT PLAINTIFFS
corporation sole,,)	REPRESENTED BY MICHAEL T.
)	PFAU AND TIMOTHY D.
Debtor.)	KOSNOFF

I, TIMOTHY D. KOSNOFF, hereby declare as follows:

1. I am co-counsel for the 10 plaintiffs referenced in docket no. 505, AMENDMENT TO OBJECTION TO APPLICATION FOR AWARD OF COMPENSATION FOR SERVICES RENDERED AND REIMBURSEMENT OF COSTS PURSUANT TO 11 U.S.C. 330 (RIDDELL WILLIAMS, COUNSEL FOR TORT CLAIMANTS COMMITTEE, filed by the Debtor on June 6, 2005 ("10 Plaintiffs").

2. Each of the 10 Plaintiffs hold claims against the Diocese based on sexual abuse by its Priests and employees. These persons had, at the time of filing of this bankruptcy, every intent to file suit, but were prevented from doing so only by the filing of the bankruptcy and the resultant automatic stay.

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3. Each of the 10 Plaintiffs believe and assert that their interests are far more consistent with the constituents of the Tort Litigants Committee and believe that their interests are well represented by that Committee and its counsel.

4. The claims of members of the Tort Claimants Committee are not reflective of the interests and the claims held by the 10 Plaintiffs.

5. The 10 Plaintiffs have no confidence in the members of the Tort Claimants Committee and disclaim any connection to, or desire to be represented by that committee.

6. During discussions with the United States Trustee (“UST”) and counsel for the 10 Plaintiffs and other Plaintiffs we represent, there was consideration by the UST of using the fact of representation by counsel as the division between the two committees. Ultimately, the UST apparently determined that she would use the filing of a lawsuit as the line of demarcation between the committees. As can be seen, this line is based more on timing issues and the advent of the automatic stay than any substantive or significant difference between the 10 Plaintiffs who were deprived of the opportunity to commence their cases prior to filing and those that had filed their lawsuits.

7. We expect that in support of their fee application, counsel for that Committee will include our 10 Plaintiffs in their constituency in order to allege that their constituency includes 27 claimants rather than 17. For the reasons stated herein our clients do not consent to such representation.

DATED this 8th day of June, 2005.

/s/ Timothy D. Kosnoff
Timothy D. Kosnoff