

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

**NOTICE OF OBJECTION DEADLINE REGARDING MOTION FOR ORDER
APPOINTING A LEGAL REPRESENTATIVE TO REPRESENT THE INTERESTS
OF UNKNOWN TORT CLAIMANTS, INCLUDING MINORS, IN THE
REORGANIZATION CASES AND APPLICATION TO EMPLOY MICHAEL
P. MURPHY AS UNKNOWN CLAIMS REPRESENTATIVE**

On February 11, 2015, the Roman Catholic Church of the Diocese of Gallup (“**RCCDG**”) and the Bishop of the Roman Catholic Church of the Diocese of Gallup (the “**Arizona Entity**” and together with RCCDG, the “**Debtors**”), the Debtors and debtors-in-possession in the above-captioned, jointly-administered Chapter 11 reorganization cases (the “**Reorganization Cases**”) filed the “Motion for Order Appointing a Legal Representative to Represent the Interests of Unknown Tort Claimants, Including Minors, in the Reorganization Cases and Application to Employ Michael P. Murphy as Unknown Claims Representative” [Dkt. No. 348] (the “**Motion**”).

In the Motion, the Debtors seek entry of an order appointing Michael P. Murphy (“**Murphy**”), a Managing Director of AlixPartners, LLC (“**AlixPartners**”), as the Unknown Claims Representative¹ in the Reorganization Cases. The Debtors request that the Unknown Claims Representative be permitted to represent the interests of Unknown Tort Claimants.

Specifically, the Debtors request that the Unknown Claims Representative have the following rights, duties, and responsibilities: (a) undertaking an investigation and analysis of the estimated number of Unknown Tort Claimants and the estimated value of any claims held by any

¹ Terms not herein defined shall have the meaning ascribed to them in the Motion.

Unknown Tort Claimants; (b) filing a Proof of Claim on behalf of all Unknown Tort Claimants within 60 days of entry of an order approving Murphy's retention, subject to extension by consent of the Debtors and the Committee or for good cause shown; (c) negotiating (including through mediation) with the Debtors, the Committee, and other appropriate parties any provisions of a Chapter 11 plan for the evaluation, determination, and treatment of any claims of Unknown Tort Claimants; (d) advocating the legal position of Unknown Tort Claimants before the Court, and if necessary, filing pleadings and presenting evidence on any issue affecting the claims of the Unknown Tort Claimants; (e) taking all other legal actions reasonably necessary to represent the interests of Unknown Tort Claimants; and (f) serving as an independent fiduciary acting on behalf of all Unknown Tort Claimants.

Furthermore, the Motion requests the Court's authority for the Debtors to employ AlixPartners, as a consultant to Murphy, to assist Murphy in carrying out his duties as the Unknown Claims Representative. The Debtors and AlixPartners have agreed that AlixPartners will charge a flat fee of \$50,000, to be paid from the Debtors' estate, for theirs and Murphy's professional services. Additionally, AlixPartners and Murphy will be reimbursed for all reasonable, actual, and necessary costs and expenses incurred in the course of their professional services.

The Motion 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 these documents 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.

Any party who wishes to object to the Motion must file its objection with the Clerk of the United States Bankruptcy Court for the District of New Mexico **within 21 days after the date of mailing of this notice, plus three (3) days due to service of this Notice by mail (or, on or before March 9, 2015)**, and serve a copy of the objection on Quarles & Brady LLP at the address given below. Objections must be filed electronically to the extent required by New Mexico Local Bankruptcy Rule 5005-4. The Clerk's address (for use if electronic filing is not required) is Clerk's Office, United States Bankruptcy Court, District of New Mexico, P.O. Box 546, Albuquerque, NM 87103-0546. If any objections are timely filed, a hearing will be held on notice only to Counsel for the Debtors and objecting parties. If no objections are timely filed, an order granting the Motion will be presented for entry without a hearing or further notice.

RESPECTFULLY SUBMITTED this 11th day of February, 2015.

/s/ Elizabeth S. Fella

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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 Regarding Motion for Order Appointing a Legal Representative to Represent the Interests of Unknown Tort Claimants, Including Minors, in the Reorganization Cases and Application to Employ Michael P. Murphy as Unknown Claims Representative” was made on February 11, 2015 via e-mail and the notice transmission facilities of the Bankruptcy Court’s case management and electronic filing system on the below listed parties, and via U.S. Mail to all additional parties on the Debtors’ Limited Notice List.

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