

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

<p>In re:</p> <p>ROMAN CATHOLIC CHURCH OF THE DIOCESE OF GALLUP, a New Mexico corporation sole,</p> <p style="text-align: center;">Debtor.</p> <hr/> <p>Jointly Administered with:</p> <p>BISHOP OF THE ROMAN CATHOLIC CHURCH OF THE DIOCESE OF GALLUP, an Arizona corporation sole.</p> <p>This pleading applies to:</p> <p><input checked="" type="checkbox"/> All Debtors. <input type="checkbox"/> Specified Debtor.</p>	<p>Chapter 11</p> <p>Case No. 13-13676-t11</p> <p>Jointly Administered with:</p> <p>Case No. 13-13677-t11</p>
--	--

**MOTION FOR AN ORDER FIXING TIME FOR FILING PROOFS OF CLAIM,
APPROVING CLAIM FORMS, AND APPROVING MANNER AND FORM OF NOTICE**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Roman Catholic Church of the Diocese of Gallup, a New Mexico corporation sole (“**RCCDG**”) and Bishop of the Roman Catholic Church of the Diocese of Gallup, an Arizona corporation sole (the “**Arizona Entity**,” and together with RCCDG, the “**Debtors**”), the debtors and debtors-in-possession in the above-captioned jointly administered Chapter 11 reorganization cases (the “**Reorganization Cases**”), by and through their attorneys undersigned, respectfully request that the Court enter an Order: (i) fixing the time within which proofs of claims against the estates of the Debtors are to be filed in the Reorganization Cases; (ii) approving the form of proof of claim that a Tort Claimant (defined below) would use in filing a claim against either

Debtor;¹ (iii) approving the form of notice for each of RCCDG and the Arizona Entity; and (iv) approving the proposed procedure for giving notice of the bar date proposed by the Debtors. Under the circumstances of the Reorganization Cases, it is necessary and appropriate for the Court to set a bar date for proofs of claim. The Debtors propose the date that is one hundred and twenty (120) days after service of the notices of the claims bar date as ordered by the Court as the appropriate bar date under the circumstances of the Reorganization Cases (the “**Claims Bar Date**”).² In addition, the Debtors propose that they be ordered to send such notices no later than ten (10) days after entry of the order approving the Motion. As set forth herein, the Debtors intend to give a very broad notice of the Claims Bar Date in an effort to provide a wide-ranging notice designed to try and reach as many Tort Claimants (defined below) as possible.

To give notice of the Claims Bar Date to the Tort Claimants (defined below), RCCDG and the Arizona Entity propose to mail the following to their respective Confidential Master Mailing Lists:

1. The Tort Claim Form (**Exhibit “A”** hereto)

¹ Although the above-captioned Reorganization Cases are being jointly administered, the Reorganization Cases are not substantively consolidated. However, Tort Claimants are lay people who, in many cases, will be unrepresented. In addition, the typical Tort Claimant would not know of or appreciate the civil law distinctions of two corporate entities and likely only knows these Debtors as the Diocese of Gallup. Therefore, the Debtors are requesting that Tort Claimants (but not general creditors) file a single proof of claim in the jointly administered case number in the form attached as Exhibit “A” and while the Tort Claim Form allows for a claimant to check which Debtor the claim is against, the failure to check the box or checking both boxes will not solely be a basis for objection or disallowance of a Tort Claim.

² To the extent certain Tort Claimants (defined below) may not be aware prior to passage of the Claims Bar Date that they may have a claim against the Debtors such that the applicable state statute of limitations may not have expired as to that particular Tort Claimant (“**Future Tort Claimant**”), the Debtors intend to seek appointment of a Future Claims Representative who will, among other things, file a proof of claim on behalf of the Future Tort Claimants. The Debtors will also be seeking appointment of a guardian ad litem to represent the interests of any potential Tort Claimants who are currently minors.

2. Notice and Instructions of Confidential Claims Bar Date (**Exhibit “B”** hereto).

To give notice of the Claims Bar Date to all other claimants, RCCDG and the Arizona Entity propose to mail the following to their respective Master Mailing Lists:

1. Arizona Entity Other Claims Form (**Exhibit “C”** hereto)
2. Arizona Entity Notice of Claims Bar Date (**Exhibit “D”** hereto)
3. RCCDG Other Claims Form (**Exhibit “E”** hereto)
4. RCCDG Notice of Claims Bar Date (**Exhibit “F”** hereto)
5. RCCDG Notice of Disputed, Contingent, or Unliquidated Claim (if applicable) (**Exhibit “G”** hereto).³

Additionally, the Debtors propose to give notice by posting a court-approved notice in the form of **Exhibit “H”** hereto (the “**Posted Notice**”) in all missions and parishes within the geographic area of the Diocese of Gallup (“**Diocese**”), and by requesting that the Dioceses of Phoenix, Santa Fe, and Las Cruces request that the missions and parishes within the geographic area of the these respective dioceses and archdiocese post the Posted Notice. Additionally, the Debtors propose to request that all Navajo Chapter Houses and the public places listed on **Exhibit “I”** hereto post the Posted Notice. The Debtors will also request that the Posted Notice be published in certain newspapers by paid ads, that a Press Release (as defined below) be read as a public service announcement in other publications and that a Press Release (defined below) be read as radio announcements (paid and/or free as public service announcements) as set forth in Exhibit “I”. The Debtors will also publish all pleadings and exhibits related to this Motion on their website, and the Debtors are informed and believe that the Official Committee of

³ The Arizona Entity has not proposed a form of Notice of Disputed, Contingent, or Unliquidated Claim because it has not scheduled any non-confidential claims against it and does not believe that any exist.

Unsecured Creditors (“the **Committee**”) will have a toll free number available for creditors to call.

This Motion presents a “core proceeding” over which the Court has jurisdiction to enter a final order under 28 U.S.C. §§ 157 (A) & (B), and 1334. The statutory predicates of this Motion are 11 U.S.C. §§ 501 and 502, proceedings on which are governed by Bankruptcy Rule 3003 and 2002.

This Motion is supported by: (i) the following Memorandum of Points and Authorities; (ii) the exhibits to this Motion; (iii) the “Declaration of Bishop James S. Wall in Support of Chapter 11 Petition and First Day Motions” (the **“Wall Declaration”**) [Dkt. No. 19], which was filed with the Court on November 12, 2013; and (iv) the entire record before the Court in these Reorganization Cases.

RESPECTFULLY SUBMITTED this 6th day of March, 2014.

/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)

Admitted Pro Hac Vice

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

Counsel for the Debtors

MEMORANDUM OF POINTS AND AUTHORITIES

On November 12, 2013 (the “**Petition Date**”), the Debtors commenced these Reorganization Cases by filing voluntary Chapter 11 petitions. The Debtors have remained debtors-in-possession under 11 U.S.C. §§ 1107 and 1108 since the Petition Date. The Debtors filed the Reorganization Cases in order to reorganize their financial affairs pursuant to a plan of reorganization that will, among other things, fairly, justly and equitably compensate the victims of sexual abuse by clergy or others associated with the Debtors while allowing the Debtors to continue their ministry and mission and attempt to finally bring healing to victims, parishioners and others affected by the past acts of sexual abuse committed by clergy and others.

I. BACKGROUND.

The Civil and Ecclesiastical Entities and Organization of the Entities.

The organization and background of the Debtors, and the relationship among them, the Diocese, the Parishes and various other entities within the geographic territory of the Diocese is described in the Wall Declaration, which is herein incorporated by this reference. Therefore, that history will not be repeated here.

When it was originally created in 1939, the territory of the Diocese included all of San Juan, McKinley, and Catron counties in New Mexico, parts of Rio Arriba, Sandoval, Bernalillo and Valencia counties in New Mexico and all of Mohave, Coconino, Yavapai, Navajo and Apache counties in Arizona. In 1969, the geographic boundaries of the Diocese were changed. Today, the Diocese includes only the geographic area outlined on the map attached to the Wall Declaration as Exhibit “A”, and encompasses approximately 55,468 miles but still includes portions of Arizona and New Mexico.

The Diocese is among the poorest diocese in the United States. There are no large metropolitan areas within the geographic area of the Diocese which includes significantly poor and underdeveloped areas where there is high unemployment and low income. Approximately sixty percent (60%) of the geographic area served by the Diocese is on Native American reservations. In many of the counties located within the geographic area of the Diocese, approximately forty-three percent (43%) of the people live below the poverty level, and the unemployment rate is approximately forty percent (40%) on the Native American reservations. The Diocese is comprised of more Native Americans than any other diocese in the United States. There are seven distinct tribes within the Diocese: the Acoma, Laguna, Zuni (Pueblo Indians), Jicarilla Apache, White Mountain Apache, Hopi, and Navajo. The remainder of the population of the Diocese is divided among approximately thirty (30) nationalities, with the largest ethnic group being Hispanic.

The Need for Reorganization.

As explained in more detail in the Wall Declaration and the motions filed on the Petition Date, RCCDG has either been sued or had claims made against it because of sexual abuse by priests or other workers in the Diocese that primarily occurred in the 1950's and 1960's. At the time the Reorganization Cases were commenced, there were thirteen (13) lawsuits filed which were pending in the Coconino County, Arizona Superior Court. In addition, RCCDG has been made aware of additional claims which either have or will be asserted against RCCDG. Moreover, it is very likely that the universe of claims has not yet been identified or asserted. Accordingly, the Debtors filed these Reorganization Cases to help focus their efforts and limited financial resources to bring healing to those who were abused, parishioners and others affected by the past acts of sexual abuse committed by clergy and others associated with the Diocese or

who ministered within the geographic area of the Diocese and to equitably compensate those who suffered harm. The Debtors seek to accomplish these goals by reorganizing their financial affairs pursuant to a plan of reorganization that will also allow the Diocese to continue its ministry and mission, including providing counseling and other services to those who have been harmed and serving an underserved area and population with needed services.

It is the desire and intent of the Debtors to work in a collaborative and cooperative manner with all constituencies, and it is in everyone's best interests to move the Reorganization Cases expeditiously to conclusion with a minimal amount of litigation. The Debtors will be challenged to pay the costs of administration and their normal operating expenses. The Debtors have attempted to balance the necessity for broad notice with the reality of the financial circumstances of the Debtors. The Debtors submit that the program for giving notice of the Claims Bar Date proposed in this Motion strikes that balance. In addition, the Debtors understand that the Committee agrees that prompt setting of a bar date is appropriate in this case.

II. BAR DATE FOR FILING PROOFS OF CLAIM.

The universe of potential claims against the Debtors includes secured and unsecured claims of trade creditors, vendors and other persons or entities who provide goods or services to the Debtors, and unsecured claims of persons who assert abuse by clergy or other persons within the geographic area of the Diocese ("**Tort Claimants**") for which such Tort Claimants contend the Debtors are liable under various theories (the "**Tort Claims**"). The Tort Claims consist of (i) Tort Claimants who have filed lawsuits against RCCDG, (ii) those who have come forward and informed the Debtors of potential claims but who have not filed any legal actions, (iii) Tort Claimants who settled their Tort Claims prior to the Petition Date but who are, nevertheless, included in the Confidential Master Mailing List in these Reorganization Cases, and (iv) those Tort

Claimants who have never come forward and are not presently known to the Debtors. In order for the Debtors to move forward with a plan of reorganization, it is necessary to determine the universe of claims against the Debtors which requires that the Debtors give potential claimants notice of the process and time for filing their claims.

The Debtors' intent in drafting these forms is to provide notice of the Claims Bar Date while making the claim process as streamlined as possible for the claimants, particularly the Tort Claimants, as described in more detail below. In addition, however, the Debtors seek to elicit sufficient information from the Tort Claimants as set forth in the Tort Claim Form to allow parties in interest, subject to appropriate confidentiality protections, to make an initial assessment regarding the validity of a particular claim, including whether the claim might be time barred. The Debtors have also proposed certain noticing procedures herein that they believe strike a balance between broad notice and reasonable noticing expense, as described in more detail below. The time periods proposed in this Motion allow for sufficient time for Tort Claimants to process the notices, determine to file a claim and to complete and return the claim form. The Debtors have consulted with the Committee on the issue and suggest that the Claims Bar Date proposed strikes that balance. Identifying the Tort Claimants and their claims will aid in attempts to conduct an early but productive mediation, bring the Reorganization Cases to a successful conclusion and preserve estate assets.

III. LEGAL ARGUMENT.

In a Chapter 11 case, a creditor must file a proof of claim (i) if its claim is listed in the debtor's bankruptcy schedules as disputed, contingent, or unliquidated, (ii) if its claim has not been listed at all, or (iii) if it is not satisfied to rely on the amount of its claim as scheduled by the debtor. *See* 11 U.S.C. §§ 1111(a) and 501(a), and Bankruptcy Rule 3003(c).

The Federal Rules of Bankruptcy Procedure (“**Bankruptcy Rules**”) set forth the procedure under which a proof of claim must be filed. Specifically, Bankruptcy Rules 3003(c) and 2002(a)(7) govern the procedure for filing a proof of claim in an Chapter 11 case.

Bankruptcy Rule 3003(c) provides:

- (1) *Who May File.* Any creditor or indenture trustee may file a proof of claim within the time prescribed by subdivision (c)(3) of this rule.
- (2) *Who Must File.* Any creditor or equity security holder whose claim or interest is not scheduled or scheduled as disputed, contingent, or unliquidated shall file a proof of claim or interest within the time prescribed by subdivision (c)(3) of this rule; any creditor who fails to do so shall not be treated as a creditor with respect to such claim for the purposes of voting and distribution.
- (3) *Time for Filing.* The court shall fix and for cause shown may extend the time within which proofs of claim or interest may be filed. Notwithstanding the expiration of such time, a proof of claim may be filed to the extent and under the conditions stated in Rule 3002(c)(2), (c)(3), (c)(4), and (c)(6).

Bankruptcy Rule 3003(c) mandates that the court establish a date by which time unscheduled claims, and those listed as disputed, contingent, or unliquidated, or scheduled in amounts different from that asserted by creditors, must be filed in Chapter 11 cases or their holders will be precluded from participating in the reorganization case. *See also In re Standard Metals, Inc.*, 817 F.2d 625, 630 (10th Cir. 1987). The Bankruptcy Court has the discretion to “fix any period of time which provides creditors or equity security holders a reasonable time for filing.” *In re Thomson McKinnon Securities, Inc.*, 125 B.R. 88, 92 (Bankr. S.D.N.Y. 1991).

Absent a bar date, a Chapter 11 case could not be administered to a conclusion because there would not be a deadline limiting the filing of claims and for voting on a plan of reorganization. *See In re Waterman S.S. Corp.*, 59 B.R. 724, 726 (Bankr. S.D.N.Y. 1986). The purpose of a bar date is to provide a definitive cut-off date, so that the total number and amount of claims against a debtor’s estate can be calculated, the estate divided, and the debts discharged. *In re Arrow Air, Inc.*, 75 B.R. 375, 377-378 (Bankr. S.D. Fla. 1987). The bar date

advances the Bankruptcy Code's goal of expeditious claim adjudication. *See also In re Pigott*, 684 F.2d 239, 243 (3rd Cir. 1982); *In re Evanston Motor Company, Inc.*, 26 B.R. 998, 1005 (N.D. Ill. 1983), *aff'd*, 735 F.2d 1029, 10 C.B.C. 2d 1137 (7th Cir. 1984) (trustees, creditors, debtors and even bankruptcy judges are entitled to some measure of finality in a bankruptcy proceeding).

Chapter 11 reorganization usually involves settlement negotiations among a debtor and its creditors. As the Court is aware, the Debtors and other parties to the Reorganization Cases believe that early settlement negotiations in the context of a mediation are desirable. While the Debtors do not believe that the settlement process should be delayed until after the Claims Bar Date, having the claims process running at the same time that the parties are determining if they can agree on a consensual plan will facilitate the process. Ultimately, knowledge of the universe of claims is essential. Thus, an essential purpose of setting a claims deadline, in the Reorganization Cases, as in all other reorganization cases, is to fully inform participants in the reorganization process as to the debtor's liabilities.

IV. FORM OF PROOFS OF CLAIM.

Although proofs of claim in the Official Bankruptcy Form No. 10 (the "**Claim Form**") promulgated for that purpose are useful in most Chapter 11 cases, the Reorganization Cases are different than most Chapter 11 cases. Therefore, the Debtors propose that modifications to (the Claim Form be made in order to elicit necessary information for the resolution of the Tort Claims (the "**Tort Claim Form**"), while keeping the Tort Claim Form simple and streamlined enough that Tort Claimants are able to complete it without being daunted by its language. A copy of the

proposed Tort Claim Form is attached hereto as **Exhibit “A”**.⁴ To avoid confusion for the Tort Claimants, the Debtors have proposed a single Tort Claim Form to be used for both of the Debtors. To the extent any Tort Claim is against one entity or the other, such determination can later be made in the claims allowance process.⁵ The Debtors further propose that the Claim Form for other creditors’ claim, (the “**Other Claims Form**”) be modified only slightly in order to clearly advise claimants that they should only use the Other Claim Form if they are asserting claims other than Tort Claims. Copies of the proposed Other Claims Forms are attached hereto as **Exhibit “C”** (for the Arizona Entity) and **“E”** (for RCCDG).

It is well established that the Court, in appropriate circumstances, has the authority to modify Official Bankruptcy Form No. 10. *See In re A.H. Robins Co.*, 862 F.2d 1092 (4th Cir. 1988); *In re Eagle Picher Indus., Inc.*, 158 B.R. 713, 716 (Bankr. S.D. Ohio 1993). Furthermore, Bankruptcy Rule 9009 authorizes appropriate and necessary alterations in the Official Forms as follows:

[T]he Official Forms prescribed by the Judicial Conference of the United States shall be observed and used with alterations as may be appropriate. Forms may be combined and their contents rearranged to permit economies in their use. The Director of the Administrative Office of the United States Courts may issue additional forms for use under the Code. The forms shall be construed to be consistent with these rules and the Code.

The rationale for using a modified Tort Claim Form rather than the universal Claim Form is readily apparent. The information which will be requested from the Tort Claimants is critical to a reasonable evaluation and analysis of the liability of the Debtors for such alleged Tort

⁴ The Tort Claim Form is similar to the tort claim forms which have been used successfully in other Diocesan Chapter 11 cases.

⁵ As previously stated, the failure of a Tort Claimant to check the box indicating which Debtor the claim is asserted against or checking both boxes will not alone be grounds for objection to or disallowance of a Tort Claim.

Claims and will aid in negotiations with third parties, such as insurers, who might aid in funding a plan of reorganization. The proposed Tort Claim Form is designed to ensure Tort Claimants provide necessary information relating to their Tort Claim in such a way as to allow the Debtors to determine the nature, extent and validity of the Tort Claims being asserted against them while being sensitive to the special issues for Tort Claimants related to the information sought and the need to provide a form that does not discourage Tort Claimants from submitting a claim.

V. NOTICE OF THE BAR ORDER AND THE BAR DATE.

As stated, the purpose of the Reorganization Cases is to, among other things, provide for a framework by which Tort Claimants with cognizable Tort Claims are fairly, justly and equitably compensated. In order to accomplish that, the Debtors propose to give the broadest notice practicable of the Claims Bar Date. Pursuant to Bankruptcy Rule 2002(a)(7), the Debtors propose forms of bar date notices (the “**Bar Date Notice(s)**”) for both the Tort Claimants and the other creditors. A copy of the proposed Bar Date Notice (Confidential—for Tort Claimants) is attached hereto as **Exhibit “B”**, and proposed Bar Date Notices (Non-Confidential/Other Claims) are attached hereto as **Exhibit “D”** (for the Arizona Entity) and **“F”** (for RCCDG), respectively. In drafting the Bar Date Notice for the Tort Claimants, the Debtors have attempted to create a readily-accessible form that includes a map of the Diocese’s historic geographical territory (both before 1969 and after 1969). That way, Tort Claimants can determine whether they may have a claim against the Debtors based on their knowledge of the geographic location where they were abused. The Debtors propose to work with the Committee to set up a toll free number for Tort Claimants to call if they do not speak English, in order to access a translator

who speaks Spanish or Navajo,⁶ to obtain answers to questions regarding the filing of Tort Claims or completing the Tort Claim Form or otherwise obtaining information about the Reorganization Cases. The toll free number will be provided on the Tort Claimants' Bar Date Notice and Instructions.

The Debtors are aware that the Court typically requires claimants to receive specific notice that their claims are scheduled as disputed, contingent, and/or unliquidated, or will otherwise receive no distribution under a Plan. The Debtors have scheduled all of the Tort Claims as disputed, contingent, and unliquidated. Therefore, rather than confuse Tort Claimants with yet another form, the Debtors request that the Court excuse them from sending a separate notice to the Tort Claimants, and instead deem the Tort Claimants' Bar Date Notice as sufficient to advise the Tort Claimants that failure to file a Tort Claim Form may result in their inability to recover funds from the Debtors or vote on a plan of reorganization that the Debtors may file. (See Exhibits "B" and "F," at p. 3.)

With respect to other creditors, however, the Debtors will use the Court's form attached hereto as **Exhibit "G"** (the "**Disputed Claim Notice**"),⁷ to give notice to each creditor whose claim is scheduled as disputed, contingent, and/or unliquidated, that its claim has been scheduled as such and that such claimant may not receive a distribution under any Chapter 11 plan or be entitled to vote on such plan unless the creditor timely files a proof of claim.

⁶ The Debtors attempted to locate translators who speak other Native American languages of the Native American tribes within the territory of the Diocese have not been successful. If and to the extent any such translators are found prior to the deadline for giving notice of the bar date, the Debtors will include that information on the Tort Claim Form and Posted Notices.

⁷ Only RCCDG will send a Disputed Claim Notice, since the Arizona Entity has no scheduled creditors.

VI. PROPOSED PUBLIC NOTICING METHODS.

In order to ensure that the Debtors have captured the universe of claimants who assert Tort Claims against the Debtors, the Debtors propose a number of ways to give notice of the Claims Bar Date.

The Debtors propose to provide notice of the Claims Bar Date through publication of a notice that will be posted in various locations, as discussed herein and which, as indicated in Exhibit “I,” will be published in certain publications. The proposed form of such notice is attached hereto as **Exhibit “H”** (the “**Posted Notice**”). The Debtors propose that publication of the Posted Notice be given as indicated in Exhibit “I.”⁸

In addition to the Posted Notice for which the Debtors will purchase ads as indicated in Exhibit “I,” the Debtors propose to issue a press release to the major newspapers in which ad purchase is prohibitively expensive for the Debtors (when considering all the other forms of notice proposed), in the form attached hereto as **Exhibit “J”** (the “**Press Release**”).⁹ The Press Release would be issued in the first week after entry of the Order approving this Motion, with a request that it be published once a week for the first three (3) weeks after entry of the Order approving this Motion, then once in the third calendar month after approval of this Motion, and again in a final publication in the beginning of fourth calendar month following approval of this Motion. While the Debtors will request publication of the Press Release, whether or not to publish the Press Release and when (unlike purchased space) will be at the discretion of the

⁸ With respect to publishing the Posted Notice in publications such as newspapers identified in Exhibit “I”, some publications are distributed weekly or bi-weekly, and do not have a weekend or Sunday edition. Otherwise, the Debtors propose to publish in the Sunday edition.

⁹ In addition, in some instances where the cost of the ad is such that the Debtors can only purchase one ad, the applicable publication will be asked to also publish the Press Release.

particular publication. The publications in which the Debtor will request the Press Release be published as a public service announcement (“PSA”) are set forth on Exhibit “I.”

At the beginning of each calendar month following entry of the Order approving this Motion (ceasing two weeks prior to the Claims Bar Date), the Debtors will also send the Posted Notice with a copy of the Order approving this Motion and a letter requesting posting to certain locations that are located in the extremely remote areas, but may be close to one of the Parishes, including such locations as public health centers, post offices, and all Navajo Chapter Houses, as set forth on Exhibit “I.” The Debtors further request that this Court order the post offices and any federal public health centers and other federal agencies to post the Posted Notice when received from the Debtor.

Because the Diocese historically covered a larger geographical area than it does now, and in order to provide notice to as many potential creditors as possible under the circumstances of the Reorganization Cases, the Debtors propose to give notice in places that were historically, but are not now, within the territory of the Diocese. The Debtors will request that the Posted Notice be published in the *Catholic Sun* published by the Diocese of Phoenix and *People of God* published by the Archdiocese of Santa Fe. The Debtors will also publish the Posted Notice in its publication, *Voice of the Southwest*. The Debtors will also investigate whether there are other dioceses that should be requested to post and publish the Posted Notice.

The Debtors also propose to publish the Posted Notice in all Parish and Mission bulletins and to post it on any Parish and Mission news boards that are within the territory of the Diocese with the schedule being once a week for the first three (3) weeks after entry of the Order approving this Motion, then once in the third month after approval of this Motion and the final

publication approximately twenty (20) days prior to the expiration of the Claims Bar Date.¹⁰ Additionally, at the beginning of each calendar month following entry of the Order approving this Motion, the Debtors will request that the Diocese of Phoenix and the Archdiocese of Santa Fe request that all Parishes and Missions that were once but are no longer within the geographical area of the Diocese physically post the Posted Notice in each such Parish and Mission.

The Debtors will place the Posted Notice on the home page of their website and will also post on the website all pleadings related to this Motion, as well as copies of the various claim forms that any creditor or a Tort Claimant can download. The Debtors will also post the Posted Notice on the website of *Voice of the Southwest*. In addition, the Debtors will request that each Parish or Mission within the geographic area of the Diocese post the Posted Notice on each of their respective websites as well (to the extent any has a website).

Also, because many potential creditors may not receive a newspaper, have a computer, or have other means by which to access the Posted Notice or may not attend church or receive parish or diocesan publications, the Debtors have attempted to create alternative methods to disseminate the information of the Claims Bar Date such as posting the notices in chapter houses or other public places where potential creditors might visit, as set forth on Exhibit "I."

Lastly, recognizing the challenges because of the geographic area and make-up of the population, in an effort to reach as many people as possible, the Debtors will provide the Press

¹⁰ If the bulletins are not published weekly, the Debtor will work with the particular Parish or Mission to ensure that the publication is made five (5) times before expiration of the Claims Bar Date.

Release to the radio stations indicated on Exhibit “I” and ask that the Press Release be read either as a paid ad (as indicated in Exhibit “I”) or as a PSA as also indicated on Exhibit “I”.¹¹

As indicated above, the Debtors are attempting to reach as many potential claimants as possible, taking into account the unique issues and challenges with the geographic area of the Diocese and potential Tort Claimants as well as the financial constraints of these Debtors. Accordingly, and pursuant to applicable law, the Order setting the Claims Bar Date should provide that any creditor (including any Tort Claimant) who fails to timely file a Tort Claim Form pursuant to the Claims Bar Date may be prohibited from participating in the Reorganization Cases with respect to voting on a plan of reorganization, distribution under a plan of reorganization, or in any other regard. Nevertheless, the holder of any such unfiled claim (including any Tort Claim) would be bound by the terms of any plan of reorganization once confirmed by the Court in the Reorganization Cases. Furthermore, the Order should provide that any such claim, including a Tort Claim, may be subject to discharge.

VII. MANNER OF FILING TORT CLAIMS.

The Debtors propose¹² that the non-confidential Other Claims Form be filed in the same manner in which the Court typically accepts proofs of claim for filing, without any change in established procedure.

For Tort Claim Forms (subject to the comment of the Court and the Clerk’s Office), the Debtors and the Committee suggest that the Tort Claimants be instructed to mail or hand-deliver

¹¹ In some instances the Debtors will purchase ad time and in others the Debtors will simply request that the Posted Notice be read without cost to the Debtors as indicated in Exhibit “I.” The decision of whether to purchase an ad or request the PSA is driven by cost.

¹² The Debtors have discussed this proposed process for handling the filing of Tort Claim Forms with counsel for the Committee and the Debtors understand that the Committee concurs with this proposed process.

to the Court Clerk's Office, Attention: Jackie Satches,¹³ the signed original *plus one copy* of their completed Tort Claim Form, together with any accompanying or supporting documentation, so as to be received no later than 5:00 p.m., prevailing Mountain time on the Claims Bar Date. The Debtors propose that the Court retain the signed original Tort Claim Form in a designated confidential file in hard copy and the completed original Tort Claim Form would not be filed electronically but would be physically maintained by the Clerk in a sealed file subject to further orders of the Court. The Clerk of the Court would then forward the copies of the any filed Tort Claim Form to the Debtors' counsel for distribution to the Committee and any other party in interest that the Court determines should receive copies of the Tort Claim Forms (such as insurers) and who have agreed to an approved confidentiality protocol. The Debtors (with the concurrence of the Committee) believe this is the best way to maintain a highly confidential claims file while at the same time allowing the Debtors, the Committee and others who are allowed access a means to obtain the Tort Claim Forms without undue burden on the Clerk's office.

VIII. OTHER RELATED RELIEF REQUESTED PURSUANT TO LOCAL PRACTICE.

Pursuant to the "Order Granting Motion for Entry of an Order Directing Joint Administration" entered in each of the above-referenced jointly administered cases at Dkt. Nos. 36 (for the Arizona Entity) and 50 (for RCCDG), the Debtors request that any creditor filing a Tort Claim Form need only file the Tort Claim Form in the jointly administered case number (Case No. 13-13676-t11) in the form attached hereto as Exhibit "A" regardless of whether such Tort Claimant is claiming against one or both of the Debtors. Any creditor filing an Other Claims Form against

¹³ The Debtors understand that Ms. Satches is the Case Administrator assigned to the Reorganization Cases, and has already worked with Confidential Schedule F.

either or both of the Debtors shall file such form in the estate(s) of the Debtor(s) which such creditors contends is obligated for its claim. In the event there is joint and several liability on a claim between the Debtors, the details of the liability should be clearly stated, and the Other Claims Form should be filed in BOTH cases.

Also, to comply with the Court's form of Bar Date Order, with respect to claims concerning executory contracts, unexpired leases or avoidance actions, the Debtors request that the Court set a bar date for such claims, pursuant to 11 U.S.C. §§ 502(g) and (h), as the later of: (i) the Claims Bar Date; or, (ii) thirty (30) after the mailing to the claimant of notice of entry of an order approving the rejection of such executory contract, unexpired lease, or the avoidance of such transfer, with a copy of the Bar Date Notice. The Debtors further request that with respect to claims of governmental units, the Court also set a bar date for such claims, pursuant to U.S.C. § 502(b)(9), for the later of: (i) the Claims Bar Date; or, (ii) 180 days after the date of order for relief.

If the Debtors amend their bankruptcy schedules and the amendment reduces the liquidated amount of a scheduled claim, or reclassifies a claim scheduled as undisputed, liquidated, and non-contingent to a disputed, unliquidated, and/or contingent claim, then the Debtors request that each claimant affected by such amendment be permitted to file the applicable Tort Claim Form or Other Claims Form on or before the later of: (i) the Claims Bar Date; or, (ii) thirty (30) days after the mailing of notice of such amendment to such claimant with a copy of the Bar Date Notice AND the Disputed Claim Notice, but only to the extent such claim does not exceed the amount scheduled for such claim prior to such amendment. This extended claims bar date should not apply if an amendment to the Schedules increases the claim deemed filed under 11 U.S.C. § 1111(a) or if the creditor previously filed a Tort Claim Form or Other Claims Form on or before the Claims Bar Date.

The Debtors also request, in accordance with local practice, that the Claims Bar Date not apply to any particular types of pre-petition claims that the Court specifically authorizes to be paid, by order entered prior to the Claims Bar Date, or to administrative expenses arising under 11 U.S.C. §§ 330(a), 331, 364, 503, 507(a)(1), 507(a)(2), or 507(b).

In accordance with Bankruptcy Rule 9006(f) and the Court's local practice, the Debtors request that the three (3) day service time not be added to extend the date set as the Claims Bar Date, but that it will be added to the thirty (30) day deadlines set forth above. Notwithstanding any provision of Bankruptcy Rule 9006(f), if any deadline falls on a weekend or legal holiday, the deadline shall be extended to the next business day.

IX. CONCLUSION.

Wherefore, based upon the foregoing, the Debtors respectfully request that the Court enter an Order substantially in the form attached hereto as **Exhibit "K"** hereto (the "**Bar Date Order**"):

- A. Approving the Motion on the terms set forth in the Bar Date Order;
- B. Setting the Claims Bar Date for filing Proofs of Claim as one hundred twenty (120) days from the date of service of the Bar Date Order and related pleadings with such service to occur within ten (10) days after entry of the Bar Date Order or such other date as the Court determines is appropriate under the circumstances;
- C. Approving the forms of Tort Claim Form (including the instructions), Other Claims Form, Bar Date Notice and Instructions, Posted Notice, and Press Release as attached as exhibits hereto;
- D. Approving the proposed noticing methods set forth herein and in Exhibit "I" as providing good and adequate notice under the circumstances of these Reorganization Cases;

E. Ordering that any post office or other federal office or agency post the Posted Notice at the Debtor's request;

F. Ordering that any creditor (including any Tort Claimant) who fails to timely file a Tort Claim Form or Other Claims Form on or before the Claims Bar Date may be prohibited from participating in the Reorganization Cases with respect to voting on a plan of reorganization, distribution under a plan of reorganization, or in any other regard;

G. Ordering that any creditor's (including any Tort Claimant's) claim that is untimely filed (or who fails to file a Tort Claim Form or Other Claims Form) may have such claim discharged;

H. Ordering any creditor filing an Other Claims Form against either or both of the Debtors to file the proof of claim in the estate(s) of the Debtor(s) which is obligated on its claim only, and in the event there is joint and several liability on a claim between the Debtors, the details of the liability shall be clearly stated, and the Other Claims Form shall be filed in BOTH cases;

I. Ordering that the Tort Claims be filed and kept under seal in hard copy in the jointly administered case until liability against one Debtor or the other is determined, in accordance with a confidentiality procedure to be agreed upon between the Debtors and the Committee, as ordered by the Court;

J. Ordering that the Clerk of the Court provides copies of the Tort Claims to counsel for the Debtors;

K. Ordering that the bar date for claims concerning executory contracts or unexpired leases, and avoidance actions be set for the later of: (i) the Claims Bar Date; or, (ii) thirty (30) days after the mailing to the claimant of notice of entry of an order approving the rejection of

such executory contract or unexpired lease, or the avoidance of such transfer, with a copy of the Bar Date Notice;

L. Ordering that the claims bar date for governmental units be set for the later of: (i) the Claims Bar Date; or, (ii) one hundred eighty (180) days after the date of order for relief;

M. Ordering that, if the Debtors amend the Schedules and the amendment reduces the liquidated amount of a scheduled claim, or reclassifies a claim scheduled as undisputed, liquidated, and non-contingent to a disputed, unliquidated, and/or contingent claim, then each claimant affected by such amendment be permitted to file the Tort Claim Form or Other Claims Form relating to such claim on or before the later of: (i) the Claims Bar Date; or, (ii) thirty (30) days after the mailing of notice of such amendment to such claimant with a copy of the Bar Date Notice and the Disputed Claim Notice, but only to the extent such claim does not exceed the amount scheduled for such claim prior to such amendment. This extended claims bar date should not apply if an amendment to the Schedules increases the claim deemed filed under 11 U.S.C. § 1111(a) or if the creditor previously filed a Tort Claim Form or Other Claims Form on or before the Claims Bar Date;

N. Ordering that the Claims Bar Date does not apply to any particular types of pre-petition claims that the Court specifically authorizes to be paid, by order entered prior to the Claims Bar Date, or to administrative expenses arising under 11 U.S.C. §§ 330(a), 331, 364, 503, 507(a)(1), 507(a)(2), or 507(b);

O. Ordering that the three (3) day service time shall not be added to extend the date set as the Claims Bar Date, but that it shall be added to the thirty (30) day deadlines set forth above, and that notwithstanding any provision of Bankruptcy Rule 9006(f), if any deadline falls on a weekend or legal holiday, the deadline shall be extended to the next business day;

P. Ordering that the Debtors, the Committee and the U.S. Trustee submit a confidentiality protocol to the Court for approval regarding the manner in which copies of the Tort Claims will be provided to the Committee or any other party with a need to review the claims as approved by the Court; and

Q. Granting such other relief as the Court deems just and proper under the circumstances.

RESPECTFULLY SUBMITTED this 6th day of March, 2014.

/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)
Admitted Pro Hac Vice
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

Counsel for the Debtors

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 “Motion for an Order Fixing Time for Filing Proofs of Claim, Approving Claim Forms, and Approving Manner and Form of Notice” was made on March 6, 2014 via e-mail and the notice transmission facilities of the Bankruptcy Court’s case management and electronic filing system on the following parties:

Ronald E. Andazola
Leonard Martinez-Metzgar
Office of the U.S. Trustee
P.O. Box 608
Albuquerque, NM 87103
ustpregion20.aq.ecf@usdoj.gov
ronald.andazola@usdoj.gov
leonard.martinez-metzgar@usdoj.gov

Thomas D. Walker
Stephanie L. Schaeffer
Walker & Associates, P.C.
500 Marquette N.W., Suite 650
Albuquerque, NM 87102
twalker@walkerlawpc.com
sschaeffer@walkerlawpc.com
*Local Counsel for Debtor
and Debtor-in-Possession*

James I. Stang
Gillian N. Brown
Pachulski Stang Ziehl & Jones
10100 Santa Monica Blvd., 13th Floor
Los Angeles, CA 90067
jstang@pszjlaw.com
gbrown@pszjlaw.com
*Proposed Counsel for the Official
Committee of Unsecured Creditors*

Kenneth H. Brown
Pachulski Stang Ziehl & Jones
150 California Street, 15th Floor
San Francisco, CA 94111
kbrown@pszjlaw.com
*Proposed Counsel for the Official
Committee of Unsecured Creditors*

Robert E. Pastor
Montoya, Jimenez & Pastor, P.A.
3200 N. Central Ave., Suite 2550
Phoenix, AZ 85012
repastor@mjpattorneys.com
Counsel for Tort Claimants

John Manly
Manly & Stewart
19100 Von Karman Ave., Suite 800
Irvine, CA 92612
jmanly@manlystewart.com
Counsel for Tort Claimants

Richard T. Fass
Donald H. Kidd
Perdue & Kidd, LLP
510 Bering Dr., Suite 550
Houston, TX 77057
rfass@perdueandkidd.com
dkidd@perdueandkidd.com
Counsel for Tort Claimants

Dennis Jontz
Lewis Roca Rothgerber
201 Third Street, NW, Ste. 190
Albuquerque, NM 87102
djontz@lrrlaw.com
*Local Counsel for Catholic
Peoples Foundation*

Robert M. Charles, Jr.
Susan M. Freeman
Justin J. Henderson
Lewis Roca Rothgerber LLP
201 E. Washington St., Suite 1200
Phoenix, AZ 85004
rcharles@lrrlaw.com
sfreeman@lrrlaw.com
jhenderson@lrrlaw.com
*Counsel for Catholic Peoples Foundation and
Parish Steering Committee of Roman Catholic
Church of the Diocese of Gallup*

Christopher R. Kaup
J. Daryl Dorsey
Tiffany & Bosco
Camelback Esplanade II
2525 E. Camelback Rd., Ste. 300
Phoenix, AZ 85016
crk@tblaw.com
jdd@tblaw.com
Counsel for Southwest Indian Foundation, Inc.

Charles R. Hughson
Rodey, Dickason, Sloan,
Akin & Robb, P.A.
P.O. Box 1888
Albuquerque, NM 87103
chughson@rodey.com
*Counsel for St. Bonaventure Indian
Mission & School*

Edward A. Mazel
James A. Askew
Daniel A. White
Askew & Mazel, LLC
320 Gold Ave. S.W., Suite 300 A
Albuquerque, NM 87102
edmazel@askewmazelfirm.com
jaskew@askewmazelfirm.com
dwhite@askewmazelfirm.com
*Attorneys for New Mexico Property and Casualty
Insurance Guaranty Association*

Douglas R. Vadnais
Modrall, Sperling, Roehl,
Harris & Sisk, P.A.
P.O. Box 2168
Albuquerque, NM 87103
drv@modrall.com
*Counsel for The Bank of Colorado
d/b/a Pinnacle Bank*

George M. Moore
Bonnie B. Gandarilla
Moore Berkson & Gandarilla P.C.
3800 Osuna Rd., NE, Ste. 2
Albuquerque, NM 87109
mbglaw@swcp.com
bbg11usc@swcp.com
*Local Counsel for Southwest
Indian Foundation, Inc.*

Steven D. Jerome
Snell & Wilmer, LLP
One Arizona Center
400 E. Van Buren St., Ste. 1900
Phoenix, AZ 85004
sjerome@swlaw.com
*Counsel for The Roman Catholic
Church of the Diocese of Phoenix*

/s/ Susan G. Boswell

Susan G. Boswell

EXHIBIT "A"

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

In re:

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

Debtor.

Jointly Administered with:

BISHOP OF THE ROMAN CATHOLIC
CHURCH OF THE DIOCESE OF GALLUP,
an Arizona corporation sole.

This pleading applies to:

- All Debtors.
 Specified Debtor.

Chapter 11

Case No. 13-13676-t11

Jointly Administered with:

Case No. 13-13677-t11

CONFIDENTIAL PROOF OF CLAIM (SEXUAL ABUSE)

IMPORTANT THIS FORM MUST BE RECEIVED
NO LATER THAN _____, 2014

PARA ESPANOL, LLAME...
FOR DINE/NAVAJO...

Carefully read Notice and Instructions that are included with this CONFIDENTIAL PROOF OF CLAIM and complete ALL applicable questions. Send *together with one copy* to: **Clerk of the United States Bankruptcy Court, District of New Mexico, P.O. Box 546, Albuquerque, New Mexico 87103.** If you prefer to hand deliver the completed Confidential Proof of Claim form to the Clerk, the physical address for hand delivery is **Clerk of the United States Bankruptcy Court, District of New Mexico, 500 Gold Avenue SW, Tenth Floor, Albuquerque, New Mexico.** If you mail or delivery the Confidential Proof of Claim form it must be received by the Clerk no later than 5:00 p.m. on _____, 2014.

YOU MAY WISH TO CONSULT AN ATTORNEY REGARDING THIS MATTER, AND YOU MAY ALSO OBTAIN INFORMATION FROM THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS BY CALLING TOLL FREE AT _____. FAILURE TO COMPLETE AND RETURN THIS FORM MAY RESULT IN YOUR INABILITY TO VOTE ON A PLAN OF REORGANIZATION AND RECEIVE A DISTRIBUTION FROM THE BISHOP OF THE ROMAN CATHOLIC CHURCH OF THE DIOCESE OF GALLUP OR THE ROMAN CATHOLIC CHURCH OF THE DIOCESE OF GALLUP, COMMONLY KNOWN AS THE DIOCESE OF GALLUP.

PART 2: NATURE OF COMPLAINT
(Attach additional separate sheets if necessary)

NOTE: IF YOU HAVE PREVIOUSLY FILED A COMPLAINT AGAINST THE DEBTOR IN THE ARIZONA OR NEW MEXICO STATE COURTS, YOU MAY ATTACH THE COMPLAINT IN LIEU OF PROVIDING THE INFORMATION BELOW SO LONG AS THE INFORMATION BELOW IS CONTAINED IN THE COMPLAINT. IF THE INFORMATION BELOW IS NOT CONTAINED IN THE COMPLAINT OR YOU DID NOT FILE A COMPLAINT, YOU MUST COMPLETE THE INFORMATION BELOW.

1. Who committed the acts of sexual abuse? _____

2. Position, Title or Relationship to You (if known) (e.g., Parish, Priest, Teacher, Coach, etc.)

3. Where did the sexual abuse take place? Please be specific and complete all relevant information that you know, including the City and State, name of the Parish, Mission or School (if applicable) and/or the name of any other location.

4. When did the sexual abuse take place?
 - a. If the sexual abuse took place over a period of time (months or years) please state when it started, when it stopped, and if it happened all during that time.

 - b. Please also state your age(s) and your grade(s) in school at the time the sexual abuse took place.

5. What happened (describe what happened):

6. Did you tell anyone about the sexual abuse and, if so, who did you tell and when (this would include parents, relatives, friends, the Diocese of Gallup and law enforcement authorities).

PART 3: IMPACT OF COMPLAINT
(Attach additional separate sheets if necessary)

(If you are uncertain how to respond to the first question in this Part 3, you presently may leave the first question in this Part 3 blank, but you will be required to complete the first question in this Part 3 within thirty (30) days after a written request is made for the information requested in the first question of this Part 3.)

1. What injuries have occurred to you because of the act or acts of sexual abuse that resulted in the claim (for example, the effect on your education, employment, personal relationships and health)?

2. Have you sought counseling or treatment? If so, with whom and when? _____

3. Are you interested in being contacted by the Diocese of Gallup's Victim Assistance Coordinator about receiving counseling? Yes No

PART 4. Additional Information

1. Settlements: Regardless of whether a complaint was ever filed against any party because of the sexual abuse, have you settled any claim relating to the sexual abuse described in this claim? Yes No

If "Yes", please describe the terms of the settlement including parties to the settlement, and attach a copy of any settlement agreement.

2. I am submitting this claim against:

- Roman Catholic Church Of The Diocese Of Gallup, a New Mexico corporation sole
 Bishop Of The Roman Catholic Church Of The Diocese Of Gallup, an Arizona corporation sole

Date: _____

Sign and print the name and title, if any, of the Claimant or other person authorized to file this claim. If you are signing this claim on behalf of a Claimant you must list your relationship to the Claimant.

Under penalty of perjury, I declare the foregoing statements to be true and correct.

Signature: _____

Print Name: _____

Relationship to Claimant (if not signed by Claimant): _____

EXHIBIT "B"

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

<p>In re:</p> <p>ROMAN CATHOLIC CHURCH OF THE DIOCESE OF GALLUP, a New Mexico corporation sole,</p> <hr style="width: 80%; margin-left: auto; margin-right: auto;"/> <p style="text-align: center;">Debtor.</p> <hr/> <p>Jointly Administered with:</p> <p>BISHOP OF THE ROMAN CATHOLIC CHURCH OF THE DIOCESE OF GALLUP, an Arizona corporation sole.</p> <p>This pleading applies to:</p> <p><input checked="" type="checkbox"/> All Debtors. <input type="checkbox"/> Specified Debtor.</p>	<p>Chapter 11</p> <p>Case No. 13-13676-t11</p> <p>Jointly Administered with:</p> <p>Case No. 13-13677-t11</p>
---	--

NOTICE AND INSTRUCTIONS

**THIS IS AN IMPORTANT NOTICE REGARDING ALL SEXUAL ABUSE CLAIMS
AGAINST THE ABOVE-NAMED ENTITIES THAT ARE COMMONLY REFERRED
TO AS THE DIOCESE OF GALLUP—YOUR RIGHTS MAY BE AFFECTED**

NOTE: _____, 2014
IS THE DEADLINE TO FILE PROOFS OF CLAIM

PARA ESPANOL, LLAME...
FOR DINE/NAVAJO ...

TO: ANY CREDITOR/INJURED PARTY OF THE DIOCESE OF GALLUP, (WHOSE CORPORATE NAMES ARE: BISHOP OF THE ROMAN CATHOLIC CHURCH OF THE DIOCESE OF GALLUP AND/OR THE ROMAN CATHOLIC CHURCH OF THE DIOCESE OF GALLUP) WHO ASSERTS A CLAIM BASED UPON SEXUAL ABUSE BY A PRIEST, MEMBER OF THE CLERGY, A WORKER OR OTHER PERSON OR ENTITY ASSOCIATED WITH THE DIOCESE OF GALLUP:

The civil forms of the Diocese of Gallup, Bishop of the Roman Catholic Church of the Diocese of Gallup, an Arizona corporation sole and the Roman Catholic Church of the Diocese of Gallup, a New Mexico corporation sole, (collectively, the “**Debtors**”) each filed a Chapter 11 reorganization case on November 12, 2013, in the United States Bankruptcy Court for the District of New Mexico (the “**Bankruptcy Court**”). Numerous individuals have asserted sexual abuse claims against the Debtors. Such claims allege sexual abuse by priests, and others connected with the parishes, schools or other institutions located within the geographic territory of the Diocese of Gallup occurring as long ago as the 1950’s or, possibly, earlier. Any person

who believes that he or she has or may have a claim against the Debtors or the Diocese of Gallup relating to sexual abuse should carefully read this notice.

YOU MAY WISH TO CONSULT AN ATTORNEY REGARDING THIS MATTER AND MAY ALSO OBTAIN INFORMATION FROM THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS BY CALLING _____ OR YOU MAY OBTAIN COPIES OF PLEADINGS AND OTHER INFORMATION BY VISITING THE WEBSITE OF THE DIOCESE OF GALLUP AT www.dioceseofgallup.org.

FILING DEADLINE

The Bankruptcy Court entered an order (the “**Bar Date Order**”) in the Chapter 11 reorganization case of the Debtors setting _____, 2014 (the “**Claims Bar Date**”) as the last date by which Proofs of Claim may be filed against the Debtors.

WHO MUST FILE A PROOF OF CLAIM

In order to preserve your rights, you must file a Proof of Claim if you were sexually abused by any member of the clergy or any other person connected with the Diocese of Gallup, the parishes, missions, schools or other institutions within the geographic territory of the Diocese of Gallup. For your information, attached to this Notice is a map of the territory currently served by the Diocese of Gallup. Also attached for your information and assistance in completing the Proof of Claim is a map of the territory served by the Diocese of Gallup prior to 1969 when certain portions of the Diocese of Gallup became part of the Diocese of Phoenix, Arizona.

If you believe that you have a claim against the Debtors because you were sexually abused by any member of the clergy or any other person connected with the Debtors or the Diocese of Gallup, the parishes, missions, schools or other institutions within the geographic territory of the Diocese of Gallup, **you must file a Proof of Claim**. Even if you already filed a lawsuit against the Debtors prior to November 12, 2013, **you still must file a Proof of Claim** to maintain (preserve) your rights in the Debtors’ Chapter 11 case. If you settled a claim with the Debtors before November 12, 2013, but you have not yet been paid, have not been fully paid or you believe you are still entitled to compensation, **you must still file a Proof of Claim** for the unpaid amount. If you have been fully paid, you need not file a claim.

You are receiving this notice because you have been identified as someone who might contend that you were sexually abused by a member of the clergy or other person connected with the Debtors, the parishes, missions, schools or other institutions within the geographic territory of the Diocese of Gallup or you contend that someone associated with the Debtors, the parishes, missions, schools or other institutions within the geographic territory of the Diocese of Gallup committed acts that occurred outside the geographic territory of the Diocese of Gallup but for which you believe the Debtors are responsible. In all events, if you believe that the Debtors are responsible to you for damages you suffered because of those acts of sexual abuse, **you must file a Proof of Claim**.

YOU MUST COMPLETE THE CONFIDENTIAL PROOF OF CLAIM FORM WHICH IS ENCLOSED WITH THIS NOTICE IF YOU CONTEND THAT THE DEBTORS ARE RESPONSIBLE FOR ANY DAMAGES TO YOU BECAUSE YOU WERE SEXUALLY ABUSED, WHETHER: (1) BY A PRIEST, A NUN, A WORKER, A VOLUNTEER, AN EMPLOYEE OR OTHER PERSON OR ENTITY ASSOCIATED WITH THE DEBTORS, OR ASSOCIATED WITH A PARISH, SCHOOL, MISSION OR OTHER INSTITUTION WITHIN THE GEOGRAPHIC TERRITORY OF THE DIOCESE OF GALLUP (SEE THE ATTACHED EXHIBITS); OR (2) THROUGH ACTS THAT OCCURRED BEYOND THE GEOGRAPHIC TERRITORY OF THE DIOCESE OF GALLUP FOR WHICH YOU CLAIM THE DEBTORS ARE RESPONSIBLE.

WHO SHOULD NOT FILE A CLAIM

You should **not** file a Proof of Claim if:

- Your claim has already been paid in full.
- You hold a claim that has been allowed by an order of the Bankruptcy Court on or before the Claims Bar Date.

YOU SHOULD NOT FILE A PROOF OF CLAIM IF YOU DO NOT HAVE A CLAIM AGAINST THE DEBTORS OR THE DIOCESE OF GALLUP.

THE FACT THAT YOU RECEIVED THIS NOTICE DOES NOT MEAN THAT YOU HAVE A CLAIM AGAINST THE DEBTORS OR THAT THE DEBTORS OR THE BANKRUPTCY COURT BELIEVES THAT YOU HAVE A CLAIM NOR DOES IT MEAN THAT EVEN IF YOU FILE A CLAIM YOU WILL RECEIVE COMPENSATION. THERE WILL BE A LATER PROCESS FOR ALLOWING CLAIMS.

CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM

THE DEADLINE FOR FILING PROOFS OF CLAIM IS _____, 2014 WHICH MEANS THAT PROOFS OF CLAIM MUST BE RECEIVED BY THAT DATE. ANY PERSON WHO HAS A CLAIM AND DOES NOT FILE A PROOF OF CLAIM FORM BY THAT DATE MAY NOT BE TREATED AS A CREDITOR FOR VOTING OR DISTRIBUTION UNDER ANY PLAN OF REORGANIZATION AND THE CLAIM WILL BE SUBJECT TO DISCHARGE. FAILURE TO FILE A CLAIM MAY PREVENT YOU FROM VOTING ON ANY PLAN OF REORGANIZATION IN THESE CHAPTER 11 CASES. IN ADDITION, IF THE CLAIM IS DISCHARGED, THE CLAIMANT WILL BE FOREVER PREVENTED FROM ASSERTING HIS OR HER CLAIM AGAINST THE DEBTORS (THE DIOCESE OF GALLUP) OR THEIR PROPERTY AND WILL NOT RECEIVE ANY PAYMENT OR DISTRIBUTION ON SUCH CLAIM.

WHAT TO FILE

YOU MUST FILE A CONFIDENTIAL PROOF OF CLAIM ON THE FORM THAT ACCOMPANIES THIS NOTICE.

INSTRUCTIONS FOR FILLING OUT THE PROOF OF CLAIM FORM

You must complete the entire Proof of Claim form that accompanies this Notice. You should provide as complete information as you can and answer every question. If you have any papers that support your claim, you should make copies of those papers and attach them to the Proof of Claim form before you file it.

There is a Committee that has been appointed to represent the interests of creditors like you in these cases. If you have any questions regarding the Proof of Claim form you can call _____ to obtain answers to your questions. Although _____ represents the Committee, _____ cannot give you legal advice.

The Proof of Claim form should be filled out by the person who claims he or she has been injured. However, if the person who is making a claim against the Debtors is unable to complete the Proof of Claim form or if the person who was injured does not wish to submit a Proof of Claim form on his or her own behalf, and you are filing the Proof of Claim form on the injured party's behalf, you must indicate that on the Proof of Claim form and also state the basis upon which you are filing the proof of claim on someone else's behalf.

WHEN AND WHERE TO FILE

A signed original *plus one copy* of a completed Tort Claimant's Confidential Proof of Claim form, together with any accompanying or supporting documentation, must be delivered or mailed to the address below so as to be **received** no later **5:00, p.m.**, _____, **2014** by:

**Clerk of the United States Bankruptcy Court
District of New Mexico
Attn: Ms. Jackie Satches
P.O. Box 546
Albuquerque, NM 87103**

(Please Note: If you are going to personally deliver the Tort Claimant's Confidential Proof of Claim to the Clerk's office or have someone deliver it on your behalf, the filing window is only open on Court days until 4:30 p.m. Mountain time, and you may need to arrive at the Clerk's office by 3:00 p.m. due to wait times in order for your Proof of Claim to be timely filed. The physical address for the Clerk's office for personal delivery is Clerk of the United States Bankruptcy Court, District of New Mexico, Dennis Chavez Federal Building and United States Courthouse, 500 Gold Avenue SW, Tenth Floor, Albuquerque, NM 87103.)

Proofs of Claim may not be submitted by facsimile or e-mail.

If you wish to receive acknowledgement of receipt of your Proof of Claim, include with your original Proof of Claim, (a) an additional copy of your original Proof of Claim and (b) a self-addressed, stamped return envelope. Proofs of Claim must include all documentation, if any, that you have to support your claim.

CONFIDENTIALITY

The Bankruptcy Court has determined that the Proofs of Claim filed by anyone who alleges that he or she was sexually abused by a member of the clergy, a worker or other person or entity associated with the Debtors or the Diocese of Gallup will remain **confidential**. Therefore, the Proof of Claim you file will not be available to the general public but will be kept confidential, except that the information may be provided, under Court-approved guidelines, to the Debtors and the attorneys for their insurers, the Committee, any Future Claims Representative or Guardian ad litem appointed in the Chapter 11 cases and such other persons as the Bankruptcy Court determines should have the information in order to evaluate the claim, all of whom will agree to keep the information provided by you **confidential**.

ADDITIONAL INFORMATION

Attached are the names of the schools, parishes and missions as they existed from time to time within the geographic territory of the Diocese of Gallup as well a map of the configuration of the Diocese of Gallup before 1969 and after 1969. If you need additional information regarding the schools, parishes and missions as they existed from time to time within the geographic territory of the Diocese of Gallup, you can obtain that information by calling the Debtors at _____. If you have questions or want information about the Debtors' reorganization, you can call the Committee's toll free number at _____.

DATED this ____ day of _____, 2014.

/s/

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
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

Counsel for Debtor

**LIST OF PARISHES, MISSIONS, AND SCHOOLS WITHIN THE GEOGRAPHIC
BOUNDARIES OF THE DIOCESE OF GALLUP**

New Mexico:

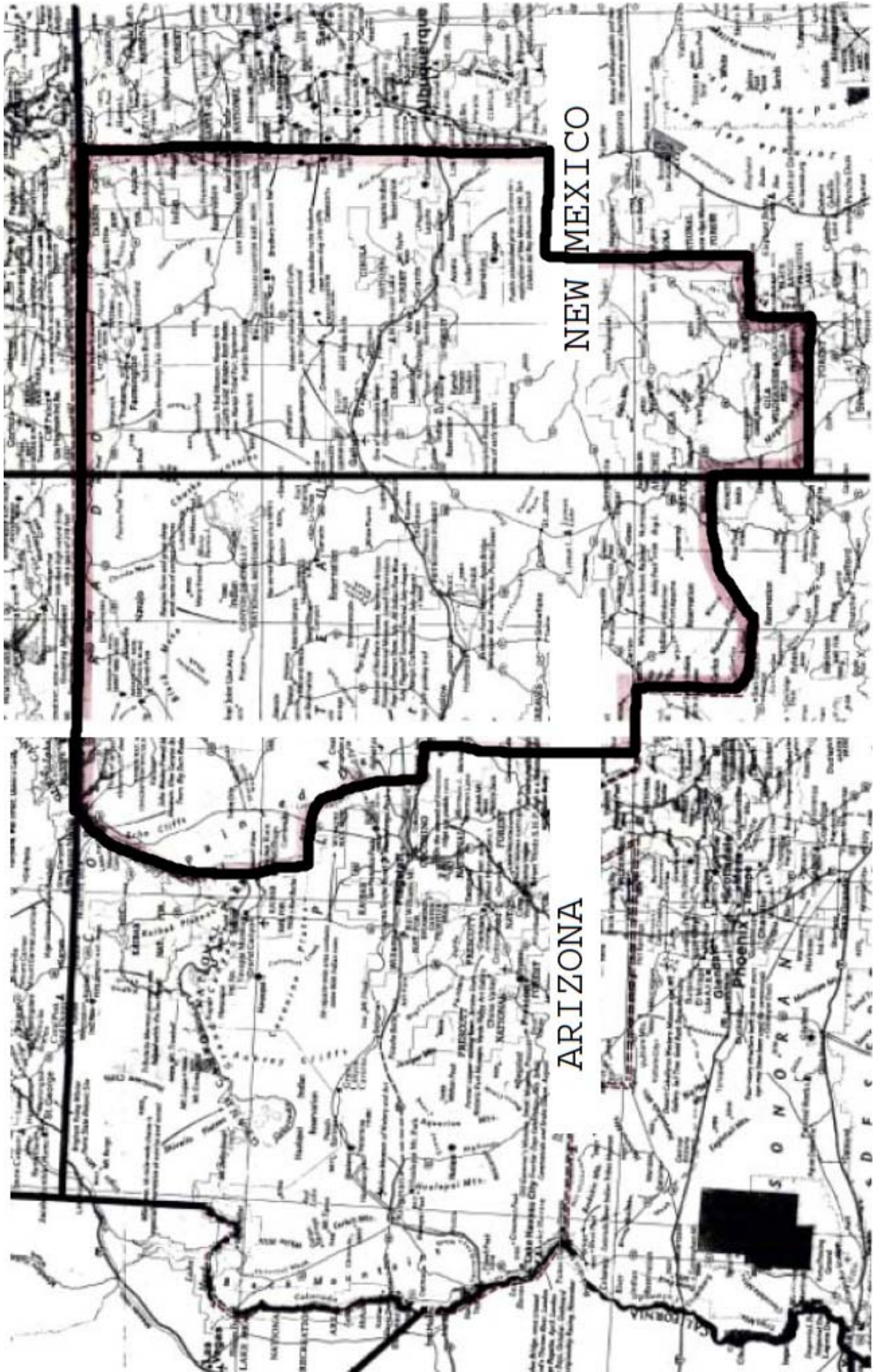
Acoma - San Esteban del Rey
Acomita - St. Anne
Aragon - Santo Niño de Atocha
Aztec - St. Joseph
Bibo - Our Lady of Loretto
Blanco - St. Rose of Lima
Bloomfield - St. Mary
Bluewater Lake - Risen Savior
Cabazon - San Jose
Cebolleta (Seboyeta) - Our Lady of Sorrows
Chichiltah - St. Patrick
Crownpoint - St. Paul
Cuba - Immaculate Conception
Cuba - Immaculate Conception School
Cubero - Our Lady of Light
Datil - Nativity of the Blessed Virgin Mary
Dulce - St. Anthony
Encinal - Nativity of the Blessed Virgin Mary
Farmington - Sacred Heart
Farmington - Sacred Heart School
Farmington - St. Mary
Flora Vista - Holy Trinity
Gallup - Gallup Catholic School
Gallup - Sacred Heart Cathedral
Gallup - St. Francis of Assisi
Gallup - St. Francis of Assisi School
Gallup - St. John Vianney
Glenwood - Santo Niño
Grants - St. Teresa Avila School
Grants - St. Teresa of Avila
Horse Springs - St. Anne
Kirtland - San Juan Catholic Center
La Jara - Santo Niño de Atocha
Laguna - St. Joseph
Lower San Francisco - San Isidro
Lumberton - St. Francis of Assisi
Lumberton - St. Francis of Assisi School
McCartys - Santa Maria de Acoma
Mesita - Sacred Heart of Jesus
Milan - St. Vivian
Moquino - Santa Rosalia

Naschitti - St. Anthony
Navajo - St. Berard
Paguete - St. Elizabeth of Hungary
Paraje - St. Margaret Mary
Pinehaven - Good Shepherd
Quemado - Sacred Heart
Reserve - St. Francis
San Fidel - St. Joseph School
San Fidel - St. Joseph the Worker
San Luis - San Aloysius Gonzaga
San Mateo - Cibola Catholic Community aka San Mateo Church
San Rafael - Cibola Catholic Community aka San Rafael Church
Seama - St. Anne
Shiprock - Christ the King
Thoreau - St. Bonaventure School
Tinaja/Ramah - San Lorenzo
Tohatchi - St. Mary
Waterflow - Sacred Heart
Zuni - St. Anthony
Zuni - St. Anthony School

Arizona:

Alpine - St. Helena
Chinle - Our Lady of Fatima
Cibecue - St. Catherine
Concho - San Rafael
Fort Defiance - Our Lady of the Blessed Sacrament
Ganado - All Saints
Greasewood - Our Lady of the Rosary
Holbrook - Our Lady of Guadalupe
Houck - St. John the Evangelist
Kayenta - Our Lady of Guadalupe
Keams Canyon - St. Joseph
Klagetoh - St. Anne
Lukachukai - St. Isabel
Many Farms - St. Anthony
McNary - St. Anthony
Overgaard/Heber - Our Lady of the Assumption
Page - Immaculate Heart of Mary
Pine Springs - St. Rose
Pinetop - St. Mary of the Angels
Piñon - St. Mary of the Rosary
Round Rock - Our Lady of Guadalupe
Sawmill - St. Francis
Show Low - St. Anthony School
Show Low - St. Rita
Snowflake - Our Lady of the Snow
Springerville - St. Peter
St. Johns - St. John the Baptist
St. Michaels - St. Michaels
St. Michaels - St. Michaels Elementary School
St. Michaels - St. Michaels High School
Tsaile - St. Ann
Tuba City - St. Jude
Wheatfields - Our Lady of the Lake
Whiteriver - St. Francis of Assisi
Winslow - Holy Family Chapel
Winslow - Madre de Dios
Winslow - St. Joseph

CURRENT DIOCESE OF GALLUP TERRITORY (1969-PRESENT):



DIOCESE OF GALLUP TERRITORY PRIOR TO 1969 (1939-1969):

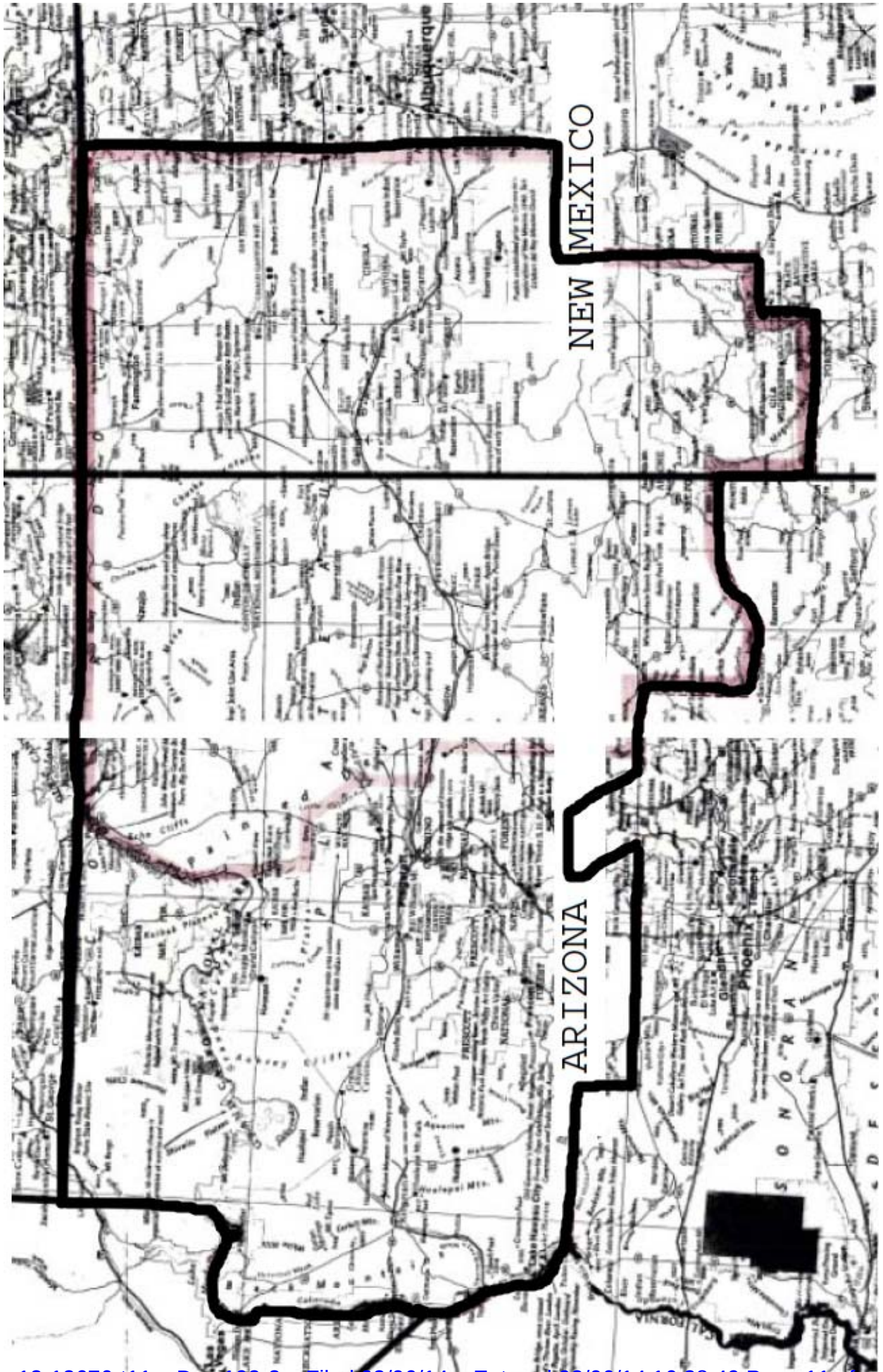


EXHIBIT "C"

**DO NOT USE THIS FORM IF YOUR CLAIM IS BASED ON SEXUAL ABUSE BY CLERGY,
WORKERS OR OTHER PERSONS OR ENTITIES ASSOCIATED WITH
THE BISHOP OF THE ROMAN CATHOLIC CHURCH OF THE DIOCESE OF GALLUP**

UNITED STATES BANKRUPTCY COURT		DISTRICT OF NEW MEXICO	PROOF OF CLAIM
Name of Debtor: Bishop of the Roman Catholic Church of the Diocese of Gallup, an Arizona corporation sole		Case Number: 13-13677-t11	
<i>NOTE: Do not use this form to make a claim for an administrative expense that arises after the bankruptcy filing. You may file a request for payment of an administrative expense according to 11 U.S.C. §503.</i>			
Name of Creditor (the person or other entity to whom the debtor owes money or property):		COURT USE ONLY	
Name and address where notices should be sent:		<input type="checkbox"/> Check this box if this claim amends a previously filed claim. Court Claim Number: _____ <i>(If known)</i> Filed on: _____	
Telephone number: _____ email: _____			
Name and address where payment should be sent (if different from above):		<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to this claim. Attach copy of statement giving particulars.	
Telephone number: _____ email: _____			
1. Amount of Claim as of Date Case Filed: \$ _____ If all or part of the claim is secured, complete item 4. If all or part of the claim is entitled to priority, complete item 5. <input type="checkbox"/> Check this box if the claim includes interest or other charges in addition to the principal amount of claim. Attach a statement that itemizes interest or charges.			
2. Basis for Claim: _____ (See instruction #2)			
3. Last four digits of any number by which creditor identifies debtor: _____		3a. Debtor may have scheduled account as: _____ (See instruction #3a)	3b. Uniform Claim Identifier (optional): _____ (See instruction #3b)
4. Secured Claim (See instruction #4) Check the appropriate box if the claim is secured by a lien on property or a right of setoff, attach required redacted documents, and provide the requested information.		Amount of arrearage and other charges, as of the time case was filed, included in secured claim, if any: \$ _____	
Nature of property or right of setoff: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe: _____ Value of Property: \$ _____ Annual Interest Rate ___% <input type="checkbox"/> Fixed or <input type="checkbox"/> Variable (when case was filed)		Basis for perfection: _____ Amount of Secured Claim: \$ _____ Amount Unsecured: \$ _____	
5. Amount of Claim Entitled to Priority under 11 U.S.C. §507(a). If any part of the claim falls into one of the following categories, check the box specifying the priority and state the amount.			
<input type="checkbox"/> Domestic support obligations under 11 U.S.C. §507(a)(1)(A) or (a)(1)(B).	<input type="checkbox"/> Wages, salaries, or commissions (up to \$12,475*) earned within 180 days before the case was filed or the debtor's business ceased, whichever is earlier - 11 U.S.C. §507(a)(4).	<input type="checkbox"/> Contributions to an employee benefit plan - 11 U.S.C. §507(a)(5).	Amount entitled to priority: \$ _____
<input type="checkbox"/> Up to \$2,775* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use - 11 U.S.C. §507(a)(7).	<input type="checkbox"/> Taxes or penalties owed to governmental units - 11 U.S.C. §507(a)(8).	<input type="checkbox"/> Other - Specify applicable paragraph of 11 U.S.C. §507(a)(__).	
<i>*Amounts are subject to adjustment on 4/1/16 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.</i>			

6. **Credits:** The amount of all payments on this claim has been credited for the purpose of making this proof of claim. (See instruction #6)

7. **Documents:** Attached are **redacted** copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, security agreements, or, in the case of a claim based on an open-end or revolving consumer credit agreement, a statement providing the information required by FRBP 3001(c)(3)(A). If the claim is secured, box 4 has been completed, and **redacted** copies of documents providing evidence of perfection of a security interest are attached. If the claim is secured by the debtor's principal residence, the Mortgage Proof of Claim Attachment is being filed with this claim. (See instruction #7, and the definition of "redacted")

DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING.

If the documents are not available, please explain:

8. **Signature:** (See instruction #8)

Check the appropriate box.

- I am the creditor.
- I am the creditor's authorized agent.
- I am the trustee, or the debtor, or their authorized agent. (See Bankruptcy Rule 3004.)
- I am a guarantor, surety, indorser, or other codebtor. (See Bankruptcy Rule 3005.)

I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief.

Print Name: _____

Title: _____

Company: _____

Address and telephone number (if different from notice address above) : _____ (Signature) _____ (Date)

Telephone number: _____

email: _____

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§152 and 3571.

INSTRUCTIONS FOR PROOF OF CLAIM FORM
(SEE ALSO THE NOTICE OF CLAIMS BAR DATE ACCOMPANYING THIS PROOF OF CLAIM FORM)

**DO NOT USE THIS FORM IF YOUR CLAIM IS BASED ON SEXUAL ABUSE
BY CLERGY, WORKERS OR OTHER PERSONS OR ENTITIES
ASSOCIATED WITH THE BISHOP OF THE ROMAN CATHOLIC
CHURCH OF THE DIOCESE OF GALLUP**

USE THIS FORM IF YOUR CLAIM IS NOT BASED ON SEXUAL ABUSE

The instructions and definitions below are general explanations of the law. In certain circumstances, such as bankruptcy case not filed voluntarily by a debtor, exceptions to these general rules may apply.

Items to be completed in Proof of Claim form

Court, Name of Debtor, and Case Number:

Fill in the federal judicial district where the bankruptcy case was filed (for example, Central District of California), the debtor's full name, and the case number. If the creditor received a notice of the case from the bankruptcy court, all of this information is at the top of the notice.

Creditor's Name and Address:

Fill in the name of the person or entity asserting a claim and the name and address of the person who should receive notices issued during the bankruptcy case. A separate space is provided for the payment address if it differs from the notice address. The creditor has a continuing obligation to keep the court informed of its current address. See Federal Rule of Bankruptcy Procedure (FRBP) 2002(g).

1. Amount of Claim as of Date Case Filed:

State the total amount owed to the creditor on the date of the bankruptcy filing. Follow the instructions concerning whether to complete items 4 and 5. Check the box if interest or other charges are included in the claim.

2. Basis for Claim:

State the type of debt or how it was incurred. Examples include goods sold, money loaned, services performed, personal injury/wrongful death, car loan, mortgage note, and credit card. If the claim is based on delivering health care good or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information. You may be required to provide additional disclosure if an interested party objects to the claim.

3. Last Four Digits of Any Number by Which Creditor Identifies Debtor:

State only the last four digits of the debtor's account or other number used by the creditor to identify the debtor.

3a. Debtor May Have Scheduled Account As:

Report a change in the creditor's name, a transferred claim, or any other information that clarifies a difference between this proof of claim and the claim as scheduled by the debtor.

3b. Uniform Claim Identifier:

If you use a uniform claim identifier, you may report it here. A uniform claim identifier is an optional 24-character identifier that certain large creditors use to facilitate electronic payment in chapter 13 cases.

4. Secured Claim:

Check whether the claim is fully or partially secured. Skip this section if the

claim is entirely unsecured. (See Definitions.) If the claim is secured, check the box for the nature and value of property that secures the claim, attach copies of lien documentation, and state, as of the date of the bankruptcy filing, the annual interest rate (and whether it is fixed or variable), and the amount past due on the claim.

5. Amount of Claim Entitled to Priority Under 11 U.S.C. § 507(a):

If any portion of the claim falls into any category shown, check the appropriate box(es) and state the amount entitled to priority. (See Definitions.) A claim may be partly priority and partly non-priority. For example, in some of the categories, the law limits the amount entitled to priority.

6. Credits:

An authorized signature on this proof of claim serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

7. Documents:

Attach redacted copies of any documents that show the debt exists and a lien secures the debt. You must also attach copies of documents that evidence perfection of any security interest and documents required by FRBP 3001(c) for claims based on an open-end or revolving consumer credit agreement secured by a security interest in the debtor's principal residence. You may also attach a summary in addition to the documents themselves. FRBP 3001(c) and (d). If the claim is based on delivering health care goods or services, limit disclosing confidential health care information. Do not send original documents, as attachments may be destroyed after scanning.

8. Date and Signature:

The individual completing this proof of claim must sign and date it. FRBP 9011. If the claim is filed electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what constitutes a signature. If you sign this form, you declare under penalty of perjury that the information provided is true and correct to the best of your knowledge, information, and reasonable belief. Your signature is also a certification that the claim meets the requirements of FRBP 9011(b). Whether the claim is filed electronically or in person, if your name is on the signature line, you are responsible for the declaration. Print the name and title, if any, of the creditor or other person authorized to file this claim. State the filer's address and telephone number if it differs from the address given on the top of the form for purposes of receiving notices. If the claim is filed by an authorized agent, provide both the name of the individual filing the claim and the name of the agent. If the authorized agent is a servicer, identify the corporate servicer as the company. Criminal penalties apply for making a false statement on a proof of claim.

DEFINITIONS**INFORMATION****Debtor**

A debtor is the person, corporation, or other entity that has filed a bankruptcy case.

Creditor

A creditor is a person, corporation, or other entity to whom debtor owes a debt that was incurred before the date of the bankruptcy filing. See 11 U.S.C. §101 (10).

Claim

A claim is the creditor's right to receive payment for a debt owed by the debtor on the date of the bankruptcy filing. See 11 U.S.C. §101 (5). A claim may be secured or unsecured.

Proof of Claim

A proof of claim is a form used by the creditor to indicate the amount of the debt owed by the debtor on the date of the bankruptcy filing. The creditor must file the form with the clerk of the same bankruptcy court in which the bankruptcy case was filed.

Secured Claim Under 11 U.S.C. § 506 (a)

A secured claim is one backed by a lien on property of the debtor. The claim is secured so long as the creditor has the right to be paid from the property prior to other creditors. The amount of the secured claim cannot exceed the value of the property. Any amount owed to the creditor in excess of the value of the property is an unsecured claim. Examples of liens on property include a mortgage on real estate or a security interest in a car. A lien may be voluntarily granted by a debtor or may be obtained through a court proceeding. In some states, a court judgment is a lien.

A claim also may be secured if the creditor owes the debtor money (has a right to setoff).

Unsecured Claim

An unsecured claim is one that does not meet the requirements of a secured claim. A claim may be partly unsecured if the amount of the claim exceeds the value of the property on which the creditor has a lien.

Claim Entitled to Priority Under 11 U.S.C. § 507(a)

Priority claims are certain categories of unsecured claims that are paid from the available money or property in a bankruptcy case before other unsecured claims.

Redacted

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. A creditor must show only the last four digits of any social-security, individual's tax-identification, or financial-account number, only the initials of a minor's name, and only the year of any person's date of birth. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information.

Evidence of Perfection

Evidence of perfection may include a mortgage, lien, certificate of title, financing statement, or other document showing that the lien has been filed or recorded.

Acknowledgment of Filing of Claim

To receive acknowledgment of your filing, you may either enclose a stamped self-addressed envelope and a copy of this proof of claim or you may access the court's PACER system (www.pacer.psc.uscourts.gov) for a small fee to view your filed proof of claim.

Offers to Purchase a Claim

Certain entities are in the business of purchasing claims for an amount less than the face value of the claims. One or more of these entities may contact the creditor and offer to purchase the claim. Some of the written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court or the debtor. The creditor has no obligation to sell its claim. However, if the creditor decides to sell its claim, any transfer of such claim is subject to FRBP 3001(e), any applicable provisions of the Bankruptcy Code (11 U.S.C. § 101 *et seq.*), and any applicable orders of the bankruptcy court.

EXHIBIT "D"

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

In re:

BISHOP OF THE ROMAN CATHOLIC
CHURCH OF THE DIOCESE OF GALLUP,
an Arizona corporation sole.

Chapter 11

Case No. 13-13677-t11

NOTICE OF CLAIMS BAR DATE

**THIS IS AN IMPORTANT NOTICE – YOUR RIGHTS MAY BE AFFECTED.
YOU MAY WISH TO CONSULT AN ATTORNEY REGARDING THIS MATTER.**

**NOTICE OF CLAIMS BAR DATE OF _____, 2014
FOR FILING PROOFS OF CLAIM**

TO ANY CREDITORS OF THE DEBTOR IN THE ABOVE-CAPTIONED CASE WHO ARE NOT ASSERTING CLAIMS FOR SEXUAL ABUSE BY A CLERIC, WORKER OR OTHER PERSON OR ENTITY ASSOCIATED WITH THE BISHOP OF THE ROMAN CATHOLIC CHURCH OF THE DIOCESE OF GALLUP:

On _____, 2014, the United States Bankruptcy Court for the District of New Mexico (the “Court”) entered an order (the “Claims Bar Date Order”) in the above-captioned Chapter 11 case setting _____, 2014 (the “Claims Bar Date”) as the last date by which proofs of claim (“Proof of Claim”) may be filed against the Bishop of the Roman Catholic Church of the Diocese of Gallup (the “Arizona Entity” or “Debtor”). **The Claims Bar Date applies to all Entities (as defined below) including Governmental Units (as defined below).**

KEY DEFINITIONS

As used in this Notice, the term “Claim” or “claim” shall mean, as to or against the Debtor and in accordance with Section 101(5), 11 U.S.C. §§ 101 et seq. (the “Bankruptcy Code”): (A) right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (B) right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured.

As used in this Notice, the term “Entity” has the meaning given to it in Section 101(15) of the Bankruptcy Code, and includes person, estate, trust, governmental unit and the United States trustee.

As used in this Notice, the term “Governmental Unit” has the meaning given to it in Section 101(27) of the Bankruptcy Code and includes the United States; State; Commonwealth; District; Territory; municipality; foreign state; department, agency or instrumentality of the United States (but not a United States trustee while serving as a trustee under the Bankruptcy Code).

WHO MUST FILE A PROOF OF CLAIM AND THE DEADLINE TO FILE

1. Claims Bar Date. If you assert a claim against or interest in the Debtor, to preserve your right to be treated as a creditor or interest holder with respect to such claim or interest, for the purposes of voting and distribution, you must file a Proof of Claim by _____, **2014** in the following circumstances:

- (i) If your claim or interest has not been listed in the Debtor’s bankruptcy schedules (“Schedules”);
- (ii) If you disagree with the amount of the claim or interest set forth in the Schedules;
- (iii) If the Debtor scheduled your claim as disputed, contingent and/or unliquidated;
- (iv) To preserve an unsecured deficiency claim if such claim is not scheduled or is scheduled as disputed, contingent, and/or unliquidated;
- (v) If you believe your claim is entitled to priority under the Bankruptcy Code, and the Debtor did not so schedule your claim.

Any Proof of Claim or Interest timely filed by a creditor or interest holder will supersede any scheduled claim or interest. If your claim is scheduled as disputed, contingent, and/or unliquidated, the Debtor is required to so notify you.

2. Claims Bar Date for Governmental Units. If you are a governmental unit, the last day for filing proofs of claim is the later of: (i) the Claims Bar Date; or, (ii) one hundred eighty (180) days after the date of the order of relief.

3. Claims Filed After Amended Schedules Are Filed. If the Debtor amends the Schedules and the amendment reduces the liquidated amount of a scheduled claim or reclassifies a scheduled undisputed, liquidated, and non-contingent claim to a disputed, unliquidated, and/or contingent claim, then the claimant affected by such amendment shall be permitted to file proof of such claim only on or before the later of: (i) the Claims Bar Date; or, (ii) thirty (30) days after the mailing of notice of such amendment to such claimant with a copy of this Notice, but only to the extent such Proof of Claim, if filed after the Claims Bar Date, does not exceed the amount scheduled for such claim prior to such amendment. This extended claims bar date does not apply if an amendment to the Schedules increases the claim deemed filed under 11 U.S.C. § 1111(a) or if the creditor previously filed a Proof of Claim before the Claims Bar Date.

4. Claims Arising from Rejection of a Contract or Lease or Avoidance of a Transfer. The last day for filing proofs of claim arising from the rejection of an executory contract or unexpired lease, and/or the recovery of a voidable transfer, pursuant to Bankruptcy Code §§ 502(g) and 502(h) respectively, is the later of: (i) the Claims Bar Date; or (ii) thirty (30) days after the mailing to the claimant of notice of entry of an order approving the rejection of such executory contract or unexpired lease, or the avoidance of such transfer, with a copy of this Notice.

CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM

If you are required but fail to file a Proof of Claim or Interest timely, and your claim or interest is not scheduled, is scheduled for \$0.00, or is scheduled as disputed, contingent or unliquidated in the Schedules, with very limited exceptions: (a) your claim or interest will be barred, and you will not participate in the Debtor's estate or receive any distribution under any plan or plans of reorganization filed in this Chapter 11 case; (b) you shall be forever barred from voting with respect to any such plan or plans of reorganization; and (c) you shall be bound by the terms of any such plan or plans of reorganization, if confirmed by the Court.

RESPONSIBILITY TO REVIEW THE SCHEDULES

You are responsible for determining that your claim or interest, including its amount, is accurately scheduled by the Debtor. This determination may be made by: (a) reviewing the Schedules online using a CM/ECF or PACER account; (b) reviewing the Schedules in the Office of the Clerk, 10th Floor, Dennis Chavez Federal Building and United States Courthouse, 500 Gold Avenue SW, Albuquerque, New Mexico, between 8:30 am and 4:30 pm; or (c) by contacting the Debtor's attorney: Susan G. Boswell, Quarles & Brady LLP, One S. Church Ave., Suite 1700, Tucson, AZ 85701, (520) 770-8700.

PREVIOUSLY FILED CLAIMS

Creditors who have already filed Proofs of Claims or Interests need not file them again.

CALCULATION OF TIME

Pursuant to Bankruptcy Rule 9006(f), three (3) days will be added to the thirty (30) day deadlines set forth in paragraphs 3 and 4 above and three (3) days will not be added to the deadline set forth in paragraphs 1 or 2. However, if any deadline falls on a weekend or legal holiday, the deadline shall be the next business day.

PROCEDURE FOR FILING PROOFS OF CLAIM

If you wish to assert a Claim, you are required to use the Form that has been approved by the Bankruptcy Court for use by creditors who are **not** asserting claims based upon sexual abuse (the "Other Creditor Proof of Claim Form"). If you did not receive the Other Creditor Proof of Claim Form with this Notice, it can be downloaded from the Arizona Entity's website at www.dioceseofgallup.org and follow the link on the homepage. If you need additional

information regarding the Other Creditor Proof of Claim Form or other matters associated with the Claims Bar Date, you can also call Elizabeth Fella, one of the Arizona Entity's attorneys, at 520-770-8755; however, please note that Ms. Fella **cannot give you legal advice**. Failure to use the Other Creditor Proof of Claim Form to assert a Claim may lead to such Claim being barred even if it was otherwise properly filed.

If you are a creditor asserting a Claim for sexual abuse by a cleric, worker or other person or entity associated with the Arizona Entity, there is a special Proof of Claim form that you should use which can also be obtained at www.dioceseofgallup.org or by calling toll free at _____.

A signed original of a completed Other Creditor Proof of Claim Form, together with any accompanying or supporting documentation, if not filed electronically, must be delivered by hand delivery, United States Mail or other delivery means to the address below so as to be received no later than _____, **2014**.

A signed completed Other Creditor Proof of Claim Form, together with any accompanying or support documentation, must be filed electronically, submitted in person or by courier service, hand delivery or mail addressed to the Clerk of the Court at the following address:

Clerk's Office
The United States Bankruptcy Court
District of New Mexico
P.O. Box 546
Albuquerque, NM 87103

Proofs of Claim submitted by facsimile or e-mail (other than electronic filing in accordance with electronic filing procedures) will not be accepted and will not be deemed filed until the Proof of Claim is submitted by one of the methods described in the foregoing sentence. Proofs of Claim will be deemed filed only when actually received by the Clerk of the Court. If you wish to receive acknowledgement of the Court's receipt of your Proof of Claim, you must also submit, by the Claims Bar Date and concurrently with submitting your original Proof of Claim, (a) a copy of your original Proof of Claim and (b) a self-addressed, stamped return envelope. Other Creditor Proof of Claim Forms must include all documentation required by Federal Rules of Bankruptcy Procedure 3001(c) and 3001(d) and the Other Creditor Proof of Claim Form, including a copy of any written document that forms the basis of the Claim.

(Please Note: If you are going to personally deliver the Other Creditor Proof of Claim Form to the Clerk's office or have someone deliver it on your behalf, the filing window is only open on Court days until 4:30 p.m. Mountain time, and you may need to arrive at the Clerk's office by 3:00 p.m. due to wait times in order for your Proof of Claim to be timely filed. The street address for hand delivery is: Office of the Clerk, 10th Floor, Dennis Chavez Federal Building and United States Courthouse, 500 Gold Avenue SW, Albuquerque, New Mexico.)

YOU MAY WISH TO CONSULT AN ATTORNEY REGARDING THIS MATTER.

DATED this ____ day of _____, 2014.

/s/

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
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

Counsel for Debtor

CERTIFICATE OF SERVICE

The undersigned certifies that on _____, a copy of this “Notice of Claims Bar Date” was served by United States first class mail on all parties on the official mailing list maintained by the Clerk of the Bankruptcy Court for this case, all at their addresses on such mailing list [*and to, insert if applicable*].

Susan G. Boswell

EXHIBIT "E"

**DO NOT USE THIS FORM IF YOUR CLAIM IS BASED ON SEXUAL ABUSE BY CLERGY,
WORKERS OR OTHER PERSONS OR ENTITIES ASSOCIATED WITH
THE ROMAN CATHOLIC CHURCH OF THE DIOCESE OF GALLUP**

UNITED STATES BANKRUPTCY COURT		DISTRICT OF NEW MEXICO	PROOF OF CLAIM
Name of Debtor: Roman Catholic Church of the Diocese of Gallup, a New Mexico corporation sole		Case Number: 13-13676-t11	
<i>NOTE: Do not use this form to make a claim for an administrative expense that arises after the bankruptcy filing. You may file a request for payment of an administrative expense according to 11 U.S.C. §503.</i>			
Name of Creditor (the person or other entity to whom the debtor owes money or property):		COURT USE ONLY	
Name and address where notices should be sent:		<input type="checkbox"/> Check this box if this claim amends a previously filed claim. Court Claim Number: _____ <i>(If known)</i> Filed on: _____	
Telephone number: _____ email: _____			
Name and address where payment should be sent (if different from above):		<input type="checkbox"/> Check this box if you are aware that anyone else has filed a proof of claim relating to this claim. Attach copy of statement giving particulars.	
Telephone number: _____ email: _____			
1. Amount of Claim as of Date Case Filed: \$ _____ If all or part of the claim is secured, complete item 4. If all or part of the claim is entitled to priority, complete item 5. <input type="checkbox"/> Check this box if the claim includes interest or other charges in addition to the principal amount of claim. Attach a statement that itemizes interest or charges.			
2. Basis for Claim: _____ (See instruction #2)			
3. Last four digits of any number by which creditor identifies debtor: _____		3a. Debtor may have scheduled account as: _____ (See instruction #3a)	3b. Uniform Claim Identifier (optional): _____ (See instruction #3b)
4. Secured Claim (See instruction #4) Check the appropriate box if the claim is secured by a lien on property or a right of setoff, attach required redacted documents, and provide the requested information. Nature of property or right of setoff: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe: Value of Property: \$ _____ Annual Interest Rate ___% <input type="checkbox"/> Fixed or <input type="checkbox"/> Variable (when case was filed)		Amount of arrearage and other charges, as of the time case was filed, included in secured claim, if any: \$ _____ Basis for perfection: _____ Amount of Secured Claim: \$ _____ Amount Unsecured: \$ _____	
5. Amount of Claim Entitled to Priority under 11 U.S.C. §507(a). If any part of the claim falls into one of the following categories, check the box specifying the priority and state the amount.			
<input type="checkbox"/> Domestic support obligations under 11 U.S.C. §507(a)(1)(A) or (a)(1)(B).	<input type="checkbox"/> Wages, salaries, or commissions (up to \$12,475*) earned within 180 days before the case was filed or the debtor's business ceased, whichever is earlier - 11 U.S.C. §507(a)(4).	<input type="checkbox"/> Contributions to an employee benefit plan - 11 U.S.C. §507(a)(5).	
		Amount entitled to priority: \$ _____	
<input type="checkbox"/> Up to \$2,775* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use - 11 U.S.C. §507(a)(7).	<input type="checkbox"/> Taxes or penalties owed to governmental units - 11 U.S.C. §507(a)(8).	<input type="checkbox"/> Other - Specify applicable paragraph of 11 U.S.C. §507(a)(____).	
<i>*Amounts are subject to adjustment on 4/1/16 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.</i>			

6. **Credits:** The amount of all payments on this claim has been credited for the purpose of making this proof of claim. (See instruction #6)

7. **Documents:** Attached are **redacted** copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, security agreements, or, in the case of a claim based on an open-end or revolving consumer credit agreement, a statement providing the information required by FRBP 3001(c)(3)(A). If the claim is secured, box 4 has been completed, and **redacted** copies of documents providing evidence of perfection of a security interest are attached. If the claim is secured by the debtor's principal residence, the Mortgage Proof of Claim Attachment is being filed with this claim. (See instruction #7, and the definition of "redacted")

DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING.

If the documents are not available, please explain:

8. **Signature:** (See instruction #8)

Check the appropriate box.

- I am the creditor.
- I am the creditor's authorized agent.
- I am the trustee, or the debtor, or their authorized agent. (See Bankruptcy Rule 3004.)
- I am a guarantor, surety, indorser, or other codebtor. (See Bankruptcy Rule 3005.)

I declare under penalty of perjury that the information provided in this claim is true and correct to the best of my knowledge, information, and reasonable belief.

Print Name: _____

Title: _____

Company: _____

Address and telephone number (if different from notice address above) : _____ (Signature) _____ (Date)

Telephone number: _____

email: _____

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§152 and 3571.

INSTRUCTIONS FOR PROOF OF CLAIM FORM
(SEE ALSO THE NOTICE OF CLAIMS BAR DATE ACCOMPANYING THIS PROOF OF CLAIM FORM)

**DO NOT USE THIS FORM IF YOUR CLAIM IS BASED ON SEXUAL ABUSE
BY CLERGY, WORKERS OR OTHER PERSONS OR ENTITIES
ASSOCIATED WITH THE ROMAN CATHOLIC CHURCH
OF THE DIOCESE OF GALLUP**

USE THIS FORM IF YOUR CLAIM IS NOT BASED ON SEXUAL ABUSE

The instructions and definitions below are general explanations of the law. In certain circumstances, such as bankruptcy case not filed voluntarily by a debtor, exceptions to these general rules may apply.

Items to be completed in Proof of Claim form

Court, Name of Debtor, and Case Number:

Fill in the federal judicial district where the bankruptcy case was filed (for example, Central District of California), the debtor's full name, and the case number. If the creditor received a notice of the case from the bankruptcy court, all of this information is at the top of the notice.

Creditor's Name and Address:

Fill in the name of the person or entity asserting a claim and the name and address of the person who should receive notices issued during the bankruptcy case. A separate space is provided for the payment address if it differs from the notice address. The creditor has a continuing obligation to keep the court informed of its current address. See Federal Rule of Bankruptcy Procedure (FRBP) 2002(g).

1. Amount of Claim as of Date Case Filed:

State the total amount owed to the creditor on the date of the bankruptcy filing. Follow the instructions concerning whether to complete items 4 and 5. Check the box if interest or other charges are included in the claim.

2. Basis for Claim:

State the type of debt or how it was incurred. Examples include goods sold, money loaned, services performed, personal injury/wrongful death, car loan, mortgage note, and credit card. If the claim is based on delivering health care good or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information. You may be required to provide additional disclosure if an interested party objects to the claim.

3. Last Four Digits of Any Number by Which Creditor Identifies Debtor:

State only the last four digits of the debtor's account or other number used by the creditor to identify the debtor.

3a. Debtor May Have Scheduled Account As:

Report a change in the creditor's name, a transferred claim, or any other information that clarifies a difference between this proof of claim and the claim as scheduled by the debtor.

3b. Uniform Claim Identifier:

If you use a uniform claim identifier, you may report it here. A uniform claim identifier is an optional 24-character identifier that certain large creditors use to facilitate electronic payment in chapter 13 cases.

4. Secured Claim:

Check whether the claim is fully or partially secured. Skip this section if the

claim is entirely unsecured. (See Definitions.) If the claim is secured, check the box for the nature and value of property that secures the claim, attach copies of lien documentation, and state, as of the date of the bankruptcy filing, the annual interest rate (and whether it is fixed or variable), and the amount past due on the claim.

5. Amount of Claim Entitled to Priority Under 11 U.S.C. § 507(a):

If any portion of the claim falls into any category shown, check the appropriate box(es) and state the amount entitled to priority. (See Definitions.) A claim may be partly priority and partly non-priority. For example, in some of the categories, the law limits the amount entitled to priority.

6. Credits:

An authorized signature on this proof of claim serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

7. Documents:

Attach redacted copies of any documents that show the debt exists and a lien secures the debt. You must also attach copies of documents that evidence perfection of any security interest and documents required by FRBP 3001(c) for claims based on an open-end or revolving consumer credit agreement secured by a security interest in the debtor's principal residence. You may also attach a summary in addition to the documents themselves. FRBP 3001(c) and (d). If the claim is based on delivering health care goods or services, limit disclosing confidential health care information. Do not send original documents, as attachments may be destroyed after scanning.

8. Date and Signature:

The individual completing this proof of claim must sign and date it. FRBP 9011. If the claim is filed electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what constitutes a signature. If you sign this form, you declare under penalty of perjury that the information provided is true and correct to the best of your knowledge, information, and reasonable belief. Your signature is also a certification that the claim meets the requirements of FRBP 9011(b). Whether the claim is filed electronically or in person, if your name is on the signature line, you are responsible for the declaration. Print the name and title, if any, of the creditor or other person authorized to file this claim. State the filer's address and telephone number if it differs from the address given on the top of the form for purposes of receiving notices. If the claim is filed by an authorized agent, provide both the name of the individual filing the claim and the name of the agent. If the authorized agent is a servicer, identify the corporate servicer as the company. Criminal penalties apply for making a false statement on a proof of claim.

DEFINITIONS**INFORMATION****Debtor**

A debtor is the person, corporation, or other entity that has filed a bankruptcy case.

Creditor

A creditor is a person, corporation, or other entity to whom debtor owes a debt that was incurred before the date of the bankruptcy filing. See 11 U.S.C. §101 (10).

Claim

A claim is the creditor's right to receive payment for a debt owed by the debtor on the date of the bankruptcy filing. See 11 U.S.C. §101 (5). A claim may be secured or unsecured.

Proof of Claim

A proof of claim is a form used by the creditor to indicate the amount of the debt owed by the debtor on the date of the bankruptcy filing. The creditor must file the form with the clerk of the same bankruptcy court in which the bankruptcy case was filed.

Secured Claim Under 11 U.S.C. § 506 (a)

A secured claim is one backed by a lien on property of the debtor. The claim is secured so long as the creditor has the right to be paid from the property prior to other creditors. The amount of the secured claim cannot exceed the value of the property. Any amount owed to the creditor in excess of the value of the property is an unsecured claim. Examples of liens on property include a mortgage on real estate or a security interest in a car. A lien may be voluntarily granted by a debtor or may be obtained through a court proceeding. In some states, a court judgment is a lien.

A claim also may be secured if the creditor owes the debtor money (has a right to setoff).

Unsecured Claim

An unsecured claim is one that does not meet the requirements of a secured claim. A claim may be partly unsecured if the amount of the claim exceeds the value of the property on which the creditor has a lien.

Claim Entitled to Priority Under 11 U.S.C. § 507(a)

Priority claims are certain categories of unsecured claims that are paid from the available money or property in a bankruptcy case before other unsecured claims.

Redacted

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. A creditor must show only the last four digits of any social-security, individual's tax-identification, or financial-account number, only the initials of a minor's name, and only the year of any person's date of birth. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information.

Evidence of Perfection

Evidence of perfection may include a mortgage, lien, certificate of title, financing statement, or other document showing that the lien has been filed or recorded.

Acknowledgment of Filing of Claim

To receive acknowledgment of your filing, you may either enclose a stamped self-addressed envelope and a copy of this proof of claim or you may access the court's PACER system (www.pacer.psc.uscourts.gov) for a small fee to view your filed proof of claim.

Offers to Purchase a Claim

Certain entities are in the business of purchasing claims for an amount less than the face value of the claims. One or more of these entities may contact the creditor and offer to purchase the claim. Some of the written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court or the debtor. The creditor has no obligation to sell its claim. However, if the creditor decides to sell its claim, any transfer of such claim is subject to FRBP 3001(e), any applicable provisions of the Bankruptcy Code (11 U.S.C. § 101 *et seq.*), and any applicable orders of the bankruptcy court.

EXHIBIT "F"

**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 CLAIMS BAR DATE

**THIS IS AN IMPORTANT NOTICE – YOUR RIGHTS MAY BE AFFECTED
YOU MAY WISH TO CONSULT AN ATTORNEY REGARDING THIS MATTER.**

**NOTICE OF CLAIMS BAR DATE OF _____, 2014
FOR FILING PROOFS OF CLAIM**

**TO ANY CREDITORS OF THE DEBTOR IN THE ABOVE-CAPTIONED CASE WHO
ARE NOT ASSERTING CLAIMS FOR SEXUAL ABUSE BY A CLERIC, WORKER OR
OTHER PERSON OR ENTITY ASSOCIATED WITH THE ROMAN CATHOLIC
CHURCH OF THE DIOCESE OF GALLUP:**

On _____, 2014, the United States Bankruptcy Court for the District of New Mexico (the “Court”) entered an order (the “Claims Bar Date Order”) in the above-captioned Chapter 11 case setting _____, 2014 (the “Claims Bar Date”) as the last date by which proofs of claim (“Proof of Claim”) may be filed against the Roman Catholic Church of the Diocese of Gallup (“RCCDG” or “Debtor”). **The Claims Bar Date applies to all Entities (as defined below) including Governmental Units (as defined below).**

KEY DEFINITIONS

As used in this Notice, the term “Claim” or “claim” shall mean, as to or against the Debtor and in accordance with Section 101(5), 11 U.S.C. §§ 101 et seq. (the “Bankruptcy Code”): (A) right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured, or unsecured; or (B) right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured, or unsecured.

As used in this Notice, the term “Entity” has the meaning given to it in Section 101(15) of the Bankruptcy Code, and includes person, estate, trust, governmental unit and the United States trustee.

As used in this Notice, the term “Governmental Unit” has the meaning given to it in Section 101(27) of the Bankruptcy Code and includes the United States; State; Commonwealth; District; Territory; municipality; foreign state; department, agency or instrumentality of the United States (but not a United States trustee while serving as a trustee under the Bankruptcy Code).

WHO MUST FILE A PROOF OF CLAIM AND THE DEADLINE TO FILE

1. Claims Bar Date. If you assert a claim against or interest in the Debtor, to preserve your right to be treated as a creditor or interest holder with respect to such claim or interest, for the purposes of voting and distribution, you must file a Proof of Claim by _____, **2014** in the following circumstances:

- (i) If your claim or interest has not been listed in the Debtor’s bankruptcy schedules (“Schedules”);
- (ii) If you disagree with the amount of the claim or interest set forth in the Schedules;
- (iii) If the Debtor scheduled your claim as disputed, contingent and/or unliquidated;
- (iv) To preserve an unsecured deficiency claim if such claim is not scheduled or is scheduled as disputed, contingent, and/or unliquidated;
- (v) If you believe your claim is entitled to priority under the Bankruptcy Code, and the Debtor did not so schedule your claim.

Any Proof of Claim or Interest timely filed by a creditor or interest holder will supersede any scheduled claim or interest. If your claim is scheduled as disputed, contingent, and/or unliquidated, the Debtor is required to so notify you.

2. Claims Bar Date for Governmental Units. If you are a governmental unit, the last day for filing proofs of claim is the later of: (i) the Claims Bar Date; or, (ii) one hundred eighty (180) days after the date of the order of relief.

3. Claims Filed After Amended Schedules Are Filed. If the Debtor amends the Schedules and the amendment reduces the liquidated amount of a scheduled claim or reclassifies a scheduled undisputed, liquidated, and non-contingent claim to a disputed, unliquidated, and/or contingent claim, then the claimant affected by such amendment shall be permitted to file proof of such claim only on or before the later of: (i) the Claims Bar Date; or, (ii) thirty (30) days after the mailing of notice of such amendment to such claimant with a copy of this Notice, but only to the extent such Proof of Claim, if filed after the Claims Bar Date, does not exceed the amount scheduled for such claim prior to such amendment. This extended claims bar date does not apply if an amendment to the Schedules increases the claim deemed filed under 11 U.S.C. § 1111(a) or if the creditor previously filed a Proof of Claim before the Claims Bar Date.

4. Claims Arising from Rejection of a Contract or Lease or Avoidance of a Transfer. The last day for filing proofs of claim arising from the rejection of an executory contract or unexpired lease, and/or the recovery of a voidable transfer, pursuant to Bankruptcy Code §§ 502(g) and 502(h) respectively, is the later of: (i) the Claims Bar Date; or (ii) thirty (30) days after the mailing to the claimant of notice of entry of an order approving the rejection of such executory contract or unexpired lease, or the avoidance of such transfer, with a copy of this Notice.

CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM

If you are required but fail to file a Proof of Claim or Interest timely, and your claim or interest is not scheduled, is scheduled for \$0.00, or is scheduled as disputed, contingent or unliquidated in the Schedules, with very limited exceptions: (a) your claim or interest will be barred, and you will not participate in the Debtor's estate or receive any distribution under any plan or plans of reorganization filed in this Chapter 11 case; (b) you shall be forever barred from voting with respect to any such plan or plans of reorganization; and (c) you shall be bound by the terms of any such plan or plans of reorganization, if confirmed by the Court.

RESPONSIBILITY TO REVIEW THE SCHEDULES

You are responsible for determining that your claim or interest, including its amount, is accurately scheduled by the Debtor. This determination may be made by: (a) reviewing the Schedules online using a CM/ECF or PACER account; (b) reviewing the Schedules in the Office of the Clerk, 10th Floor, Dennis Chavez Federal Building and United States Courthouse, 500 Gold Avenue SW, Albuquerque, New Mexico, between 8:30 am and 4:30 pm; or (c) by contacting the Debtor's attorney: Susan G. Boswell, Quarles & Brady LLP, One S. Church Ave., Suite 1700, Tucson, AZ 85701, (520) 770-8700.

PREVIOUSLY FILED CLAIMS

Creditors who have already filed Proofs of Claims or interests need not file them again.

CALCULATION OF TIME

Pursuant to Bankruptcy Rule 9006(f), three (3) days will be added to the thirty (30) day deadlines set forth in paragraphs 3 and 4 above, but three (3) days will not be added to the deadline set forth in paragraphs 1 or 2. However, if any deadline falls on a weekend or legal holiday, the deadline shall be the next business day.

PROCEDURE FOR FILING PROOFS OF CLAIM

If you wish to assert a Claim, you are required to use the Form that has been approved by the Bankruptcy Court for use by creditors who are **not** asserting claims based upon sexual abuse (the "Other Creditor Proof of Claim Form"). If you did not receive the Other Creditor Proof of Claim Form with this Notice, it can be downloaded from RCCDG's website at www.dioceseofgallup.org and follow the link on the homepage. If you need additional

information regarding the Other Creditor Proof of Claim Form or other matters associated with the Claims Bar Date, you can also call Elizabeth Fella, one of RCCDG's attorneys, at 520-770-8755; however, please note that Ms. Fella **cannot give you legal advice**. Failure to use the Other Creditor Proof of Claim Form to assert a Claim may lead to such Claim being barred even if it was otherwise properly filed.

If you are a creditor asserting a Claim for sexual abuse by a cleric, worker or other person or entity associated with RCCDG, there is a special Proof of Claim form that you should use which can also be obtained at www.dioceseofgallup.org or by calling toll free at _____.

A signed original of a completed Other Creditor Proof of Claim Form, together with any accompanying or supporting documentation, if not filed electronically, must be delivered by hand delivery, United States Mail or other delivery means to the address below so as to be received no later than _____, **2014**.

A signed completed Other Creditor Proof of Claim Form, together with any accompanying or support documentation, must be filed electronically, submitted in person or by courier service, hand delivery or mail addressed to the Clerk of the Court at the following address:

Clerk's Office
The United States Bankruptcy Court
District of New Mexico
P.O. Box 546
Albuquerque, NM 87103

Proofs of Claim submitted by facsimile or e-mail (other than electronic filing in accordance with electronic filing procedures) will not be accepted and will not be deemed filed until the Proof of Claim is submitted by one of the methods described in the foregoing sentence. Proofs of Claim will be deemed filed only when actually received by the Clerk of the Court. If you wish to receive acknowledgement of the Court's receipt of your Proof of Claim, you must also submit, by the Claims Bar Date and concurrently with submitting your original Proof of Claim, (a) a copy of your original Proof of Claim and (b) a self-addressed, stamped return envelope. Other Creditor Proof of Claim Forms must include all documentation required by Federal Rules of Bankruptcy Procedure 3001(c) and 3001(d) and the Other Creditor Proof of Claim Form, including a copy of any written document that forms the basis of the Claim.

(Please Note: If you are going to personally deliver the Other Creditor Proof of Claim Form to the Clerk's office or have someone deliver it on your behalf, the filing window is only open on Court days until 4:30 p.m. Mountain time, and you may need to arrive at the Clerk's office by 3:00 p.m. due to wait times in order for your Proof of Claim to be timely filed. The street address for hand delivery is: Office of the Clerk, 10th Floor, Dennis Chavez Federal Building and United States Courthouse, 500 Gold Avenue SW, Albuquerque, New Mexico.)

YOU MAY WISH TO CONSULT AN ATTORNEY REGARDING THIS MATTER.

DATED this ____ day of _____, 2014.

/s/

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
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

Counsel for Debtor

CERTIFICATE OF SERVICE

The undersigned certifies that on _____, a copy of this “Notice of Claims Bar Date” was served by United States first class mail on all parties on the official mailing list maintained by the Clerk of the Bankruptcy Court for this case, all at their addresses on such mailing list [*and to, insert if applicable*].

Susan G. Boswell

EXHIBIT "G"

**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 DISPUTED, CONTINGENT, OR UNLIQUIDATED CLAIM
AND NOTICE OF DEADLINE FOR FILING PROOF OF CLAIM**

To: ALL CLAIMANTS LISTED ON ATTACHED SCHEDULE 1

The Debtor scheduled your claim as Disputed, Contingent, and/or Unliquidated, as indicated on SCHEDULE 1, attached.

Any creditor whose claim is not scheduled or whose claim is scheduled as disputed, contingent, or unliquidated in the schedules filed by the Debtor must file a proof of claim by _____, 2014. Any creditor required to file a proof of claim who fails to do so shall not be treated as a creditor with respect to such a claim for the purposes of voting and distribution.

Creditors who have already filed claims need not file them again.

A Proof of Claim form is enclosed with this notice.

DATED this ____ day of _____, 2014.

/s/

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
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

Counsel for Debtor

CERTIFICATE OF SERVICE

The undersigned certifies that on _____, 2014, a copy of the foregoing “Notice of Disputed, Contingent, or Unliquidated Claim and Notice of Deadline for Filing Proof of Claim” was served by United States first class mail on the parties listed above, at the addresses shown.

Susan G. Boswell

SCHEDULE 1

Name and Address of Creditor	Amount of Scheduled Claim	Claim Scheduled as:
(to be completed upon court approval of form, prior to mailing)		

EXHIBIT "H"

PUBLICATION NOTICE
(“Posted Notice”)

THE CIVIL CORPORATIONS OF THE DIOCESE OF GALLUP, ROMAN CATHOLIC CHURCH OF THE DIOCESE OF GALLUP AND THE BISHOP OF THE ROMAN CATHOLIC CHURCH OF THE DIOCESE OF GALLUP WHICH ARE COMMONLY REFERRED TO AS THE DIOCESE OF GALLUP HAVE FILED FOR REORGANIZATION IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF NEW MEXICO. IF YOU WERE ABUSED OR SUFFERED INJURY BY CLERGY OR OTHER PERSONS WORKING FOR THE DIOCESE OF GALLUP OR FOR A CATHOLIC PARISH, SCHOOL OR MISSION WITHIN THE TERRITORY OF THE DIOCESE OF GALLUP AND YOU CONTEND THE DIOCESE OF GALLUP IS RESPONSIBLE, YOU MUST ACT NOW TO FILE YOUR CLAIM THE LAST DAY TO FILE CLAIMS IS _____, 2014.

PARA ESPANOL LLAME...
FOR DINE/NAVAJO...

The United States Bankruptcy Court has ordered that all persons claiming injury against the Diocese of Gallup for acts of sexual abuse must file a claim **on or before _____, 2014.**

YOU MUST COMPLETE A PROOF OF CLAIM IF YOU CONTEND THAT THE DIOCESE OF GALLUP IS RESPONSIBLE FOR ANY INJURY OR OTHER DAMAGES CAUSED TO YOU BECAUSE YOU CLAIM THAT YOU WERE SEXUALLY ABUSED, WHETHER (1) BY A PRIEST, A NUN, A WORKER, A VOLUNTEER, AN EMPLOYEE OR OTHER PERSON OR ENTITY ASSOCIATED WITH THE DIOCESE OF GALLUP, OR ASSOCIATED WITH A PARISH, SCHOOL OR MISSION WITHIN THE TERRITORY OF THE DIOCESE OF GALLUP; OR (2) THROUGH ACTS THAT OCCURRED BEYOND THE TERRITORY OF THE DIOCESE OF GALLUP FOR WHICH YOU CLAIM THE DIOCESE OF GALLUP IS RESPONSIBLE.

For additional information or to obtain a proof of claim form please call toll free in the United States at _____, or go to the Diocese of Gallup website at <http://www.dioceseofgallup.org>. You can also download the forms from and follow the directions to the link on the website.

EXHIBIT "I"

EXHIBIT “I”

I. LIST OF RADIO STATIONS AND PUBLICATIONS IN WHICH DEBTORS PROPOSE¹ TO GIVE NOTICE OF CLAIMS BAR DATE, AND LIST OF LOCATIONS WHERE THE DEBTORS WILL REQUEST POSTING OF THE “NOTICE AND INSTRUCTIONS OF CONFIDENTIAL CLAIMS BAR DATE”

Publication Name	Geographic Area	Proposed Publication Schedule²	PSA or Paid Ad³
El Paso Times	El Paso, TX	3 Sundays	Paid Ad
Weekly Alibi	Albuquerque, NM	3 Sundays	Paid Ad
Albuquerque Journal	Albuquerque, NM	1 Sunday ⁴	Paid Ad
Albuquerque Journal	Albuquerque, NM		PSA
Navajo Times	Four Corners area	3 Thursdays	Paid Ad
Cibola Beacon	Cibola County, NM	3 Fridays	Paid Ad
Gallup Journey	Gallup, NM	1 weekly issue	Paid Ad
Gallup Journey	Gallup, NM		PSA
Gallup Independent	Gallup, NM	3 Sundays	Paid Ad
Santa Fe New Mexican	Santa Fe, NM	3 Sundays	Paid Ad
Taos News	Taos, NM	3 Thursdays	Paid Ad
Sangre de Cristo Chronicle	Northern NM area	3 Thursdays	Paid Ad
Las Cruces Sun News	Las Cruces, NM	1 Sunday	Paid Ad
Las Cruces Sun News	Las Cruces, NM		PSA
Alamogordo Daily News	Alamogordo, NM	3 Sundays	Paid Ad
Deming Headlight	Deming, NM	3 Sundays	Paid Ad
Silver City Sun News	Silver City, NM	3 Sundays	Paid Ad

¹ The Debtors will make their best efforts to publish the Posted Notice and/or Press Release in each of the proposed publications and broadcast stations listed in this Exhibit, using the proposed publication and broadcast schedules listed in this Exhibit. Such proposed schedules represent a minimum proposed schedule that the Debtors believe they can achieve based on pricing and other logistics given by the various media outlets. To the extent the Debtors are able to secure better pricing, they may publish or broadcast more often than the schedule set forth herein. However, to the extent unforeseen circumstances may arise that preclude the Debtors from publishing or broadcasting as proposed, the Debtors reserve the right to substitute or eliminate publications or broadcast stations.

² Publishing will be “front loaded” - in other words, for newspapers in which Debtors propose to publish three times, the Debtors will publish once a week for the first two (2) weeks after entry of the Order approving this Motion, then again in a final publication on the date that is on, or nearest in time before, the date that is three weeks prior to the Bar Date.

³ The PSA will be the Press Release, and the Paid Ad will be the Posted Notice, as indicated in the Motion.

⁴ For publications in which the Debtor intends to publish the Posted Notice only once due to prohibitive cost, the publication will occur in the first week after entry of the Order approving this Motion, or as soon thereafter as the publication is able to run the Posted Notice. The Debtor is also requesting that the publication run the Press Release as a PSA, although whether to do so is in the publication’s discretion.

Farmington Daily Times	Farmington, NM	3 Sundays	Paid Ad
Voice of the Southwest	Diocese of Gallup area	All issues published between the dates that begin on the entry of bar date order and end on the bar date	Paid Ad
People of God	Archdiocese of Santa Fe area	1 issue	Paid Ad
The Catholic Sun	Phoenix Diocese area	1 Thursday	Paid Ad
White Mountain Independent	White Mountain area (Show Low, Pinetop, Springerville, AZ)	3 Fridays	Paid Ad
Lake Powell Chronicle	Lake Powell, AZ	3 Wednesdays	Paid Ad
Arizona Journal	Navajo County, AZ	3 Wednesdays	Paid Ad
Arizona Daily Sun	Flagstaff, AZ	1 Sunday	Paid Ad
Arizona Daily Sun	Flagstaff, AZ		PSA
Arizona Republic	Phoenix, AZ	1 Sunday	Paid Ad
Arizona Republic	Phoenix, AZ		PSA
Navajo-Hopi Observer	Flagstaff and Winslow, AZ	3 Wednesdays	Paid Ad
Prescott Daily Courier	Prescott, AZ	3 Sundays	Paid Ad
Arizona Daily Star	Tucson, AZ	1 Sunday	Paid Ad
Arizona Daily Star	Tucson, AZ		PSA
Red Rock News	Sedona, AZ	3 Wednesdays	Paid Ad
St. George Spectrum	Four Corners area (UT)	3 Sundays	Paid Ad
Cortez Journal	Four Corners area (CO)	1 Friday	Paid Ad
Cortez Journal	Four Corners area (CO)		PSA
Las Vegas Sun	Las Vegas, NV		PSA
Durango Herald	Durango, CO		PSA
Denver Post	Denver, CO		PSA

English Language Radio Stations	Geographic Area	Proposed PSA or Spot Length and Broadcast Schedule⁵	PSA or Paid Ad
KGLP Public Radio	Gallup, NM		PSA
Millennium	Gallup, NM		PSA
KSLE	Farmington, NM	90 seconds	Paid Ad
KSUT	Four Corners area		PSA
KANW	Albuquerque, NM	90 seconds	Paid Ad

⁵ For paid ads on all radio stations, the Debtors will request that the announcement be made six times: once a day during three weekdays in the first (1st) week after the Claims Bar Date is set and then again once a day for three days in the week that is three (3) weeks prior to the expiration of the Claims Bar Date.

Immaculate Heart	Arizona and New Mexico		PSA
KTEP	El Paso, TX	90 seconds	Paid Ad
KNAU	Flagstaff, AZ	90 seconds	Paid Ad
Arizona Public Media	Arizona	90 seconds	Paid Ad

Navajo Language Radio Stations	Geographic Area	Proposed PSA or Spot Length and Broadcast Schedule	PSA or Paid Ad
KTTN Voice of the Navajo Nation	Navajo Nation/Four Corners area	90 seconds	Paid Ad

Spanish Language Radio Stations	Geographic Area	Proposed PSA or Spot Length and Broadcast Schedule	PSA or Paid Ad
El Gato	El Paso, TX; Las Cruces, NM, Albuquerque, NM; Almagordo, NM; Sierra Blanca; NM	90 seconds	Paid Ad ⁶
La Que Buena	Albuquerque, NM; Santa Fe, NM; Farmington, NM; Las Cruces, NM	90 seconds	Paid Ad ⁷
KASA	Phoenix, AZ	90 seconds	Paid Ad
KCMT or KALZ	Tucson, AZ	90 seconds	Paid Ad

⁶ This radio stations offers free announcements for non-profits upon application. The Debtors will attempt to apply, but if their application is denied by the radio station, they will purchase a paid ad.

⁷ This radio stations offers free announcements for non-profits upon application. The Debtors will attempt to apply, but if their application is denied by the radio station, they will purchase a paid ad.

II. LIST OF LOCATIONS WHERE DEBTORS WILL REQUEST POSTING OF NOTICE AND INSTRUCTIONS OF CONFIDENTIAL CLAIMS BAR DATE⁸

A. Indian Health Services Locations

1. Albuquerque, New Mexico Area
 - a) Acoma-Canoncito-Laguna Service Unit (San Fidel, NM)
 - b) Jicarilla Service Unit (Dulce, NM)
 - c) Mescalero Service Unit (Mescalero, NM)
 - d) Santa Fe Service Unit (Santa Fe, NM)
 - e) Southern Colorado Ute Service Unit (Ignacio, CO)
 - f) Ysleta del Sur Service Unit (El Paso, TX)
 - g) Zuni Indian Hospital (Zuni, NM)
2. Navajo Area (Four Corners - Arizona, New Mexico, Utah, Colorado)
 - a) Navajo Area Indian Health Services (Window Rock, AZ)
3. Phoenix, Arizona Area
 - a) Phoenix Area Indian Health Service (Phoenix, AZ)
4. Tucson, Arizona Area
 - a) Tucson Area Indian Health Service (Tucson)

B. Navajo Chapter Houses

1. Black Mesa, PO Box 97, Pinon, Arizona, 86510
2. Blue Gap-Tachee, PO Box 4427, Blue Gap, Arizona, 86520
3. Chinle, PO Box, 1809 Chinle, Arizona, 86503
4. Forest Lake, PO Box 441, Pinon, Arizona 86510
5. Hardrock, PO Box 20, Kykotsmovi, Arizona 86039
6. Lukachukai, PO Box 248, Lukachukai, Arizona, 86507
7. Many Farms, PO Box 185, Many Farms, Arizona, 86538
8. Nazlini, PO Box 7387, Nazlini, Arizona, 86540
9. Pinon, PO Box 127 Pinon, Arizona, 86510
10. Rough Rock/Tse Ch' Izhi, Box 663-RRDS, Chinle, Arizona, 86503
11. Round Rock, PO Box 10, Round Rock, Arizona, 86547
12. Tsaile-Wheatfields, PO Box 667, Tsaile, Arizona, 86556
13. Tselani-Cottonwood, PO Box 1139, Chinle Arizona, 86503
14. Whippoorwill, PO Box 279, Pinon, Arizona, 86510
15. Alamo, PO Box 827, Magdalena, New Mexico, 87825
16. Baca-Prewitt, PO Box 562, Prewitt, New Mexico, 87045
17. Becenti, PO Box 708, Crownpoint, New Mexico, 87313
18. Breadsprings/Baahaali, PO Box 6118, Gallup, New Mexico, 87305
19. Casamero Lake, PO Box 549, Prewitt, New Mexico, 87045
20. Chichiltah, PO Box 1436, Gallup, New Mexico, 87305
21. Churchrock, PO Box 549, Churchrock, New Mexico, 87311
22. Counselor, PO Box 209, Counselor, New Mexico, 87018
23. Crownpoint/Tsin Ya Nai Kidi, PO Box 336, Crownpoint, New Mexico, 87313
24. Huerfano, PO Box 968, Bloomfield, New Mexico, 87413

⁸ To the extent the Debtors learn of additional locations where posting of the Notice could be effective, the Debtors will post in such additional locations in addition to those set forth on this Exhibit.

25. Iyanbito, PO Box 498, Fort Wingate, New Mexico, 87316
26. Lake Valley, PO Box 190, Crownpoint, New Mexico, 87313
27. Littlewater, PO Box 1898, Crownpoint, New Mexico, 87313
28. Manuelito, HCR 57-Box 9069, Gallup, New Mexico, 87301
29. Mariano, Lake PO Box 164, Smith Lake, New Mexico, 87365
30. Nageezi, PO Box 100, Nageezi, New Mexico, 87037
31. Nahodishgish, PO Box 369, Crownpoint, New Mexico, 87313
32. Ojo Encino, HCR 79 Box 7, Cuba, New Mexico, 87013
33. Pinedale, PO Box 3, Churchrock, New Mexico, 87311
34. Pueblo Pintado, HCR 79 Box 3026, Cuba, New Mexico
35. Ramah, Rt 2, Box 13 Ramah, New Mexico, 87321
36. Red Rock/Tse' Lichii', PO Box 2548, Gallup, New Mexico, 87301
37. Smith Lake, PO Box 60, Smith Lake, New Mexico, 87365
38. Standing Rock-Tse'Ii'Ahi', PO Box 247, Crownpoint, New Mexico, 87313
39. Thoreau, PO Box 899, Thoreau, New Mexico, 87323
40. Tohajiilee, PO Box 3398, Canoncito, New Mexico, 87026
41. Torreon/Star Lake, PO Box 1024, Cuba, New Mexico, 87013
42. Whitehorse Lake, HCR 79 Box 4069, Cuba, New Mexico, 87013
43. Whiterock, PO Box 660, Crownpoint, New Mexico, 87313
44. Rock Springs, PO Box 4608, Yahtahey, New Mexico, 87375
45. Tsayatoh, PO Box 86, Mentmore, New Mexico, 87375
46. Cornfields, PO Box 478, Ganado, Arizona, 86505
47. Coyote Canyon, PO Box 257, Brimhall, New Mexico, 87310
48. Crystal, PO Box 775, Navajo, New Mexico, 87328
49. Dilkon, HR 63 Box E, Winslow, Arizona, 86047
50. Whiterock, PO Box 660, Crownpoint, New Mexico, 87313
51. Rock Springs, PO Box 4608, Yahtahey, New Mexico, 87375
52. Tsayatoh, PO Box 86, Mentmore, New Mexico, 87375
53. Cornfields, PO Box 478, Ganado, Arizona, 86505
54. Coyote Canyon, PO Box 257, Brimhall, New Mexico, 87310
55. Crystal, PO Box 775 Navajo, New Mexico, 87328
56. Dilkon, HR 63 Box E, Winslow, Arizona, 86047
57. Fort Defiance, PO Box 366, Fort Defiance, Arizona, 86504
58. Ganado, PO Box 188, Ganado, Arizona, 86505
59. Greasewood Springs, PO Box 1260, Ganado, Arizona, 86505
60. Houck, PO Box 127, Houck, Arizona
61. Indian Wells, PO Box 3049, Indian Wells, Arizona
62. Jeddito, PO Box 798, Keams Canyon, Arizona, 86034
63. Kinlichee (Kin Dah Lichii), PO Box 860, St. Michael, Arizona, 86511
64. Klagetoh, Unit 42 HC Box 90, Ganado, Arizona, 86505
65. Lupton (Tse Si Ani), PO Box 403, Lupton, Arizona, 86508
66. Mexican Springs, PO Box 689, Tohatchi, New Mexico, 87325
67. Nahata Dziil, PO Box 400, Sanders, Arizona, 86512
68. Naschitti, PO Drawer D, Sheep Springs, New Mexico, 87364
69. Oak Springs, PO Box 486, Window Rock, Arizona, 86515
70. Red Lake #18, PO Box 130, Navajo, New Mexico, 87328

71. Sawmill, PO Box 1786, Ft. Defiance, Arizona, 86504
72. Steamboat, PO Box 117, Ganado, Arizona, 86505
73. St. Michael, PO Box 829, St. Michael, Arizona, 86511
74. Teesto, PO Box 7166, Winslow, Arizona, 86047
75. Tohatchi, PO Box 1236, Tohatchi, New Mexico, 87325
76. Twin Lakes/Bahastl' ah', PO Box 4424, Yahtahey, New Mexico, 87375
77. Whitecone, PO Box 3338, Indian Wells, Arizona, 86031
78. Wide Ruins, PO Box 208, Chambers, Arizona, 86502
79. Low Mountain, PO Box 4407, Blue Gap, Arizona, 86520
80. Aneth, PO Box 430, Montezuma Creek, Utah, 84534
81. T'iistoh Sikaad/Burnham, PO Box 7359, Newcomb, New Mexico, 87455
82. Cove, PO Box 378, Red Valley, Arizona, 86544
83. Gadii ahi/To' Koi, PO Box 1318, Shiprock, New Mexico, 87420
84. Hogback/Tse'Daa Kaan, PO Box 1268, Shiprock, New Mexico, 87420
85. Mexican Water, HC 61 Box 38, Teecnospos, Arizona, 86514
86. Nenahnezad, PO Box 438, Fruitland, New Mexico, 87416
87. Newcomb/Tiis Nideeshgish, PO Box 7982, Newcomb, New Mexico, 87455
88. Red Mesa, PO Box 422, Montezuma Creek, Utah, 84534
89. Red Valley, PO Box 304, Red Valley, Arizona, 86544
90. San Juan, PO Box 1636, Fruitland, New Mexico, 87416
91. Sanostee/Tsealnozt'ii, PO Box 219, Sanostee, New Mexico, 87461
92. Sheepsprings, PO Drawer I Sheepsprings, New Mexico, 87364
93. Shiprock, PO Box 3810, Shiprock, New Mexico, 87420
94. Sweetwater/Tolikan, PO Box 105, Teecnospos, Arizona, 86514
95. Teecnospos, PO Box 106, Teecnospos, Arizona, 86514
96. Toadlena/TwoGreyHills, PO Box 7894, Newcomb, New Mexico, 87455
97. Upper Fruitland, PO Box 1257, Fruitland, New Mexico, 87416
98. Rock Point, PO Box 190, Rock Point, Arizona, 86545
99. Birdsprings/Tsidii To'ii, HC 61, Box K, Winslow Arizona, 86047
100. Bodaway-Gap, PO Box 1546, Tuba City, Arizona, 86045
101. Cameron, PO Box 669, Cameron, Arizona, 86020
102. Chilchinbeto, PO Box 1681, Kayenta, Arizona, 86033
103. Coalmine Canyon PO Box 742, Tuba City, Arizona, 86045
104. Coppermine, PO Box 1323, Page Arizona, 86040
105. Dennehotso, PO Box 2301, Dennehotso, Arizona, 86535
106. Ts'ah Bii Kin/Inscription Hse, PO Box 5214, Tonalea, Arizona, 86044
107. Kaibeto/Kai' Bii To, PO Box 1761, Kaibeto, Arizona, 86053
108. Kayenta, PO Box 1088, Kayenta, Arizona, 86033
109. LeChee, PO Box 4720, Page, Arizona, 86040
110. Leupp, CPO Box 5428, Leupp, Arizona, 86035
111. Navajo Mountain, PO Box 10070, Tonalea, Arizona, 86044
112. Oljato, PO Box 360455, Monument Valley, Utah, 84531
113. Shonto, PO Box 7800, Shonto, Arizona, 86054
114. Tolani Lake, HC61-SR-Box 3001, Winslow, Arizona, 86047
115. Tonalea/Red Lake, PO Box 207, Tonalea, Arizona, 86044
116. To' Nanees' Dizi', PO Box 727, Tuba City, Arizona, 86045

C. Other Native American Cultural Centers

1. White Mountain Apache Culture Center and Museum: Fort Apache, AZ
2. Pueblo of Zuni: Zuni, NM
3. Pueblo Cultural Center: Albuquerque, NM

D. Post Offices

1. The Diocese will request that all post offices in rural and/or remote locations within the current and former geographic area of the Diocese of Gallup, and, as part of the “Motion for an Order Fixing Time for Filing Proofs of Claim, Approving Claim Forms, and Approving Manner and Form of Notice,” has requested the Court to order such posting.

E. Parishes and Missions

1. Diocese of Gallup
2. Diocese of Phoenix
3. Diocese of Las Cruces
4. Archdiocese of Santa Fe

EXHIBIT "J"

PRESS RELEASE

(Public Service Announcement)

The United States Bankruptcy Court for the District of New Mexico ordered that all persons claiming injury against the Roman Catholic Church of the Diocese of Gallup or the Bishop of the Roman Catholic Church of the Diocese of Gallup, commonly known as the Diocese of Gallup, for acts of sexual abuse must file a claim with the Bankruptcy Court so that it is received by the Court on or before _____, 2014.

The Court's order requires a person to file a claim with the Bankruptcy Court in order to be considered for compensation, if they believe the Diocese of Gallup is responsible for any injury or other damages to them because they claim that they were sexually abused, whether (1) by a priest, a nun, a worker, a volunteer, an employee or other person or entity associated with the Diocese of Gallup, or associated with a parish, school, or mission within the territory of the Diocese of Gallup; or (2) through acts that occurred beyond the geographic territory of the Diocese of Gallup for which they claim that the Diocese of Gallup is responsible.

Persons who desire to obtain additional information or to obtain a claim form may visit <http://www.dioceseofgallup.org> and click on the link to the bankruptcy forms and instructions. Or, they can telephone the Official Committee of Creditors, which has set up a toll free hotline, at _____. Translators for Spanish and Navajo speakers are available.

Persons who believe they have claims for compensation against the Diocese of Gallup may forever lose their ability to assert their claims if they fail to submit a claim to the Bankruptcy Court so that it is received on or before _____, 2014.

EXHIBIT "K"

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

<p>In re:</p> <p>ROMAN CATHOLIC CHURCH OF THE DIOCESE OF GALLUP, a New Mexico corporation sole,</p> <hr style="width: 80%; margin-left: auto; margin-right: auto;"/> <p style="text-align: center;">Debtor.</p>	<p>Chapter 11</p> <p>Case No. 13-13676-t11</p> <p>Jointly Administered with:</p>
<p>Jointly Administered with:</p> <p>BISHOP OF THE ROMAN CATHOLIC CHURCH OF THE DIOCESE OF GALLUP, an Arizona corporation sole.</p> <p>This pleading applies to:</p> <p><input checked="" type="checkbox"/> All Debtors. <input type="checkbox"/> Specified Debtor.</p>	<p>Case No. 13-13677-t11</p>

**ORDER FIXING TIME FOR FILING PROOFS OF CLAIM, APPROVING CLAIM
FORMS, AND APPROVING MANNER AND FORM OF NOTICE**

This matter came before the Court on the “Motion for an Order Fixing Time for Filing Proofs of Claim, Approving Claim Forms, and Approving Manner and Form of Notice” (the “**Motion**”) filed by the Roman Catholic Church of the Diocese of Gallup (“**RCCDG**”) and Bishop of the Roman Catholic Church of the Diocese of Gallup (the “**Arizona Entity**,” and together with RCCDG, the “**Debtors**”) on _____, 2014 at Docket No. _____. Based upon the Motion, the exhibits thereto, the arguments and statements of counsel and the representations made on the record at the hearing on this matter on _____, 2014, and the entire record before the Court in this matter; it appearing that the Court has jurisdiction over this matter; and it appearing that due notice of the Motion as set forth in the “Certificate of Service” attached thereto is sufficient under the circumstances, and that no other or further notice need be provided; the relief therein requested being in the best interest of the estate;

IT IS HEREBY ORDERED that:

A. The Motion is approved on the terms set forth in this Order;

B. The Claims Bar Date¹ for filing Proofs of Claim shall be one hundred twenty (120) days from the date of service of the Bar Date Order and related pleadings, which service the Debtor shall complete within ten (10) days after entry of this Order;

C. The following forms attached as Exhibits “A” through “H,” and Exhibit “J” to the Motion are hereby approved for use and dissemination by the Debtors:

1. The Tort Claim Form
2. Notice and Instructions of Confidential Claims Bar Date
3. Arizona Entity Other Claims Form
4. Arizona Entity Notice of Claims Bar Date
5. RCCDG Other Claims Form
6. RCCDG Notice of Claims Bar Date
7. RCCDG Notice of Disputed, Contingent, or Unliquidated Claim
8. Posted Notice
9. Press Release

D. The Debtors are authorized to make nonmaterial changes to the above-named forms.

E. The proposed noticing methods and places set forth in the Motion and Exhibit “I” to the Motion and the Debtors’ substantial compliance with the proposed noticing methods and places to the extent such noticing is within the control of the Debtors, provide good and adequate notice under the circumstances of these Reorganization Cases;

¹ Terms not defined in this Order have the meaning given to them in the Motion.

F. Any post office or other federal office shall display the Posted Notice in a public place at the Debtors' request, from the date the Posted Notice is received by the office until the Claims Bar Date;

G. Any creditor (including any Tort Claimant) who fails to timely file a Tort Claim Form or Other Claims Form on or before the Claims Bar Date may be prohibited from participating in the Reorganization Cases with respect to voting on a plan of reorganization, distribution under a plan of reorganization, or in any other regard;

H. Any creditor's (including any Tort Claimant's) claim that is untimely filed (or any creditor who fails to file a Tort Claim Form or Other Claims Form at all) may have such claim discharged;

I. Any creditor filing an Other Claims Form against either or both of the Debtors must file the proof of claim in the estate(s) of the Debtor(s) which is obligated on its claim only. In the event there is joint and several liability on a claim between the Debtors, the details of the liability shall be clearly stated, and the Other Claims Form shall be filed in BOTH cases;

J. The failure of a Tort Claimant to indicate the Debtor against whom he or she is asserting a Tort Claim shall not have such Tort Claim disallowed nor shall it be grounds for objection to such Tort Claim if such Tort Claimant fails to identify the Debtor against whom such Tort Claimant is asserting his or her Tort Claim;

K. The Tort Claim Forms shall be mailed or hand delivered to the Clerk of the Court so that the Tort Claim Form is received by the Clerk no later than 5:00 p.m., on or before the Claims Bar Date;

L. The Tort Claim Forms shall be filed under seal in hard copy and kept under seal in hard copy by the Clerk of the Court in the jointly administered case until liability against one

Debtor or the other is determined, in accordance with a confidentiality procedure to be agreed upon between the Debtors and the Committee, as ordered by the Court;

M. The Clerk of the Court is hereby directed to provide a copy of all filed Tort Claim Forms to counsel for the Debtors in accordance with a procedure to be agreed upon between counsel for the Debtors and the Clerk of the Court;

N. The bar date for claims concerning executory contracts or unexpired leases, and avoidance actions shall be the later of: (i) the Claims Bar Date; or, (ii) thirty (30) days after the mailing to the claimant of notice of entry of an order approving the rejection of such executory contract or unexpired lease, or the avoidance of such transfer, with a copy of the appropriate Notice of Claims Bar Date;

O. The bar date for claims of governmental units shall be set for the later of: (i) the Claims Bar Date; or, (ii) one hundred eighty (180) days after the date of order for relief;

P. If the Debtors amend their bankruptcy schedules and the amendment reduces the liquidated amount of a scheduled claim, or reclassify a claim scheduled as undisputed, liquidated, and non-contingent to a disputed, unliquidated, and/or contingent claim, then each claimant affected by such amendment shall be permitted to file the Tort Claim Form or Other Claims Form relating to such claim on or before the later of: (i) the Claims Bar Date; or, (ii) thirty (30) days after the mailing of notice of such amendment to such claimant with a copy of the Bar Date Notice AND the Disputed Claim Notice, but only to the extent such claim does not exceed the amount scheduled for such claim prior to such amendment. This extended claims bar date shall not apply if an amendment to the Schedules increases the claim deemed filed under 11 U.S.C. § 1111(a) or if the creditor previously filed a Tort Claim Form or Other Claims Form on or before the Claims Bar Date;

Q. The Claims Bar Date shall not apply to any particular types of pre-petition claims that the Court specifically authorizes to be paid, by order entered prior to the Claims Bar Date, or to administrative expenses arising under 11 U.S.C. §§ 330(a), 331, 364, 503, 507(a)(1), 507(a)(2), or 507(b);

R. The typical three (3) day service time shall not be added to extend the date set as the Claims Bar Date, but it shall be added to the thirty (30) day deadlines set forth above. Notwithstanding any provision of Fed. R. Bankr. P. 9006(f), if any deadline falls on a weekend or legal holiday, the deadline shall be extended to the next business day; and

S. The Debtors, the Committee and the U.S. Trustee shall submit a confidentiality protocol to the Court for approval regarding the manner in which copies of the Tort Claims will be provided to the Committee or any other party with a need to review the claims as approved by the Court.

XXX END OF ORDER XXX

Submitted by:

/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)

Admitted Pro Hac Vice

QUARLES & BRADY LLP
One S. Church Ave., Suite 1700
Tucson, Arizona 85701
(520) 770-8700

-and-

Thomas D. Walker
WALKER & ASSOCIATES, P.C.
500 Marquette N.W., Suite 650
Albuquerque, New Mexico 87102
(505) 766-9272

Counsel for Debtor

Copy to:

Ronald Andazola
Leonard K. Martinez-Metzgar
Office of the U.S. Trustee
P.O. Box 608
Albuquerque, NM 87103
ustpreion20.aq.ecf@usdoj.gov
Ronald.Andazola@usdoj.gov
Leonard.Martinez-Metzgar@usdoj.gov

Richard T. Fass
Perdue & Kidd, LLP
510 Bering Dr., Suite 550
Houston, TX 77057
rfass@perdueandkidd.com
Counsel for Certain Tort Claimants

Robert E. Pastor
Montoya, Jimenez & Pastor, P.A.
3200 N. Central Ave., Suite 2550
Phoenix, AZ 85012
repastor@mjpattorneys.com
Counsel for Certain Tort Claimants

James I. Stang
Pachulski Stang Ziehl & Jones
10100 Santa Monica Blvd., 13th Floor
Los Angeles, CA 90067
jstang@pszjlaw.com
Counsel for Official Committee of Unsecured Creditors

[All other parties attending any hearing on the Motion]