

HONORABLE PATRICIA C. WILLIAMS

HEARING DATE: FRIDAY, 6/17/05
HEARING TIME: 9:00 A.M.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF WASHINGTON AT SPOKANE

In re

THE CATHOLIC BISHOP OF SPOKANE
a/k/a THE CATHOLIC DIOCESE OF
SPOKANE, a Washington corporation sole,

Debtor.

No. 04-08822-PCW-11

MEMORANDUM RE
{PROPOSED} ORDER
AMENDING ORDER
APPOINTING A LEGAL
REPRESENTATIVE FOR
UNKNOWN TORT CLAIMANTS
AND MINORS

COMES NOW Gayle E. Bush, appointed as representative for unknown tort claimants, and submits the proposed amended order attached hereto to the Order Appointing a Legal Representative.

The reasons for the changes are as follows:

- (1) In the other archdiocese cases and in other mass torts cases, the term “future tort claimants’ representative” is used more commonly used than “unknown tort claimants’ representative”. Accordingly, the

undersigned proposes use of the word “future” rather than
“unknown” for purposes of identification in this proceeding.

- (2) The classes of persons represented by the representative exist because of the extended limitation of actions provisions of RCW 4.16.340. The changed language to this Order in paragraphs 1.a. and 1.b. is proposed to recognize the express statutory language provided in RCW 4.16.340(1)(a) and (b).

RESPECTFULLY SUBMITTED this 14th day of June, 2005.

BUSH STROUT & KORNFIELD

By /s/ Gayle E. Bush
Gayle E. Bush, WSBA #07318
Future Claimant Representative