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CATHOLIC CHARITIES,  
MORNING STAR BOYS RANCH,  
CATHOLIC CEMETERIES - HOLY CROSS  
IMMACULATE HEART RETREAT CENTER

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

**In Re:**

**THE CATHOLIC DIOCESE OF  
SPOKANE,**

**Debtor.**

**No. 04-08822-PCW 11**

Chapter 11

AMENDED OBJECTION TO  
DEBTOR'S MOTION TO SELL  
REAL PROPERTY LOCATED  
AT 707 N. CEDAR STREET  
[TO CORRECT CERTIFICATE  
OF MAILING ONLY]

**I. OBJECTION**

Catholic Charities of the Diocese of Spokane is a Washington not for profit corporation and a potential creditor of the Debtor's Bankruptcy Estate, hereby objects to Debtor's Motion to Sell Real Property located at 707 North Cedar Street, Spokane, Washington.

Catholic Charities occupied the premises from World War II to 2004. During its period of occupancy, Catholic Charities, Inc., at its sole expense, improved and

OBJECTION TO SALE: 1

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1 maintained the real property with the understanding that Catholic Charities, was the  
2 beneficial and equitable owner of all interest in the real property to the exclusion of  
3 all others including the Debtor. Among other things, Catholic Charities remodeled  
4 the premises on three different occasions and significantly expanded and improved  
5 the structures on the property described.

6 Catholic Charities, Inc. has a claim to and/or an interest in the real property  
7 which is not addressed by the "Motion to Sell."

8 Catholic Charities, Inc. objects to the sale to the extent that any money derived  
9 from the sale is used to pay for administrative expenses. The money from the sale  
10 should be sequestered to pay creditors including Catholic Charities.

## 11 **II. RELIEF SOUGHT**

12 Wherefore, it is requested that this objection be noted and hearing on this  
13 matter be set.

14 DATED at Spokane, Washington this 9<sup>th</sup> day of November, 2005.

15 KEEFE, KING & BOWMAN, P.S.  
16

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Additionally, on the above date, copies of this document were served via U.S. Mail (first class) on each individual and/or entity identified on the Court's Limited Master Mailing List retrieved from the Court's website at <http://www.waeb.uscourts.gov/LargeCases/catholicbishop/04-08822.html>, a copy of which is attached as Exhibit A hereto.

/CHRISTOPHER J. KERLEY, WSBA #16489

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**EXHIBIT A**

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