

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW MEXICO**

In re:

ROMAN CATHOLIC CHURCH OF THE
DIOCESE OF GALLUP, a New Mexico
corporation sole,

Debtor.

Chapter 11

Case No. 13-13676-t11

**NOTICE OF OBJECTION DEADLINE FOR THE DEBTOR'S APPLICATION FOR AN
ORDER AUTHORIZING THE EMPLOYMENT OF KEEGAN, LINSKOTT & KENON,
P.C. AS ACCOUNTANT AND FINANCIAL CONSULTANT**

On November 12, 2013, the Roman Catholic Church of the Diocese of Gallup (“**RCCDG**” or “**Debtor**”) filed the “Application for an Order Authorizing the Employment of Keegan, Linscott & Kenon, P.C. as Accountant and Financial Consultant for the Debtor and Debtor-in-Possession” (the “**Application**”) in which RCCDG requests Court approval of employment of Keegan, Linscott & Kenon, P.C. (“**KLK**”) to provide accounting and financial services to the Debtor and debtor-in-possession in the above-captioned Chapter 11 reorganization case (the “**Reorganization Case**”). KLK has filed a verified disclosure pursuant to Bankruptcy Rules 2014 and 2016 (the “**Linscott Statement**”). The Application and Linscott Statement may be viewed for a per page fee via the PACER (Public Access to Electronic Court Records) system. Log on to PACER at ecf.nmb.uscourts.gov. For registration and use instructions, see pacer.psc.uscourts.gov/index.html. You may also view this document at no charge from a computer at the Office of the Clerk of the United States Bankruptcy Court between 8:30 a.m. and 4:30 p.m., Monday through Friday, at the Federal Building and United States Courthouse, 500 Gold Ave., S.W., Tenth Floor, Albuquerque, New Mexico 87102.

The Application requests authority for RCCDG to employ KLK, and to pay KLK monthly, upon receipt of KLK’s billing statements and prior to the Court’s allowance of KLK’s fees and costs, 75% of billed fees, 100% of billed costs and 100% of gross receipts tax on fees and costs that RCCDG is authorized to pay, to be paid from funds of the estate. If the Application is approved, the rate structure agreed upon for this matter will be as follows: Partner/Director: \$235; Manager: \$130; Supervisor: \$125; Senior: \$100; Associate: \$60; Administrative: \$35. KLK will itemize costs; applicable gross receipts tax will be added to fees and costs; statements to RCCDG will be rendered monthly. All amounts paid by RCCDG to KLK would be subject to ultimate approval of the Bankruptcy Court under Bankruptcy Code §§ 328, 330 and 331. RCCDG requests that KLK’s employment be made effective as of November 12, 2013.

Any party who objects to the Application must file its objection with the Clerk of the United States Bankruptcy Court for the District of New Mexico within 21 days after the date of mailing of this notice, plus three days due to service of this Notice by mail, and serve a copy of the objection on Susan G. Boswell at the address given below. Objections must be filed electronically to the extent required by New Mexico Local Bankruptcy Rule 5005-4. The

Clerk's address (for use if electronic filing is not required) is Clerk's Office, United States Bankruptcy Court, District of New Mexico, P.O. Box 546, Albuquerque, NM 87103-0546. If any objections are timely filed, a hearing will be held on notice only to Counsel for RCCDG and objecting parties. If no objections are timely filed, an order granting the Application will be presented for entry without a hearing or further notice.

DATED this 13th day of November, 2013.

/s/ Susan G. Boswell

Susan G. Boswell (AZ Bar No. 004791)

Lori L. Winkelman (AZ Bar No. 021400)

Elizabeth S. Fella (AZ Bar No. 025236)

Pro Hac Vices Pending

QUARLES & 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

Proposed Counsel for Debtor

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 Objection Deadline For The Debtor’s Application For An Order Authorizing The Employment Of Keegan, Linscott & Kenon, P.C. As Accountant And Financial Consultant” will be made on November 13, 2013 via e-mail and/or U.S. Mail or via the notice transmission facilities of the Bankruptcy Court’s case management and electronic filing system on the following parties:

U.S. Trustee
P.O. Box 608
Albuquerque, NM 87103
ustpregion20.aq.ecf@usdoj.gov

All Parties Listed on the Master Mailing List
and Confidential Master Mailing List.

/s/ Susan G. Boswell
Susan G. Boswell