## UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW MEXICO

Chapter 11
Case No. 13-13676-t11
Jointly Administered with:
Case No. 13-13677-t11

# NOTICE OF DISCLOSING PROFESSIONAL FEES AND EXPENSES FOR THE PERIOD OF OCTOBER 1, 2014 THROUGH DECEMBER 31, 2014

#### TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

The Roman Catholic Church of the Diocese of Gallup ("RCCDG") and the Bishop of the Roman Catholic Church of the Diocese of Gallup (the "Arizona Entity," and together with RCCDG, the "Debtors"), the debtors and debtors-in-possession in the above-captioned, jointly administered cases (the "Reorganization Cases"), hereby file this notice to disclose the professional fees and expenses incurred from October 1, 2014 through December 31, 2014, pursuant to the "Stipulated Order Regarding Interim Applications for Payment of Professional Compensation and Reimbursement of Expenses" [Dkt. No. 307], for the following professionals: Quarles & Brady LLP; Keegan, Linscott & Kenon, P.C.; Stelzner, Winter, Warburton, Flores, Sanchez & Dawes, P.A.; and Insurance Archaeology Group.

## I. QUARLES & BRADY LLP

Quarles & Brady LLP ("Q&B") was retained pursuant to the "Order Authorizing Employment of Quarles & Brady LLP as General Reorganization and Restructuring Counsel for the Debtor and Debtor-in-Possession" [Dkt. No. 143].

### A. Fees and Expenses Previously Requested.

Pursuant to Q&B's "<u>First Interim Application for Allowance and Payment of Professional Compensation and Reimbursement of Expenses by Quarles & Brady LLP</u>" [Dkt. No. 231] and "<u>Notice of Disclosing Professional Fees and Expenses for the Period of April 1, 2014 through September 30, 2014</u>" [Dkt. No. 326] (the "**First Disclosure**"), the fees and expenses previously requested totaled \$840,605.00 and \$62,167.10, respectively, for a total amount of \$902,772.10.

## B. Fees and Expenses Incurred from October 1, 2014 through December 31, 2014.

The fees and expenses incurred through this quarter are \$226,637.50 and \$188.46, respectively, for a total amount of \$226,825.96.

C. Fees Incurred by Task Category from October 1, 2014 through December 31, 2014.

Task	Task Description		<b>Amount Billed</b>	
Code				
B110	Case Administration	\$	29,202.50	
B115	Schedules and Statements	\$	362.50	
B120	Asset Analysis/Recovery	\$	80,980.00	
B130	Asset Disposition	\$	1,857.50	
B150	Meetings/Communications with Creditors	\$	5,450.00	
B160	Fee/Employment Applications	\$	12,612.50	
B170	Fee/Employment Objections	\$	0.00	
B210	Business Operations	\$	2,025.00	
B310	Claims Administration/Objections	\$	33,685.00	
B320	Plan and Disclosure Statement	\$	19,637.50	
DISC	Discovery	\$	37,137.50	
VAL	Valuation	\$	3,687.50	
	TOTAL	\$	226,637.50	

### D. Payment(s) Received from Debtors to Date.

To date, Q&B has received no payments from the Debtors.

#### II. KEEGAN, LINSCOTT & KENON, P.C.

Keegan, Linscott & Kenon, P.C. ("**KLK**") was retained pursuant to the "Order Authorizing Employment of Keegan, Linscott & Kenon, P.C. as Accountant and Financial Consultant for the Debtor and Debtor-in-Possession" [Dkt. No. 144].

#### A. Fees and Expenses Previously Requested.

Pursuant to KLK's "First Interim Application for Allowance and Payment of Professional Compensation and Reimbursement of Expenses by Keegan, Linscott & Kenon, P.C. as Accountant and Financial Consultant for the Debtors and Debtors-in-Possession" [Dkt. No. 232] and the First Disclosure, the fees and expenses previously requested totaled \$232,849.75 and \$5,100.72, respectively, for a total amount of \$237,950.47.

## B. Fees and Expenses Incurred from October 1, 2014 through December 31, 2014.

The fees and expenses incurred through this quarter are \$38,384.50 and \$758.44, respectively, for a total amount of \$39,142.94.

# C. Fees Incurred by Task Category from October 1, 2014 through December 31, 2014.

Task Description	Amount Billed		
Accounting/Auditing	\$ 5,620.00		
Business Analysis	\$ 117.50		
Business Operations	\$ 22,666.25		
Case Administration	\$ 6,187.50		
Data Analysis	\$ 799.00		
Fee Application	\$ 94.00		
Report Review	\$ 94.00		
Special Project	\$ 31.25		
Travel	\$ 2,775.00		
TOTAL	\$ 38,384.50		

### D. Payment(s) Received from Debtors to Date.

To date, KLK has received no payments from the Debtors.

## III. STELZNER, WINTER, WARBURTON, FLORES, SANCHEZ & DAWES, P.A.

Stelzner, Winter, Warburton, Flores, Sanchez, & Dawes, P.A. ("Stelzner") was retained as RCCDG's special counsel pursuant to the "Order Authorizing Employment of Stelzner, Winter, Warburton, Flores, Sanchez & Dawes, P.A. as Special Counsel for the Debtor and Debtor-in-Possession" [Dkt. No. 145].

#### A. Fees and Expenses Previously Requested.

Pursuant to Stelzner's "First Interim Application for Allowance and Payment of Professional Compensation and Reimbursement of Expenses by Stelzner, Winter, Warburton, Flores, Sanchez & Dawes, P.A. as Special Counsel for the Debtor and Debtor-in-Possession" [Dkt. No. 230] and the First Disclosure, the fees and expenses previously requested totaled \$8,389.36 and \$469.09, respectively and including gross receipts taxes, for a total amount of \$8,858.45.

### B. Fees and Expenses Incurred from October 1, 2014 through December 31, 2014.

The fees and expenses incurred through this quarter are \$895.60 and \$0.00, respectively and including gross receipts taxes, for a total amount of \$895.60.

#### C. Payment(s) Received from Debtors to Date.

To date, Stelzner has received no payments from the Debtors.

#### IV. INSURANCE ARCHAEOLOGY GROUP

Insurance Archaeology Group ("IAG") was retained as Debtors' insurance archaeologist pursuant to the "Order Authorizing the Employment of Insurance Archaeology Group as Insurance Archaeologist for the Debtor and Debtor-in-Possession" [Dkt. No. 226].

## A. Fees and Expenses Previously Requested.

Pursuant to the First Disclosure, the fees and expenses previously requested by IAG totaled \$43,297.50 and \$3,135.70, respectively and including gross tax receipts, for a total amount of \$46,433.20.

## B. Fees and Expenses Incurred from October 1, 2014 through December 31, 2014.

IAG has incurred no fees and expenses through this quarter.

## C. Payment(s) Received from Debtors to Date.

IAG has received \$46,433.20 in payments from the Debtors.

RESPECTFULLY SUBMITTED this 30th day of January, 2015.

#### /s/ Elizabeth S. Fella

Susan G. Boswell (AZ Bar No. 004791) Lori L. Winkelman (AZ Bar No. 021400) Elizabeth S. Fella (AZ Bar No. 025236) Admitted Pro Hac Vice **OUARLES & BRADY LLP** One S. Church Ave., Suite 1700 Tucson, Arizona 85701 (520) 770-8700/Fax: (520) 623-2418 susan.boswell@quarles.com lori.winkelman@quarles.com elizabeth.fella@quarles.com -and-Thomas D. Walker WALKER & ASSOCIATES, P.C. 500 Marquette N.W., Suite 650 Albuquerque, New Mexico 87102 (505) 766-9272/Fax: (505) 722-9287 twalker@walkerlawpc.com

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#### **CERTIFICATE OF SERVICE**

Pursuant to F.R.C.P. 5(b)(3), F.R.B.P. 9036 and NM LBR 9036-1(b), I hereby certify that service of the foregoing "Notice of Disclosing Professional Fees and Expenses For The Period of October 1, 2014 Through December 31, 2014" was made on January 30, 2015 via e-mail and the notice transmission facilities of the Bankruptcy Court's case management and electronic filing system on the below listed parties, and via U.S. Mail to all additional parties on the Debtors' Limited Notice List.

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> /s/ Elizabeth S. Fella Elizabeth S. Fella