

**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>
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**FOURTH SUPPLEMENTAL VERIFIED STATEMENT WITH RESPECT TO
DEBTORS' APPLICATION FOR AN ORDER AUTHORIZING THE EMPLOYMENT
OF QUARLES & BRADY LLP AS GENERAL REORGANIZATION AND
RESTRUCTURING COUNSEL PURSUANT TO FED. R. BANKR. P. 2014(a)**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

I, Elizabeth S. Fella, pursuant to Fed. R. Bankr. P. 2014(a), declare under penalty of perjury as follows:

1. I am an adult person and a resident of Pima County, Arizona. I have personal knowledge of the facts recited herein and I am competent to testify regarding such facts if called as a witness in this matter.

2. This document supplements the "Verified Bankruptcy Rule 2014(a) and 2016(b) Statement of Susan G. Boswell with Respect to Debtor's Application for an Order Authorizing the Employment of Quarles & Brady LLP as General Reorganization and Restructuring Counsel for the Debtor and Debtor-in-Possession" (the "**Verified Statement**") filed as Exhibit "A" to

“Debtor’s Application for an Order Authorizing the Employment of Quarles & Brady LLP as General Reorganization and Restructuring Counsel for Debtor and Debtor-in-Possession” [Dkt. No. 10¹] (the “**Application**”). The Verified Statement is herein incorporated by this reference.

3. The Court granted the Application on January 27, 2014, and entered the “Order Authorizing the Employment of Quarles & Brady LLP as General Reorganization and Restructuring Counsel for the Debtor and Debtor-in-Possession” [Dkt. No. 143].

4. Since the time I made my initial Verified Statement and the Application was granted, additional connections have been discovered or have occurred which do not affect Quarles & Brady’s LLP (“**Q&B**”) “disinterestedness” in this case, but nevertheless warrant the filing of this supplemental verified statement in the interest of full disclosure.

5. Mutual of Omaha Bank (“**MO Bank**”) has retained Q&B for representation in a variety of matters, none of which are or have been related to any matters involving the Debtors.

6. Mutual of Omaha Insurance (“**MO Insurance**”) is an insurance company that provides life insurance policies to employees of the Diocese of Gallup (the “**Diocese**”).²

7. MO Bank has a “connection” with the above-named Debtors only in that it, as well as MO Insurance, are divisions of the same parent company. To the best of Q&B’s knowledge, MO Bank is not a creditor of the Debtors nor do they hold an interest adverse to the Debtors; therefore, to the best of Q&B’s knowledge and information, MO Bank is not currently a

¹ The Application was also filed in Case No. 13-13677-t11, *In re: Bishop of the Roman Catholic Church of the Diocese of Gallup* at Dkt. No. 12.

² The Diocese of Gallup is the canonical entity that carries out the mission and ministry of the Catholic Church within the decreed territory of the Diocese, and the Debtors are the civil entities that operate the business of the Diocese.

party-in-interest in the above-captioned, jointly-administered reorganization cases (the “**Reorganization Cases**”).

6. Q&B continues to be “disinterested” within the meaning of 11 U.S.C. § 101(14). Nevertheless, I make the statements contained herein to provide full disclosure of any “connections” with any actual or potential parties-in-interest in the Reorganization Cases.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge, information and belief.

Executed this 4th day of June, 2015 in Tucson, Arizona.

/s/ Elizabeth S. Fella
ELIZABETH S. FELLA

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 “Fourth Supplemental Verified Statement with Respect to Debtors’ Application for an Order Authorizing the Employment of Quarles & Brady LLP as General Reorganization and Restructuring Counsel Pursuant to Fed. R. Bankr. P. 2014(a)” was made on June 4, 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 Lists.

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