

**NARRATIVE SUMMARY
OF
BUSH STROUT & KORNFIELD
ATTACHMENT A**

I. BACKGROUND OF THE CASE

The Debtor filed its Chapter 11 petition on December 6, 2004. In part, the Debtor filed for bankruptcy protection in order to deal with several lawsuits filed against it by plaintiffs claiming that they had been sexually abused by clergy members. The Debtor sought the employment of representatives for certain of those tort claimants.

Gayle Bush was employed to represent certain tort claimants: those who are minors, those who have repressed their memory of the abuse, and those who know they were abused by having failed to make a connection between the abuse and damages that they have suffered. None of these claimants had filed lawsuits prior to the Debtor's bankruptcy petition, and are referred to as "future claimants." Gayle Bush is referred to as the Future Claims Representative ("FCR").

III. STATUS OF THE CASE

The FCR's role in this case is limited to representation of certain tort claimants, therefore this description will only address those aspects of the case with which the FCR is involved. Currently, the parties are working on numerous issues. Specifically, they are determining a process by which claims should be filed, and attempting to quantify those claims.

IV. DESCRIPTION OF TASKS OR PROJECTS FOR WHICH COMPENSATION IS SOUGHT

This is the FCR's first application for fees. This application includes substantial work done in the early months covered by this application in reading materials related to the background of the case, determining the role of the FCR, and scope of responsibilities. It involved becoming familiar with certain issues related to causal link and repressed memory claimants.

The FCR spent a substantial amount of time in meetings with many of the constituents in this case and/or their counsel. The primary purpose of those numerous meetings was to seek a consensual resolution of the bankruptcy case in general. I met several times with Mr. Pfau, Mr. Kosnoff and Mr. Jackson relating to issues involving the claimants they represent. In addition, I had numerous telephone discussions with Mr. Stang regarding the committee he represents. I

had meetings and numerous telephone discussions with Mr. Shickich and the committee he represents regarding resolution of the overall bankruptcy case.

I met several times and had numerous discussions with Ford Elsaesser and John Munding, who represent the parishes. I met once with Archbishop Skylstad, the Vicar General, in-house legal counsel, and representatives of the Paine Hamblen firm regarding the Diocese case. Additionally, I met with Mr. Arpin, Mr. Paukert and Mr. Cross for one day on continued discussions with them in an attempt to institute settlement discussions between the constituents in this case.

I have also met with Nancy Isserlis, Gary Dyer, members and representatives of the Association of Parishes and some of the claimants in the bankruptcy case. Ultimately, and I believe directly related to those discussions, there has been activity relating to an attempt to resolve the case.

I spent considerable time related to issues regarding the scope of my authority as to whether or not I will file a claim on behalf of causal link claimants, and have prepared various pleadings regarding the bar date notice and have had extended discussions with counsel relating to the bar notice hearing in the case.