

**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 Jointly Administered with: Case No. 13-13677-t11
Jointly Administered with: BISHOP OF THE ROMAN CATHOLIC CHURCH OF THE DIOCESE OF GALLUP, an Arizona corporation sole. This pleading applies to: <input checked="" type="checkbox"/> All Debtors. <input type="checkbox"/> Specified Debtor.	

**NOTICE OF OBJECTION DEADLINE FOR THE “DEBTORS’ APPLICATION
FOR AN ORDER AUTHORIZING THE EMPLOYMENT OF INSURANCE
ARCHAEOLOGY GROUP AS AN INSURANCE ARCHEOLOGIST FOR THE
DEBTORS AND DEBTORS-IN-POSSESSION”**

On April 1, 2014, the Roman Catholic Church of the Diocese of Gallup (“**RCCDG**”) and the Bishop of the Roman Catholic Church of the Diocese of Gallup (the “**Arizona Entity**”, and together with RCCDG, the “**Debtors**”) filed the “Debtors’ Application for an Order Authorizing the Employment of Insurance Archaeology Group as an Insurance Archaeologist for the Debtors and Debtors-in-Possession” (the “**Application**”) [Dkt. No. 211] in which the Debtors request Court approval of employment of Insurance Archaeology Group (“**IAG**”) to provide services to the Debtors and debtors-in-possession in the above-captioned Chapter 11 reorganization case (the “**Reorganization Case**”). IAG has filed a verified disclosure pursuant to Bankruptcy Rules 2014 and 2016 (the “**Mulrennan Statement**”). The Application and Mulrunnan Statement may be viewed for a per page fee via the PACER (Public Access to Electronic Court Records) system. Log on to PACER at ecf.nmb.uscourts.gov. For registration and use instructions, see pacer.psc.uscourts.gov/index.html. You may also view this document at no charge from a computer at the Office of the Clerk of the United States Bankruptcy Court between 8:30 a.m. and 4:30 p.m., Monday through Friday, at the Federal Building and United States Courthouse, 500 Gold Ave., S.W., Tenth Floor, Albuquerque, New Mexico 87102.

The Application requests authority for Debtors to employ IAG, and to pay IAG monthly, upon receipt of IAG's billing statements and prior to the Court's allowance of IAG's fees and costs, 100% of billed fees and 100% of reimburseable costs that Debtors are authorized to pay, to be paid from funds of the estate. The Debtors may make interim payments to IAG based on services charged at the hourly rates set forth in the Mulrennan Statement. If the Application is approved, the rate structure agreed upon for this matter will be on a time and expense basis and will be billed at the standard rate of \$150.00-\$350.00 per hour. IAG will itemize costs; applicable gross receipts tax will be added to fees and costs; statements to the Debtor will be rendered monthly. All amounts paid by Debtors to IAG would be subject to ultimate approval of the Bankruptcy Court under Bankruptcy Code §§ 328, 330 and 331. Debtors request that IAG's employment be made effective as of April 1, 2014.

Any party who objects to the Application must file its objection with the Clerk of the United States Bankruptcy Court for the District of New Mexico within twenty-one (21) days after the date of mailing this notice, plus three (3) days as a result of service of this notice by mail, for a total of twenty-four (24) days from the date of this notice (or on or before **April 25, 2014**) and serve a copy of the objection on Susan G. Boswell at Quarles & Brady LLP, One S. Church Ave., Suite 1700, Tucson, Arizona 85701. Objections must be filed electronically to the extent required by New Mexico Local Bankruptcy Rule 5005-4. The Clerk's address (for use if electronic filing is not required) is Clerk's Office, United States Bankruptcy Court, District of New Mexico, P.O. Box 546, Albuquerque, NM 87103-0546. If any objections are timely filed, a hearing will be held on notice only to counsel for Debtors and objecting parties. If no objections are timely filed, an order granting the Application will be presented for entry without a hearing or further notice.

RESPECTFULLY SUBMITTED this 1st day of April, 2014.

/s/ Lori L. Winkelman

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CERTIFICATE OF SERVICE

Pursuant to F.R.C.P. 5(b)(3), F.R.B.P. 9036 and NM LBR 9036-1(b), I hereby certify that service of the foregoing “Notice of Objection Deadline for the Debtors’ Application for an Order Authorizing the Employment of Insurance Archaeology Group as an Insurance Archeologist for the Debtors and Debtors-In-Possession” was made on April 1, 2014 via e-mail and the notice transmission facilities of the Bankruptcy Court’s case management and electronic filing system on the below listed parties, and via U.S. Mail to all additional parties on the Debtors’ Limited Notice Lists.

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