CLERK, U.S. BANKRUPTCY COURT
DISTRICT OF OREGON

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UNITED STATES BANKRUPTCY COURT

DISTRICT OF OREGON

In re Roman Catholic Archbishop of Portland in Oregon, and successors, a corporation sole, Debtor.	Case No. 04-37154-elp11 Chapter 11 JOINT APPLICATION TO APPOINT FUTURE CLAIMS EVALUATION CONSULTANT AS INDEPENDENT EXPERT (Hamilton, Rabinovitz & Alschuler, Inc.)

David A. Foraker, the Future Claimants Representative in this case (the "FCR"), Roman Catholic Archbishop of Portland in Oregon, and successors, a corporation sole

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(the "Debtor"), and the Tort Claimants Committee (the "Committee", and together with the FCR and the Debtor, "Applicants") jointly apply for an order appointing Hamilton, Rabinovitz & Alschuler, Inc. ("HR&A") as an independent expert, or for an order under Rule 706(a) of the Federal Rules of Evidence appointing HR&A as a Court-appointed expert, for purposes of developing, in consultation with Applicants, a data base and analytical models for use in estimating and valuing the "future" claims of the child abuse victims for which the FCR is the legal representative and in designing a tort claims resolution facility. In support of this application, Applicants represent:

1. On July 6, 2004, the Debtor commenced this reorganization case by filing a voluntary petition for relief under Chapter 11 of the Bankruptcy Code. The Debtor continues to manage its properties and affairs as debtor in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code. On or about July 14, 2004, the Committee was formed by the United States trustee, pursuant to section 1102 of the Bankruptcy Code. No trustee or examiner has been appointed in this case.

2. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and LR 2100-1. This application is a core matter under 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

3. Applicants believe it is essential that a consultant with substantial experience in estimating "future" claims in "mass tort" cases be appointed in this case to assist them in developing a data base and analytical models for use in estimating and valuing the claims of the "Future Claimants," as defined in this Court's December 20, 2004, Order Appointing Future Claimants Representative (the "FCR Appointment Order"). The Future Claimants are defined in the FCR Appointment Order as those injured persons holding child abuse claims who as of April 29, 2005, "(1) are under the age of 18 and whose parent or legal guardian has not filed a claim in this case; (2) are suffering from 'repressed memory' and cannot remember the child abuse; or (3) have not

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discovered the injury or the causal connection between the injury and the child abuse, nor in the exercise of reasonable care should have discovered the injury or the causal connection between the injury and the child abuse." (FCR Appointment Order, 2:1-7.) In order to estimate the number, nominal amounts and net present value of the child abuse claims of the Future Claimants, Applicants will need, among other resources, assistance from experienced consultants.

4. Applicants request that HR&A be appointed as an independent expert. The services to be provided by HR&A will consist of (i) the development of a data base and analytical models for use in estimating and valuing the claims of the Future Claimants, (ii) consultation with Applicants with regard to the design of a tort claims resolution facility and (iii) expert testimony, if necessary. Applicants have selected HR&A because HR&A is a leading expert on matters relating to the estimation of "future" claims and the administration of claims resolution facilities in "mass tort" cases. Francine F. Rabinovitz, Ph.D., HR&A's Executive Vice-President, has provided consulting services for debtors, future claims representatives, insurance companies and shareholders in numerous Chapter 11 and "mass tort" cases. Dr. Rabinovitz's curriculum vitae is attached hereto as Exhibit A.

5. HR&A's services will be billed to the estate for payment as an administrative expense under sections 503(b) and 507(a)(1) of the Bankruptcy Code. HR&A intends to seek and accept compensation in accordance with any fee procedures orders of record in this case and apply to the Court for the allowance and payment of compensation for professional services rendered, and reimbursement of expenses incurred, in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules and any orders of this Court applicable to estate professionals generally. HR&A has agreed to accept as compensation and expense reimbursement only such sums as may be allowed by the Court, and understands that

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interim fee awards and final fee requests are subject to Court approval. No other arrangement or agreement exists between Applicants and HR&A with respect to the payment of fees and expense reimbursements in this case.

6. The proposed rate of compensation, subject to final Court approval, is the discounted hourly rates set forth below:

Position	Customary Rate	Discounted Rate
Senior Partners	$500	$325
Junior Partners	450	325
Principals	400	325
Directors	350	325
Managers	300	300
Senior Analysts	250	250
Analysts	175	175
Research Associates	150	150

Provided, however, that time spent testifying in depositions or at Court hearings will be billed at 150 percent of the discounted hourly rates set forth above. Applicants presently estimate that HR&A's fees will not exceed $100,000 in the aggregate. This estimate, however, is not a firm number and it may prove to be materially inaccurate. Due to the unique nature of the project, it is extremely difficult at the outset of the engagement to estimate with any reasonable degree of certainty the amount of professional time that will be required to fulfill this engagement.

7. Except as disclosed in the Rule 2014 Verified Statement of Proposed Professional which accompanies this application, to the best of Applicants' knowledge, HR&A does not represent any entity that has an interest materially adverse to the estate or to the classes of creditors being represented by the FCR and the Committee, nor does HR&A have any connection with the Debtor, creditors or any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, or any District of Oregon bankruptcy judge. To

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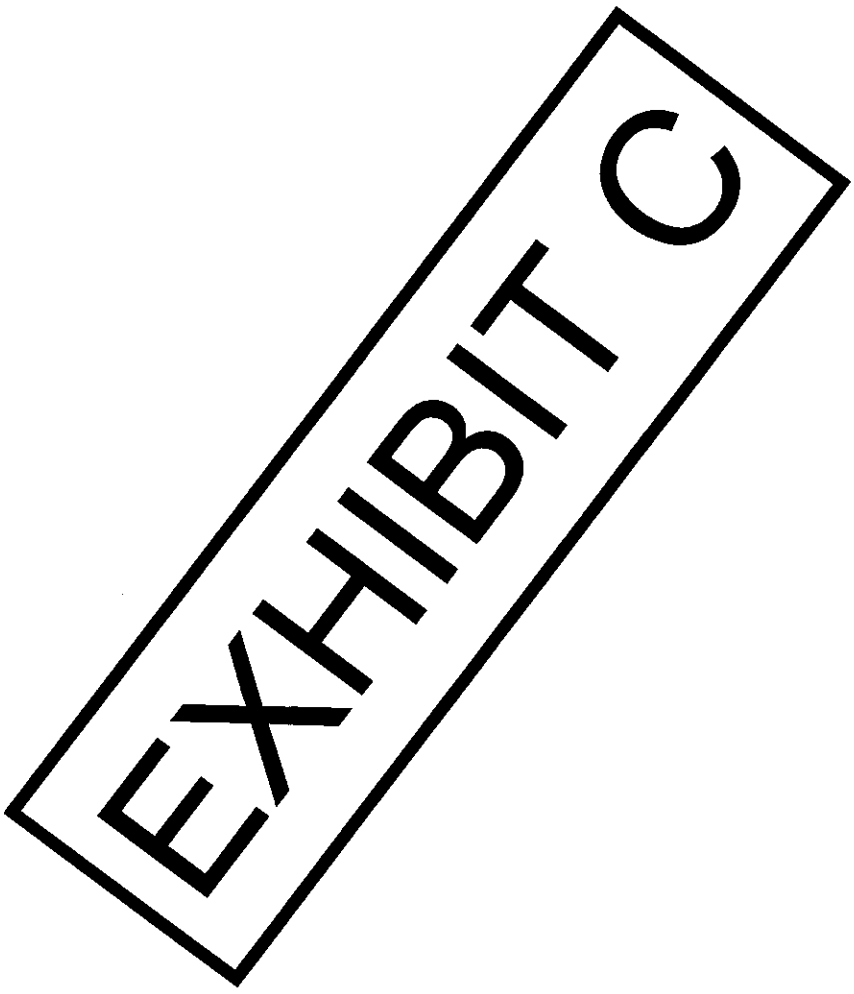
EXHIBIT C

the best of Applicants' knowledge, HR&A is a disinterested person within the meaning of section 101(14) of the Bankruptcy Code.

8. The United States trustee does not oppose this application.

WHEREFORE, Applicants request that the Court enter an order, effective as of the date of this application, appointing HR&A as an independent expert for the purposes stated above, on an hourly basis, with compensation and reimbursement of expenses to be determined, allowed and paid by the estate as an administrative expense under sections 503(b) and 507(a)(1) of the Bankruptcy Code, pursuant to applications to be filed from time to time and in accordance with fee procedures orders in effect from time to time, subject, however, to a cap on fees of $100,000 in the aggregate unless a greater amount is authorized by the Court after further application.

Dated: March 4, 2005.

Greene & Markley, P.C.

David A. Foraker, OSB # 81228
Attorneys for Future Claimants Representative

Dated: March 4th, 2005.

Sussman Shank LLP.

Thomas W. Stilley, OSB # 88316
Attorneys for Debtor in Possession

Dated: March 4th, 2005.

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Albert N. Kennedy, OSB # 82142
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FRANCINE F. RABINOVITZ, PH.D.

EDUCATION

Cornell University (B.A.) 1961, Phi Beta Kappa

Massachusetts Institute of Technology (Ph.D.) 1965

PROFESSIONAL EXPERIENCE

2000-	Executive Vice President, Hamilton, Rabinovitz & Alschuler, Inc. (HR&A), and Professor Emeritus, University of Southern California
1995-00	Executive Vice President, Hamilton, Rabinovitz, & Alschuler, Inc. (HR&A) and Professor, University of Southern California
1976-95	Vice President, HR&A and Professor, University of Southern California
1982:	Distinguished Visiting Professor, University of Texas, Austin
1975:	Professor, University of California, Los Angeles
1973-75:	Associate Professor, Massachusetts Institute of Technology
1968-73:	Assistant Professor to Associate Professor, University of California, Los Angeles. Joint appointment, Department of Political Science and School of Architecture and Urban Planning
1966-68:	Assistant Professor, Department of Political Science and Center for Latin American Studies, University of Florida
1965-66:	Lecturer, Department of Political Science, Douglass College, Rutgers University

CLAIMS AUDIT AND ESTIMATION SERVICES

- More than two dozen confidential estimates for public and private companies and insurers of their possible tort liabilities in various mass tort situations for purposes of estimating future claims, reserves, planning, risk management, SEC reporting, due diligence, reorganization and/or the sale or acquisition of assets.

- Consultant to Ashland Inc. re Riley Stoker asbestos liability, Cabot Corp. re American Optical asbestos liability, Halliburton Co., in the valuation of asbestos and silica claims against Dresser subsidiaries and KBR, and to Honeywell re Narco and Bendix. (All current)

- Court appointed expert for the Property Damage Committees in In re: WR Grace, Inc and In re: USG in the valuation of asbestos property damage claims. (Current)

- Court appointed expert for the Legal Representative of Future Claimants in In re: JT Thorpe, In re: Quigley, In re: The Owens Corning Corp., In re AcandS Inc., and In re: Western Asbestos Company, Western MacArthur Company, and MacArthur Company. (All current)

- Court appointed expert for the Debtor in In re: MidValley et al (Dresser) and for the Shareholders In re: Pittsburgh Corning (PPG Industries).

- Expert for Platinum Equity LLC in Rohn Industries v Platinum Equity on asbestos related status of peripheral defendants.

- Expert for The Dow Chemical Co. in Kelley-Moore Paint Co. Inc vs Union Carbide Corp. on estimates of future asbestos liability. (Current)

- Consultant to The Dow Chemical Co. and the Asbestos Study Group on the estimation of future asbestos claims in a national asbestos Trust under S.1125 and S2290. (current)

- Provide independent expert services to review the implications of the sale of Manville stock to Berkshire Hathaway and estimate future asbestos liabilities for the Manville Personal Injury Trust, on behalf of the Representative of Future Claimants. (Current)

- In re: Silicone Gel Breast Implant Products Liability Litigation. Consultant to the Dow Chemical Company, with responsibility for "shadowing" claim estimation and analysis by Dow Corning and by the Tort Claimants with respect to estimation of the numbers and costs of silicone implant products liability claims. Currently shadow "Independent Assessor" for evaluation of Dow Corning Settlement Facility claims and payment processes.

- Consultant to Hartford Accident and Indemnity Co. and to Liberty Mutual

Insurance Co. on various issues relating to estimation of future asbestos liability of insureds and/or assignment of asbestos liability to policy and coverage periods.

- Expert for the Legal Representative of the Future Claimants in In re: The Celotex Corporation and Carey Canada, Debtors.

- Expert in Falise et. al. v. The American Tobacco Company et.al. to estimate tobacco's share of the Manville Trust's asbestos liability and costs. Similar estimation work for the HK Porter Trust and for Raymark Industries .

- Provide analyses to Oak Hill Advisors, Inc., a high yield fund manager, of six companies as to potential future asbestos liability, to inform bond investment decisions.

- In re: Bankruptcy of Fuller-Austin Corporation, served as a consultant to parent company, DynCorp, in pre-packaged bankruptcy filing of asbestos insulation installer Fuller-Austin, with respect to the terms of Fuller-Austin's release of DynCorp from alter ego or veil piercing liability for present and future Fuller asbestos claims.

- Served as an expert in In re: A. H. Robins for purpose of estimating the value of claims against the company arising from litigation over the Dalkon Shield. Estimate used by Court as its order, among six expert estimates which covered a $9 billion range. Affirmed by 4th Circuit citing this estimate.

- Served as a court-appointed Expert in the U.S. Federal District Court, Northern District of Ohio. Developed the Computerized Case Evaluation Process used in the Ohio Asbestos Litigation for settlement effort with respect to 100 cases of alleged asbestos injury. All cases settled within one year.

- Expert for the U.S. in The Islamic Republic of Iran v. The U.S.A. (Iran-U.S. Claims Tribunal, The Hague) with respect to estimation and strategy of U.S. in defending claims arising around delivery of service and billings for the U.S. Foreign Military Sales Program.

- HR&A engaged by attorneys for the lead defendant in In re: Agent Orange, heard in the Federal District Court for the Eastern District of New York, Judge Jack B. Weinstein presiding. Assisted in drafting the proposed questionnaire for prospective jurors that was extensively incorporated into the final questionnaire that the Court actually administered to several hundred candidates. Also managed preparation of a detailed plan for environmental health examination and treatment of Vietnam veterans which was submitted to the Court. The case was then the largest class action ever filed in the United States.

- Managed for ISO the first rigorous, nationwide (24-State sample) analysis of the probable impact on indemnity payments to bodily injury claimants that would result

from the unprecedented wave of legislated, generic change in the tort law that was enacted or debated within many States during 1986. Also managed, in 1987, the first study projecting such effects to be based on a large random sample of actual closed claims from all major carriers operating in a given State (Hawaii).

- Directed wide-ranging expert analyses and assessments in connection with other toxic tort litigation. The asbestos-related work generated the proposal that led to the founding of the Asbestos Claims Facility, the first example of a voluntary effort to reduce the overhead cost drain involved in resolving mass tort claims.

- Managed HR&A's pioneering DATACLAIM, HARMWORTH, and CLAIMWORTH systems for computer-aided analysis of, and assistance to, the claim evaluation and negotiation practices of insurance claim personnel, and the application of these systems in major property/casualty insurers (both personal injury an property damage).

- Managed the feasibility study that proposed and subsequently led to establishment of the Institute for Civil Justice (housed at the RAND Corporation), the nation's first institution dedicated to advanced and impartial analysis of the civil justice system, and currently its primary source of rigorous empirical research concerning that system.

- Co-directed a one-year study of the historical evolution and social consequences of the tort system for the California Citizens' Commission on Tort Reform. (Deputy Director of the privately financed Study Commission.)

- Was a co-founder and Vice President of EnDispute, Inc., the nation's first source of the full range of alternative dispute resolution services.

INTERIM MANAGEMENT OF CLAIM FACILITIES

- Continuing role in oversight of set up and operation of the Dow Corning Settlement Facility, a claim handling facility for all implant claims arising from Dow Corning implants. (Current)

- Set up and managed the operation of the Breland Trust, a claims handling facility for 37,665 "late" claimants in the Dalkon Shield litigation. Facility sent notices, received claims, analyzed trends. Transferred relatively seamlessly to Dalkon Shield Trust one year later.

- Set up and managed the operation of the Celotex Asbestos Claimants Trust, a claims handling facility for all claimants against the Celotex Corporation and Carey Canada, Inc. until the hiring of a permanent CEO and staff. During the fifteen week start-up period, processed over 6,000 claims.

OTHER LAW-RELATED SERVICES

- Expert on the impact of at-large elections in actions brought under the 1982 Voting Rights Act, in Romero v. City of Pomona, Soria v. City of Oxnard, Aldasoro v. El Centro Elementary School District, Reyes et. al. v. City of Dinuba, Valladolld v. City of National City, Chicano Federation v. City of National City, Badillo v. City of Stockton, Debaca v. County of San Diego, Valdez v. City of Santa Maria., Ruiz v. City of Santa Maria, and USA vs City of Santa Paula.

- Black Probation Officers Assn. v. County of Los Angeles, et al. Consultant to the County of Los Angeles with respect to allegations of geographical and promotion discrimination against the County Probation Department, the nation's largest such agency.

- Proyecto Pastroal at Dolores Mission and Southern Christian Leadership Conference of Greater Los Angeles v. County of Los Angeles. Consultant to the County of Los Angeles with respect to allegations of discrimination under Title VI of the Civil Rights Act in the distribution of funds for gang diversion.

- Expert in a series of cases alleging discrimination in the rental of housing derived from "auditing" methodology in FHCSC v. Beaumont Property Management, Goltz v. Sunset Poinsettia, Westside Fair Housing v. Westchester Madrid, USA v. Rassekhi, and Raeet Taddesse v. Choi J. Yung, et al.

- For the Special Master and the Honorable William Wayne Justice, in the remedy phase of Young v. Pierce, a case involving the public housing authorities in East Texas, provided technical assistance analyzing the large database being produced quarterly by the housing authorities with respect to the establishment of race neutral admission to tenancy in public housing in the region.

- Served as Special Assistant to the Special Master in U.S. v. Michigan in the Federal District Court for the Western District of Michigan. Case involved allocation of fishing rights in the Great Lakes. Supervised building of computer model to assess impact of different options and participated in settlement negotiations. Case settled.

- Served as a court-appointed Expert on administrative and financial issues raised by plans to desegregate the Los Angeles School system in support of the Court's responsibility to oversee implementation of Crawford v. Los Angeles Board of Education. Conducted a supplementary study of the impact of Proposition 13 on the financing of the Los Angeles School District. (Chairman of the expert group for administrative purposes.) Built and applied the nation's first computer-based simulation model of school desegregation.

- Served as Special Monitor for the Court to assist the Los Angeles Superior Court supervising the design and implementation of a plan to desegregate the second

largest school system in the United States. Served under two different judges in discharging this responsibility.

- Served for six years as court-appointed Referee for the Los Angeles Superior Court to monitor the progress in implementing a settlement agreement in Federation of Hillside and Canyon Associations v. City of Los Angeles, which compels the City to make its zoning ordinance consistent with 35 community plans. Some 300,000 of 800,000 City parcels are affected.

- Directed team of experts analyzing demographics of client population receiving General Relief in Washington v. County of San Diego Board of Supervisors.

- Expert in City of Los Angeles and Freddie Robinson et al v. County of Los Angeles et al, a class action with respect to the County system for providing General Relief to the poor.

- Consultant on technical requirements for trademark confusion surveys in In re: Circuit Breaker Litigation.

- Conducted the first "disparity" study done for Los Angeles County as required for minority/female business set asides by Croson v. City of Richmond.

- Consultant to the Los Angeles County Metropolitan Transportation Authority in the aftermath of the decision in Cornelius v. The MTA rejecting its set-aside program.

- By order of the U.S. District Court of the Central District of California directed a management audit of the process for achieving the minority and female employment goals of the Consent Decree in Keith v. Volpe.

- Expert in Bronson et. al. v. Cincinnati Board of Education in support of motion by fourteen suburban school districts to dismiss the case against them brought by the NAACP on the grounds that their actions caused city school segregation. Motion was dismissed on the papers by Judge T. Porter.

- Directed a team simulating the probable impacts of alternative hydrological scenarios on the power plants and water diversion in the Potter Valley, California, for a law firm in a settlement procedure mandated by the Federal Energy Regulatory Commission.

- Conducted an analysis of annexation and minority interests in Houston for the Legal Department of the City, assessing the city's approach to analyzing the marginal fiscal impacts on the city. Analyses were directly incorporated into briefs to the Attorney General of the United States.

- Conducted an intensive examination of the structure, operations, and responsiveness of the nation's largest county government under a grant to the Los Angeles County Bar Association. Included was a detailed analysis of the workings of the Office of the Assessor, the CAO, the Sheriff and the District Attorney. Assisted in the preparation of proposals for the ballot. (Deputy Director of the foundation-financed study commission, the Los Angeles Public Commission on County Government.)

DIRECTORSHIPS AND AFFILIATIONS

Member, the 1999 Charles E. Merriam Award Committee of the American Political Science Association.

Member, Advisory Committee, Structural Engineers Applied Technology Council, Federal Emergency Management Agency (FEMA), 1997 - 1999.

Chair, Los Angeles Zoo, Director's Advisory Committee, 1993 - 1995.

Member, Advisory Committee, Princeton University Urban and Regional Research Center, 1981-1987.

Member, Board of Trustees, National Academy of Public Administration, 1979-82.

Member, National Academy of Public Administration, Evaluation Panel for HUD Fiscal Capacity Sharing Program, 1979-81.

Member, Evaluation Advisory Group, The Police Foundation, 1970-75. (Kansas City Preventive Patrol Experiment, Women in Policing Experiment, Cincinnati Community Policing Experiment, San Diego Stop and Frisk Project and others)

Member, Advisory Committee, Urban Institute, 1969-80.

Member, Council, Policy Studies Organization, 1976-78.

Member, Executive Council, American Political Science Association, 1974-76.

Editorial Board, Journal of American Public Policy and Management, (John F. Kennedy School of Government, Harvard University) 1981-1986.

Editorial Board, Journal of Urban Affairs, 1981-1984.

Editorial Committee, Comparative Urban Research, 1972-1982.

Editorial Board, Journal of Politics, 1972-74.

Editorial Board, Latin American Research Review, 1972-73.

Member, Gladys M. Kammerer Award Committee (U.S. national politics), American Political Science Association, 1971-72.

Member, National Screening Committee, Foreign Area Fellowship Program, Social Science Research Council (Latin American and the Caribbean), 1971-72.

Member, Committee on the Status of Women, Western Political Science Association, 1968-73.

Member, Executive Committee, Comparative Administration Group, American Society for Public Administration, and Chairman, Committee on Urban Administration and Politics, 1968-70.

AWARDS

Presidential Appointee, Visiting Committee, Department of Urban Studies and Planning, Massachusetts Institute of Technology, 1993-1997

Certified Planner, American Institute of Certified Planners, 1986.

Fellow, Urban Land Institute, 1976-1986.

Winner of 1981 James E. Webb Urban Research Award, National Academy of Public Administration (with Edward K. Hamilton, for simulations of school desegregation alternatives.)

Harry M. Scoville Award, Los Angeles Metropolitan Chapter, American Society for Public Administration, 1975 (award to a young researcher, teacher, or government employee for distinguished performance in public administration).

Department of Housing and Urban Development, Certificate for Meritorious Service, 1968.

Woodrow Wilson Fellow, 1961-62.

National Defense Education Act Fellow, 1964-71.

Phi Kappa Phi, 1961.

Phi Beta Kappa, 1960.

PUBLICATIONS

BOOKS

Comparative Urban Politics, with R. Fried (Englewood Cliffs, N.J.: Prentice Hall, 1980).

Minorities in Suburbs: The Los Angeles Experience (Lexington: D.C. Heath, 1977).

City Politics and Planning (New York: Atherton Press, 1969). Sections of this book have been reprinted in: Andreas Faludi, Reader in Planning Theory (Oxford: Pergammon Press, 1972), C. E. Elias, Jr., City Planning (Belmont: Wadsworth, 1972), and W. Hawley and F. Wirt, The Search for Community Power (Englewood Cliffs: Prentice Hall, 1974).

Latin American Urban Research (Beverly Hills: Sage Publications). Vol. I (1971) edited with F. Trueblood; Vol. II (1972) edited with J. Hardoy and G. Geisse (this volume appears in Spanish from Ediciones SIAP, Buenos Aires); Vol. III (1973) edited with F. Trueblood.

On the City's Rim: Politics and Policy in Suburbia, with F. Wirt, B. Walter, and D. Hensler (Lexington: D.C. Heath, 1972).

Urban Government for Greater Stockholm, with Hans Kalmfors and Daniel Alesch (New York: Praeger, 1968).

Latin-American Political Systems in an Urban Setting, with F. Trueblood and C. Savio (Gainesville: Center for Latin- American Studies, University of Florida, 1967).

ARTICLES

"Limits to Environmental Protection Innovation: Can EPA Accommodate California and Other Leading Edge States?," with Paul J. Silvern, background papers for National Academy of Public Administration, Transforming Environmental Protection for the 21st Century, Washington, D.C., November 2000.

"Applying the Jobs/Housing Balance Concept", with Edward K. Hamilton, John H. Alschuler, and Paul J. Silvern, Urban Land. October, 1991 pp. 15-18.

"Money, Medicine and Homelessness: What Should Be Done?" Society. Vol.

26, No. 4 (May/June 1989) pp. 12-13.

"The Role of Negotiation in Planning, Management, and Policy Analysis," Journal of Planning Education and Research. Vol. 8, No. 2 (1989) pp. 87-95.

"Rezoning Los Angeles: The Administration of Comprehensive Planning," Public Administration Review. Vol. 49, No. 4 (1989) pp. 330-335.

"The Los Angeles Rent Stabilization Program: Update 1985," Rental Housing in California. ed. L. Graymer, J. Dimento and F. Schnidman (Oelgeschlager, Gunn & Hain: Boston, 1987) pp. 97-104.

"Handling Hazardous Waste" in California Policy Choices. Ed. J. Kirlin and D. Winkler, Vol. 2, May 1985.

"Cutting the Overhead Costs of Resolving Asbestos Claims," with Edward K. Hamilton and others, Journal of Products Liability. Vol. 6, No. 1 (1983) pp. 17-94.

"Guidelines," special issue of Policy Sciences, ed. with M. Rein and J. Pressman, December, 1976. "Guidelines: A Plethora of Forms, Authors and Functions," reprinted in J. E. Tropman, M. J. Dluhy and R. M. Lind, New Strategic Perspectives on Social Policy (Oxford: Pergamon Press, 1981).

"Alternative Electoral Structures and Responsiveness to Minorities," with Edward K. Hamilton, National Civic Review. Vol. 69, No. 7 (July 1980) pp. 371-386.

"On Piper-Payers and Tune-Callers: Proposition 13 and the Financing of the Los Angeles Unified School District," with Edward K. Hamilton, National Tax Journal, Special Supplement (Vol. XXXII, No. 2, June 1979).

"Whose Ox Would Be Healed?: The Financial Effects of Welfare Federalization," with Edward K. Hamilton. A summary of this monograph appears in Welfare: The Elusive Consensus, ed., Lester M. Salamon (New York: Praeger, 1978).

"Implementation: A Theoretical Perspective," with Martin Rein, in American Politics and Public Policy, eds., W. D. Burnham and M. W. Weinburg (Cambridge: The MIT Press, 1978).

"The Study of Urban Politics and the Politics of Urban Studies," Comparative Urban Research #5, 1974. Also appears in Comparative Urbanization: Papers of the Colloquium on Research Traditions in the Comparative Study of Urbanization, ed., John Friedmann (University of California Press, Los Angeles, 1973).

"Rhetoric vs. Performance: The National Politics and Administration of U.S. New Communities Legislation," with Helene Smookler, in Human Factors in New Town Development, eds., Harvey Perloff and Neil Sanberg (New York: Praeger, 1973).

"Public Policy Determinants of Urban Growth in Latin America," with Robert Fried, in Urban Growth in Small Latin American Nations, ed., G. Antonini (Gainesville: University of Florida Press, 1973).

"Can Something be Done? Propositions on the Performance of Metropolitan Institutions," with Steven Erie and John Kirlin, in Reform of Metropolitan Governments, Vol. I, ed., Lowdon Wingo (Baltimore: The Johns Hopkins Press, 1972).

"After Suburbia, What? The New Communities Movement in Los Angeles," with James Lamare, in Los Angeles: Viability and Prospects for Metropolitan Leadership, ed., Werner Z. Hirsch (New York: Praeger, 1971).

"International Urban Research," in Toward a National Urban Policy, ed., Daniel Moynihan (New York: Basic Books, 1970).

"Sound and Fury Signifying Nothing? Community Power in Latin America," Urban Affairs Quarterly (March, 1968).

"Urban and Political Development in Latin America," in Comparative Urban Research: The Administration and Politics of Cities, ed., Robert Daland (Beverly Hills: Sage Publications, 1969). A fuller version is in Comparative Administration Group Occasional Papers (October, 1967).

"Politics, Personality, and Planning," Public Administration Review (March, 1967).

"The Organization of Planning in Local Government," with J. S. Pottinger, Jr., Journal of the American Institute of Planners (November, 1966).

"The Relevance of Domestic Urban Studies to International Urban Research," with Robert Gutman, Urban Affairs Quarterly (June, 1966).

REPORTS TO PUBLIC AGENCIES AND COMMISSIONS

Co-Director, with Mary C. Comerio, of the team that produced The Impact of Housing Loss in the NorthridgeEarthquake on Low Income Tenants, prepared for The James Irvine Foundation, November, 1996.

Co-Director, with Mary C. Comerio, of the team that produced The Impact of Housing Losses in the Northridge Earthquake: Recovery and Reconstruction Issues, prepared for the National Science Foundation, August, 1996.
Co-Director, with Patrick Boxall ofThe Urban Institute, of the team that produced Impacts of Disaster on Low-Income Rental Housing: Insights from the Northridge Earthquake, August 1996.

Project Manager of the team that produced the Santa Monica Bay Restoration Project Management Assessment. July, 1993.

Project Director of the team that produced County of Los Angeles "MBE/WBE Predicate Study", September, 1992 (results and 9 volumes of Techical Appendices).

Project Director of the team that produced A Focussed Evaluation of the Costs, Impacts and Alternatives to Retrofitting Sprinklers in High Rise Residential Buildings. Report to City of Los Angeles, July, 1992.

Project Manager of the team that produced for the Air Quality Management District, The SCAQMD Hearing Board: Findings, Analyses, and Recommendations, February, 1991.

Project Manager of the team that produced The Changing Face of Misery: Los Angeles' Skid Row Area in Transition. 3 Volumes (I: The Size and Demography of the Population; II: Social Services III: Shelter Resources) July, 1987.

Project Manager of the team that produced the 1984 Los Angeles Rental Housing Study. 5 Volumes (with A. Schnare, of The Urban Institute, and M. Tietz) March, 1985. Also, Project Director for the 1988 and 1994 studies.

Office Development in Santa Monica: The Municipal Fiscal and Housing Impact, with C. M. Dennis, prepared for the City of Santa Monica, December, 1982.

California Development Fee Policies, prepared for the City of Santa Monica, March, 1982.

Co-Director of the team that produced Desegregating the Los Angeles Unified School District: First Simulation Series, Nov., 1979 and Second Simulation Series, (Feb., 1980).

Deputy Director of the Commission that produced Righting the Liability Balance: Report of the California Citizens' Commission on Tort Reform, Los

Angeles: September, 1977. Also editor and author, with Edward K. Hamilton and staff, of six staff studies on General Personal and Property Liability (Sept., 1977), Auto Liability (Sept., 1977), Product Liability (Sept., 1977), Workers' Compensation (Sept., 1977), Professional Liability (Feb., 1979), and Government Liability (June, 1977).

Deputy Director of the Commission that produced To Serve Seven Million: Report of the Public Commission on Los Angeles County Government, Los Angeles: February, 1976. Also co-author (with Edward K. Hamilton) of four published staff studies examining Central Executive Structure and Decision Making Processes of Los Angeles County Government, the Los Angeles County Road Department, the Los Angeles County Department of Health Services, the Principal Law Enforcement Agencies of Los Angeles County.

"The Role of the Department of Housing and Urban Development in Suburban and Metropolitan Growth," Subcommittee on Housing Papers, Vol. 2, Committee on Banking and Currency, U.S. House of Representatives, 92nd Congress, 1st Session, (Washington, D.C., June, 1971).

"The Political Feasibility of Areawide Planning in Mexico City," Programs for Urban Development in Latin America (Washington, D.C.: Agency for International Development, 1965).

"The Feasibility of Planning on a Metropolitan Level," The Effectiveness of Metropolitan Planning (Washington, D.C.: Senate Committee on Government Operations, 88th Congress, 1964).

TESTIMONY IN THE LAST FOUR YEARS

- Rohn Industries, Inc. et al v Platinum Equity LLC and P Frank LLC, ca No. 03C-04-134-SCD (Del Super.), Deposition, September, 2004.
- In Re: Pittsburgh Corning Corporation, Debtor, in the United States Bankruptcy Court, Western District of Pennsylvania. Trial Testimony, 2004.
- In Re: Mid-Valley Inc., DII Industries, Kellogg, Brown & Root, Inc., KBR Technical Services, Inc., Kellogg, Brown & Root Engineering Corporation, Kellogg, Brown & Root International Inc., and BPM Minerals LLC, in the United States Bankruptcy Court, Western District of Pennsylvania. Trial Testimony, 2004.
- Kelly-Moore Paint Company Inc. vs. Union Carbide Corporation,

District Court of Bazoria County Texas. Deposition, 2004.

- In re: Western Asbestos Company, Western MacArthur Company and MacArthur Company Debtors, United States Bankruptcy Court, Northern District of California, Oakland Division. Deposition and trial testimony, 2003.

- Robert A. Falise, Louis Klein, Jr., Frank Macchiarola, Christian E. Markey, Jr. as Trustees, the Manville Personal Injury Settlement Trust vs. The American Tobacco Company, R.J. Reynolds Tobacco Company, B.A.T. Industries, PLC, Brown and Williamson Tobacco Corporation, Philip Morris Incorporated, Liggett Group Inc., Lorillard Tobacco Company, United States District Court, Eastern District Court of New York. Deposition, 2000.

PERSONAL DATA

Born in New York City, January 16, 1941.

BUSINESS ADDRESSES

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Carmel, California 93923
Telephone: (831) 626-1350
e-mail: frabinov@aol.com
website: www.hra-inc.com

CLERK, U.S. BANKRUPTCY COURT
DISTRICT OF OREGON

MAR - 4 2005

LODGED_____REC'D_____
PAID_____DOCKETED_____

UNITED STATES BANKRUPTCY COURT
DISTRICT OF OREGON

In re Roman Catholic Archbishop of Portland) in Oregon, and Successors, a corporation) sole, dba The Archdiocese of Portland) in Oregon,	Case No. 04-37154-elp11	
Debtor(s)	) RULE 2014 VERIFIED STATEMENT) FOR PROPOSED PROFESSIONAL) (Hamilton, Rabinovitz & Alschuler, Inc.)	

1. The applicant is not a creditor of the debtor except:

   None.

2. The applicant is not an equity security holder of the debtor.

3. The applicant is not a relative of the individual debtor.

4. The applicant is not a relative of a general partner of the debtor (whether the debtor is an individual, corporation, or partnership).

5. The applicant is not a partnership in which the debtor (as an individual, corporation, or partnership) is a general partner.

6. The applicant is not a general partner of the debtor (whether debtor is an individual, corporation, or partnership).

7. The applicant is not a corporation of which the debtor is a director, officer, or person in control.

8. The applicant is not and was not, within two years before the date of the filing of the petition, a director, officer, or employee of the debtor.

9. The applicant is not a person in control of the debtor.

10. The applicant is not a relative of a director, officer or person in control of the debtor.

11. The applicant is not the managing agent of the debtor.

12. The applicant is not and was not an investment banker for any outstanding security of the debtor; has not been, within three years before the date of the filing of the petition, an investment banker for a security of the debtor, or an attorney for such an investment banker in connection with the offer, sale, or issuance of a security of the debtor; and is not and was not, within two years before the date of the filing of the petition, a director, officer, or employee of such an investment banker.

13. The applicant has read 11 U.S.C. §101(14) and §327, and FRBP 2014(a); and the applicant's firm has no connections with the debtor(s), creditors, any party in interest, their respective attorneys and accountants, the United States Trustee, or any person employed in the office of the United States Trustee, or any District of Oregon Bankruptcy Judge, except as follows: None. The names searched by applicant to identify any such connection are set forth in the attached Exhibit A.

14. The applicant has no interest materially adverse to the interest of the estate or of any class of creditors or equity security holders.

15. Describe details of all payments made to you by either the debtor or a third party for any services rendered on the debtor's behalf within a year prior to filing of this case: None.

16. The debtor has the following affiliates (as defined by 11 U.S.C. §101(2)). Please list and explain the relationship between the debtor and the affiliate:
Based on information contained in Rule 2014 Verified Statements filed by Debtor's professionals, the applicant discloses as follows:

Catholic Charities
Members. There are 7 members: the Archbishop (in his individual capacity); 3 lay people, and 3 clergy. Members are appointed by the Archbishop (in his individual capacity), but only a majority of all members can remove a Member.
Directors. The directors consist of (1) each Member; (2) the chair of the board of each member agency of Catholic Charities; and (3) 29 elected directors, elected by the Members.
Operations. The Archbishop is not involved in the day-to-day operations of the corporation.

Oregon Catholic Press
Members. None.
Directors: From 5 to 12 all appointed by the President/Publisher in Chief, who is the Archbishop (in his individual capacity).
Operations. The Archbishop is not involved in the day-to-day operations of the corporation.

St. Mary's Home
Member. One Member, the Debtor as corporation sole.
Directors. The Member appoints 25 % of the Directors; and the Board of Directors elects the remaining Directors. Operations. The Member has certain underlying authority but is not involved in the day to day operations of the corporation.

Village Enterprises
Member. One Member, the Debtor as corporation sole.
Directors: From 3 to 13, all appointed by the Member. The Board of Directors presents a list of nominees to the Member, who elects from this list or from others not on the list.
Operations: The Member has certain underlying authority but is not involved in the day to day operations of the corporation.

17. The applicant is not an affiliate of the debtor.

18. Assuming any affiliate of the debtor is the debtor for purposes of statements 4-13, the statements continue to be true except (list all circumstances under which proposed counsel or counsel's law firm has represented any affiliate during the past 18 months; any position other than legal counsel which proposed counsel holds in either the affiliate, including corporate officer, director, or employee; and any amount owed by the affiliate to proposed counsel or its law firm at the time of filing, and amounts paid within 18 months before filing): None.

19. The applicant hereby acknowledges that he/she has a duty during the progress of the case to keep the court informed of any change in the statement of facts which appear in this verified statement. In the event that any such changes occur, the applicant immediately shall file with the court a pleading to which the original verified statement filed with the court is attached and which describes, by statement paragraph, those changes which have occurred.

THE FOLLOWING QUESTIONS NEED BE ANSWERED ONLY IF AFFILIATES HAVE BEEN LISTED IN STATEMENT 16.

20. List the name of any affiliate which has ever filed bankruptcy, the filing date, and court where filed:
Based on information contained in Rule 2014 Verified Statements filed by Debtor's professionals, none.

21. List the names of any affiliates which have guaranteed debt of the debtor or whose debt the debtor has guaranteed. Also include the amount of the guarantee, the date of the guarantee, and whether any security interest was given to secure the guarantee. Only name those guarantees now outstanding or outstanding within the last 18 months.
Based on information contained in Rule 2014 Verified Statements filed by Debtor's professionals, applicant discloses as follows:

The Debtor is the sole member of Village Enterprises, an Oregon non-profit corporation. Village Enterprises owes Key Bank approximately $6,000,000 under a debt reimbursement agreement dated April 1, 2002. The Debtor has guaranteed repayment thereof by an unlimited guaranty dated the same day.

Village Enterprises in turn also is the sole member of Assumption Village, LLC and Trinity Court, LLC, both Oregon limited liability companies.

Assumption Village, LLC owes Key Bank approximately $13,100,000 under a debt reimbursement agreement dated March 1, 2001. The Debtor has guaranteed repayment thereof by an unlimited guaranty dated the same day.

Trinity Court, LLC owes Key Bank approximately $3,200,000 under a debt reimbursement agreement dated June 1, 2001. The Debtor has guaranteed repayment thereof by an unlimited guaranty dated the same day.

None of these unlimited guaranties of the Debtor is secured by any assets of the Debtor. The Debtor believes that the security provided by the respective borrowers to Key Bank is sufficient to pay those obligations.

22. List the names of any affiliates which have a debtor-creditor relationship with the debtor. Also include the amount and date of the loan, the amount of any repayments on the loan and the security, if any. Only name those loans now outstanding or paid off within the last 18 months:
Based on information contained in Rule 2014 Verified Statements filed by Debtor's professionals, none.

23. List any security interest in any property granted by the debtor to secure any debts of any affiliate not covered in statements 20 and 21. List any security interest in any property granted by the affiliate to secure any debts of the debtor not covered in statements 21 and 22. Also include the collateral, the date and nature of the security interest, the name of the creditor to whom it was granted, and the current balance of the underlying debt:
Based on information contained in Rule 2014 Verified Statements filed by Debtor's professionals, none.

24. List the name of any affiliate who is potentially a "responsible party" for unpaid taxes of the debtor under 26 U.S.C. §6672:
Based on information contained in Rule 2014 Verified Statements filed by Debtor's professionals, none.

I verify that the above statements are true to the extent of my present knowledge and belief.

Francine F Rabinovitz

Francine F. Rabinovitz, Ph.D. Applicant
Executive Vice-President

The foregoing is substantially a true and exact computer generated copy of LBF 1114 (10/13/00)

EXHIBIT A

Debtor and Related Entities[1]
Roman Catholic Archbishop of Portland in Oregon and Successors, a corporation sole
Archdiocese of Portland Oregon
Catholic Charities
Oregon Catholic Press
St. Mary's Home
Village Enterprises
Assumption Village, LLC
Trinity Court, LLC

Director of the Debtor
John Vlazny

Counsel to the Debtor
Miller Nash LLP
Schwabe Williamson & Wyatt
Sussman Shank LLP

Advisors to the Debtor
Rothgerber Johnson & Lyons LLP
McGovern, Kevin
Mesirow Financial Consulting LLC

Advisors to other parties-in-interest
Barton & Strever PC
Conte, Jon, R
Gatti, Gatti, Maier, Krueger Sayer & Associates
Hamilton, Marci
O'Donnell & Clark LLP
Tonkon Torp LLP

Creditors of the Debtor
A G Y c/o Kelly Clark
ABC Fire Extinguisher
Abott Lind Inc.
Adolphs's Flowers
Allen's Press Clipping Bureau
Allied Irish Bank
Alsco
American Payroll Association
Aramark
Arthur J Gallagher & Co FIIC
AT&T Quarterly
B M L c/o Bradley O Baker
B V c/o Daniel J Gatti, Gatti, Gatti, Maier, Krueger, Sayer & Associates
Barton-Cotton, Inc.
Black and Indian Mission Office

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[1] The Debtor believes it does not have any affiliates as defined in Section 101(2) of the Bankruptcy Code.

Creditors of the Debtor (continued)
Bob Nagel Distributing
C B c/o William A Barton
Caldwell Report
Cameo Garrett
Castricano, Kathie
Cathedral Parish
Catholic Sentinel
Cedar Mill Lunber & Hardware
Center for Ministry Development
Centric Elevator Corporation of Oregon
Charles Naylor c/o Daniel Gatti Gatti Gatti Maier Krueger Sayer & Associates
Ciffonem Rev. Mr. Don
Cloudburst Recycling
Cornelius Dental Clinic
Cracker Box Deli
Curtis Grecco c/o Daniel J Gatti Gatti Gatti Maier Krueger Sayer & Associates
D C c/o David L. Slader
D M c/o Kelly Clark
D S c/o Daniel J Gatti Gatti Gatti Maier Krueger Sayer & Associates
D.S c/o Slader
Dave Partlow
David Coombs c/o Michael Morey
David Sorensen
Department of Consumer & Business
Diocese of San Diego
Don Slaney c/o Gary A. Bisaccio
Dorothy Coughlin
Douglas De Jong c/o Daniel J Gatti Gatti Gatti Maier Krueger Sayer & Associates
Earl New c/o Daniel J Gatti Gatti Gatti Maier Krueger Sayer & Associates
Emmohns Enterprises, Inc.
First Call Heating & Cooling
G G c/o Michael Morey
G M c/o David L Slader
G P c/o David L. Slader
G P c/o Michael Morey
Gertrude Welsh Productions
Greg Farris c/o Gary A Bisaccio
H S c/o Kelly Clark
H S2 c/o David L. Slader
Hahn & Associates Inc
Hilton Garden Inn Corvallis
Holy Family Catholic Church
Inter Varsity Press
J C c/o Randall Wolfe
J C M c/o Kelly Clark O'Donnell & Clark LLP
J D c/o David Slader
J Doe 12 c/o Kelly Clark O'Donnell & Clark LLP
J.S. c/o Bisaccio
James Clarizio c/o Michael Morey
James LaFortune
Jay Searles
John Doe 104 c/o Kevin Strever
John Doe 105 c/o Kevin Strever
John Smith c/o Kelly Clark O'Donnell & Clark LLP
John V Doe c/o William A. Barton
Joseph Chestnut c/o David L. Slader

Creditors of the Debtor (continued)

K N c/o David L Slader
Kaufer's Religious Supplies
Key Bank of Oregon
L D c/o J William Savage Rieke & Savage PC
Les Schwab
Liturgy Training Publications
M F c/o Kelly Clark O'Donnell & Clark LLP
M J D c/o David L. Slader
M Lee Smith Publishers LLC
M M c/o Kelly Clark O'Donnell & Clark LLP
M S c/o Gary A. Bisaccio
M Y c/o David L. Slader
Mathis & Donheiser
Matthews International
Mexican American Cultural Center
Michael Gerard Archambo c/o Kathleen Fre
Michael Morey c/o Michael Bloom
Mobile West
N.C.C In Pro Per
Nathan Dufresne c/o Karl Mullen
National Association of Pastoral Musicians
National Federation for Catholic Youth Mini
National Notary Association
New perspective Center
Newman Foundation of OSU, Inc.
Norman L Klettke, Jr. c/o Daniel J. Gatti
Office Products Northwest
Oregon Education Technology Consortium
Oregon State University
Our Lady of Sorrows Catholic Church
P C c/o Scott Beckstead
Patrick Brennan
PBS Engineering
PGE
Pitney Bowes
Pontifical No. Amer. College
Portland State Book Store
Pro Landscape, Inc
Progressive Business Publications
Qwest
R E C c/o Kelly Clark
R W F c/o David L. Slader
Randy Sloan c/o Daniel J. Gatti
Rev Wayne Forbes
Robert David Paul, Jr. c/o Ganiel J. Gatti
Rodney Kessler c/o Daniel J Gatti Gatti Gatti Maier Krueger Sayer & Associates
S E c/o Michael Morey
S L c/o David L. Slader
S N B c/o Kelly Clark
S W c/o David L. Slader
Sacred Heart Catholic Church
SAGE
Sanderson Safety Supply Co
Sherri Ervin
Sign Wizards
Sitnick, Stan

Creditors of the Debtor (continued)
Society for Human Resource Management
Sound Security Inc., dba Sonitrol Pacific
St Charles Borromeo Church
St Helen's Catholic Church
St John Fisher Catholic Church
St Joseph School
St Joseph's Catholic Church
St. Catherine of Siena Church
St. Michael Parish
Star of the Sea Catholic Church
State Departement of Oregon-Emp
Steven Colvin c/o Daniel J. Gatti
Stevens-Ness
Teresa Seeley
Teufel Nursery, Inc.
Umpqua Bank
Union 76
United Pipe & Supply Co
Vantage Productions Corporation
W.B c/o Bisaccio
Washington County Drop Box
William Boaz
Yturri Rose LLP

Below is an order of the Court.

Elizabeth L. Perris
United States Bankruptcy Judge

CLERK U.S. BANKRUPTCY COURT
DISTRICT OF OREGON

MAR 9 2005

LODGED _____ REC'D _____
PAID _____ DOCKETED _____

UNITED STATES BANKRUPTCY COURT

DISTRICT OF OREGON

In re Roman Catholic Archbishop of Portland in Oregon, and successors, a corporation sole, Debtor.	Case No. 04-37154-elp11 Chapter 11 ORDER APPOINTING FUTURE CLAIMS EVALUATION CONSULTANT AS INDEPENDENT EXPERT (Hamilton, Rabinovitz & Alschuler, Inc.)

This matter came before the Court on the Joint Application to Appoint Future Claims Evaluation Consultant as Independent Expert (Hamilton, Rabinovitz & Alschuler, Inc.), filed by or on behalf of David A. Foraker, the Future Claimants Representative in this case (the "FCR"), Roman Catholic Archbishop of Portland in Oregon, and successors, a corporation sole (the "Debtor"), and the Tort Claimants Committee (the "Committee", and together with the FCR and the Debtor, "Applicants"). Based on the Joint Application and the Rule 2014 Verified Statement for Proposed Professional filed therewith on behalf of Hamilton, Rabinovitz & Alschuler, Inc. ("HR&A"), it is hereby

ORDERED as follows:

1. HR&A is appointed as an independent expert for purposes of (i)

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developing, in consultation with Applicants, a data base and analytical models for use in estimating and valuing the "future" claims of the Future Claimants (as defined in this Court's December 20, 2004, Order Appointing Future Claimants Representative), (ii) consulting with Applicants with regard to the design of a tort claims resolution facility and (iii) giving expert testimony, as necessary.

2. Compensation and reimbursement of expenses shall be awarded and paid as an administrative expense under sections 503(b) and 507(a)(1) of the Bankruptcy Code in the same manner as other professionals that are employed at the expense of the estate and in accordance with fee procedures orders in effect from time to time; provided, however, that compensation shall be limited to $100,000 unless such limitation is increased by further order of this Court on an application that is filed before services resulting in billings in excess of such limitation are provided.

3. This Order shall be effective as of March 4, 2005.

####

Presented by:

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Attorneys for Future Claimants Representative

cc: List of Interested Parties

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