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

In re:)	
)	Case No. 04-08822-PCW-11
THE CATHOLIC BISHOP OF)	
SPOKANE a/k/a THE CATHOLIC)	
DIOCESE OF SPOKANE,)	NOTICE OF DEBTOR'S
)	MOTION AND
)	APPLICATION FOR
)	EMPLOYMENT OF
Debtor.)	HAWKINS & EDWARDS,
)	INC. AS EXCLUSIVE
)	BROKER FOR SALE OF
)	REAL PROPERTY LOCATED
)	AT 707 N CEDAR STREET
)	[Docket No. 756] AND TIME
_____)	TO OBJECT

PLEASE TAKE NOTICE that The Catholic Bishop of Spokane, a
Washington corporation sole, the debtor and debtor-in-possession herein (the

NOTICE OF DEBTOR'S MOTION TO
EMPLOY HAWKINS & EDWARDS, INC.
AND TIME TO OBJECT - 1

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1 "Diocese" or the "Debtor"), has filed a Motion seeking approval of the
2 employment of Hawkins & Edwards, Inc. ("Hawkins & Edwards") as its
3 exclusive agent and broker for the sale of certain real property located at 707
4 N. Cedar Street, Spokane, Washington, legally described as the South 20' of
5 Lot 4 and all of Lots 5 and 6 of Chandler Second Addition, Spokane, Spokane
6 County, Washington (the "Property"). The Diocese requires the services of
7 Hawkins & Edwards to assist in the marketing and sale of the Property. The
8 proposed employment of Hawkins & Edwards is pursuant to the terms of the
9 Motion for Order Approving Employment of Hawkins & Edwards, Inc. as
10 Exclusive Broker [Docket No. 756] and the Listing Contract which is attached
11 thereto. A copy of the Motion may be reviewed at the office of the Clerk of
12 the United States Bankruptcy, or may be viewed on the internet at
13 www.waeb.uscourts.gov, or may be obtained by written request from the
14 undersigned counsel for the Diocese.
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22 The Diocese seeks approval of the Listing Contract with Hawkins &
23 Edwards pursuant to 11 USC §328(a). Under the Listing Contract, Hawkins &
24 Edwards will be paid a commission of six percent (6.0%). In the event that
25 the purchaser of the Property is represented by a buyer's agent, the six percent
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1 (6.0%) commission will be split between Hawkins and Edwards and the
2 purchaser's agent.
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4 The Listing Contract commences on August 12, 2005 and expires on
5 October 11, 2006, or upon the closing of the sale of the Property, whichever
6 occurs first.
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8 PLEASE TAKE NOTICE that if you object to the employment of
9 Hawkins & Edwards as the exclusive agent and broker for the sale of the
10 Property, you must file a written objection with the Clerk of the United States
11 Bankruptcy Court for the Eastern District of Washington, 904 W. Riverside
12 Avenue, Spokane, WA 99210, and serve the same upon the undersigned
13 counsel for the Diocese not later than twenty-three (23) days from the date of
14 this Notice. If you fail to timely and properly object, the relief requested may
15 be granted without hearing and without further notice to you.
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21 Pursuant to Local Rule 2002-1(f)(1) and (2), any objection shall state
22 briefly the grounds therefore. If an objection states no grounds, the Court may
23 strike the objection on an ex parte motion of the moving party. The moving
24 party, however, may make such ex parte motion to strike only after the
25 objecting party fails, within ten (10) days, to respond to a request by the
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1 moving party for a brief statement of the grounds for the objection. If an
2 objection is filed, and a hearing is set, the opposing party must comply with
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4 Local Rule 9073-1(e)(1) and (2) which state, in part, that an opposing party
5 shall file and serve any objections, counter-affidavits, or statements under
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7 penalty of perjury or other responding documents no more than three (3) days
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9 prior to the hearing on the application or motion. Further, a copy of any
10 document intended to be considered by the Court in connection with the
11 scheduled hearing shall be delivered to the appropriate chambers if the
12 document has not been filed at least seven (7) days prior to the hearing.
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15 DATED this 20th day of October, 2005.

16 PAINE, HAMBLIN, COFFIN,
17 BROOKE & MILLER, LLP
18

19 By /s/ Michael J. Paukert
20 Michael J. Paukert
21 Shaun M. Cross
22 Attorneys for the Catholic Bishop
23 of Spokane a/k/a the Catholic
24 Diocese of Spokane
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29 NOTICE OF DEBTOR'S MOTION TO
30 EMPLOY HAWKINS & EDWARDS, INC.
AND TIME TO OBJECT - 4

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