

**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. This pleading applies to: <input checked="" type="checkbox"/> All Debtors. <input type="checkbox"/> Specified Debtor.	Case No. 13-13677-t11

**NOTICE OF OBJECTION DEADLINE REGARDING “MOTION TO (I) RETAIN
BROKERS; (II) SELL PROPERTY UNDER 11 U.S.C. § 363(b), (f), AND (m); AND (III)
APPROVE SALE PROCEDURES”**

On May 18, 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 to (I) Retain Brokers, (II) Sell Property Under 11 U.S.C. § 363(b), (f), and (m), and (III) Approve Sale Procedures” [Dkt. No. 383] (the “**Motion**”).

In the Motion, the Debtors seek entry of an order authorizing the employment of Tucson Realty & Trust Co. (“**TRT**”) and its Accelerated Marketing Group (individually “**AMG**” and together with TRT, the “**Brokers**”) in order to market and sell the Debtors’ Sale Assets.¹ Furthermore, the Motion requests the Court’s authority to compensate the Brokers for their services by paying the actual marketing costs relating to the Sale in an amount not to exceed \$45,000 from the Debtors’ estates, and a commission of 10% of the purchase price of each property (which shall be paid as a buyer’s premium, as more fully explained in the Motion).

Additionally, the Debtors seek entry of an order authorizing the Debtors’ to sell the Sale Assets free and clear of any liens, claims, or interests, to the extent any exist, in order to generate funds to pay creditors and other costs and expenses associated with the Reorganization Cases.

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

The Sale is intended to be conducted as an “open outcry”² and “absolute and without reserve”³ auction for the some of the Sale Assets. In consultation with the Official Committee of Unsecured Creditors and the Brokers, the Debtors may determine that a reserve price is necessary for certain Sale Assets. Pursuant to the terms set forth in the Motion, the Debtors will submit to the Court the results of auction within three (3) business days of completion of the auction, at which time the Debtors may ask the Court to grant the successful bidders the protections of 11 U.S.C. § 363(m) reserved for good faith purchasers.

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. You may also obtain copies of the Motion by contacting Kelly Webster at Quarles & Brady LLP, One S. Church Avenue, Suite 1700, Tucson, Arizona 85701, (520) 770-8712, kelly.webster@quarles.com.

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 June 11, 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 18th day of May, 2015.

/s/ Elizabeth S. Fella

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² An “open outcry” auction is one with live bidding.

³ “Absolute and without reserve” means that there is no reserve or minimum bid, and that the property is sold to the highest bidder regardless of price.

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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 to (I) Retain Brokers, (II) Sell Property Under 11 U.S.C. § 363(b), (f), and (m), and (III) Approve Sale Procedures” was made on May 18, 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 and Master Mailing List.

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