

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

In re:	Chapter 11
ROMAN CATHOLIC CHURCH OF THE DIOCESE OF GALLUP, a New Mexico corporation sole,	Case No. 13-13676-t11
Debtor.	Jointly Administered with:
Jointly Administered with:	Case No. 13-13677-t11
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.	

**OBJECTION OF OFFICIAL COMMITTEE OF UNSECURED CREDITORS
AND MOVANTS TO DEBTORS' EMERGENCY MOTION TO CONTINUE
TRIAL SCHEDULED TO COMMENCE ON NOVEMBER 10, 2015**

The Official Committee of Unsecured Creditors (the "Committee") of the Roman Catholic Church of the Diocese of Gallup and the Bishop of the Roman Catholic Church of the Diocese of Gallup (the "Debtors"), Alfred Moya ("Moya"), Jane L.S. Doe ("Jane Doe") and John M.H. Doe ("John Doe" and, with Moya and Jane Doe, the "Movants") hereby object to the *Debtors' Emergency Motion to Continue Trial Scheduled to Commence on November 10, 2015* (the "Adjournment Motion") [Docket No. 448] and the joinder thereto filed by the New Mexico Property and Casualty Insurance Guaranty Association ("NMPCIGA") [Docket No. 451].

Preliminary Statement

1. As stated in the Stay Relief Motions,¹ the Movants seek to lift the automatic stay in order break an impasse at mediation that, upon information and belief, is due in large part to the Debtors' and/or their insurers' gross under-estimation of the amount of damages due to the Debtors' sex abuse victims. This impasse can be resolved by better information about the damages that claims would be awarded after a jury trial.

2. In order to grant the Debtors' Adjournment Motion, the Court must find "compelling circumstances" that require extension of the deadline. 11 U.S.C. 362(e)(1). The Debtors' inaction and attempt to manufacture a discovery dispute are not compelling reasons justifying further delay.

3. The Movants have agreed to adjourn the final hearing on the Lift Stay Motions to November 10 and 12, 2015 – approximately four months after the Motions were filed. The Debtors now seek to delay the hearing for another two months. The Court should not allow the Debtors to delay the lift stay hearings further. The Movants have been waiting for almost two years for the Debtors' chapter 11 cases to resolve. They have waited decades to resolve their abuse. Movant Moya has been litigating his underlying state court case for approximately four years. There is no basis to give the Debtors a full six months to litigate the Lift Stay Motions.

4. The Debtors have elected a scorched earth strategy in order to prevent claims from going to trial. As part of this strategy, they are going to force the

¹ Capitalized terms used but not defined herein shall have the meanings and definitions ascribed to them in the Adjournment Motion.

Movants and the Committee to put forward evidence of matters that should be self-evident. These include evidence (including expert testimony) that the delay caused by these chapter 11 cases (as well as the Debtors' litigation tactics in prepetition litigation) is detrimental to sexual abuse survivors who have now been waiting almost two years for the bankruptcy process to be resolved. This delay is on top of the decades of suffering that the Movants and other victims of these Debtors have suffered. While the Movants and the Committee would prefer to avoid spending time litigating such self-evident issues, they will do so if necessary to obtain relief from the stay.

5. While making clear that they will hold the Committee and the Movants to proving every element of their stay relief motions, the Debtors have:

- a. ignored repeated representations that the Committee does not have relevant, non-privileged documents to provide to the Debtors regarding the Lift Stay Motions;
- b. demanded that the Movants produce documents that do not exist;
- c. demanded that Movant Moya produce yet again documents that were produced to the Debtors in his underlying state court case;
- d. served a single, informal, request for documents, to which they continue to demand a formal response after being repeatedly informed that there are either no responsive documents or the requested documents were produced in the underlying litigations;

- e. served a single notice of a deposition on the Committee pursuant to Civil Rule 30(b)(6); and
- f. refused to schedule any depositions of witnesses the Committee and the Movants may call at an evidentiary hearing on the Lift Stay Motions.

6. The Debtors have not been diligent about pursuing discovery in this case. The Movants and the Committee have gone above and beyond any requirement under the Bankruptcy Rules and disclosed to the Debtors the documents that they may present and witnesses they may rely upon at an evidentiary hearing on the Lift Stay Motions.² The Movants and the Committee also informed the Debtors which the witnesses they intend to call at the evidentiary hearing during the meet and confer held on August 13, 2015.

Discussion

7. The Debtors argue that the Court should adjourn the hearing for approximately two months. They cite the following four factors in support of their request:

- a. the diligence of the party requesting the continuance;
- b. the likelihood that the continuance would accomplish the stated purpose;

² Notably, Fed.R.Civ P. 6(a)(1) (mandatory disclosure), 26(a)(2) (disclosures regarding expert testimony) and 26(a)(3) (additional pre-trial disclosure), and 26(f) (mandatory meeting before scheduling conference/discovery plan) do not apply to contested matters. Fed.R.Bankr.P. 9014.

- c. the inconvenience to the opposing party and the court; and the need asserted for the continuance and the harm that the requesting party might suffer as a result of the denial of the continuance.

8. The Debtors failed to cite section 362(e)(1) of the Bankruptcy Code, which clearly governs their request for a continuance of the evidentiary hearing on the Stay Relief Motions.³ Section 362(e)(1) provides that the final hearing on a motion for relief from stay under section 362(d) must be held within 30 days of the preliminary hearing unless the 30 day deadline is extended by consent of the parties. The Court may extend the deadline only upon finding that “compelling circumstances” require extension of the deadline. The Debtors’ request for an adjournment should be denied regardless of the standard imposed.

³ Section 362(e)(1) provides as follows:

Thirty days after a request under subsection (d) of this section for relief from the stay of any act against property of the estate under subsection (a) of this section, such stay is terminated with respect to the party in interest making such request, unless the court, after notice and a hearing, orders such stay continued in effect pending the conclusion of, or as a result of, a final hearing and determination under subsection (d) of this section. A hearing under this subsection may be a preliminary hearing, or may be consolidated with the final hearing under subsection (d) of this section. The court shall order such stay continued in effect pending the conclusion of the final hearing under subsection (d) of this section if there is a reasonable likelihood that the party opposing relief from such stay will prevail at the conclusion of such final hearing. If the hearing under this subsection is a preliminary hearing, then such final hearing shall be concluded not later than thirty days after the conclusion of such preliminary hearing, unless the 30-day period is extended with the consent of the parties in interest or for a specific time which the court finds is required by compelling circumstances.

A. The Debtors Have Not Been Diligent

9. The Debtors have not been diligent in pursuing discovery.

Moreover, they have ignored the repeated representations of the Committee and the Movants regarding the existence of non-privileged documents in the possession, custody or control of the Movants or the Committee. *See* email from Robert E. Pastor to Susan G. Boswell attached hereto as **Exhibits A** and **B**. Rather than accept this reality, the Debtors continue to demand documents that don't exist, documents they have, and documents that are on the public record. *See* emails between and among the parties attached hereto as **Exhibit C**. Ignoring reality and placing burdensome, duplicative demands on the Movants and the Committee is not diligence; it is an intentional effort to manufacture a crisis out of whole cloth.

10. The Debtors sent the Movants and Committee an informal document request. The Movants and the Committee have repeatedly informed the Debtors that there are no documents responsive to the informal request (other than documents that the Debtors produced to the Committee, that Movant Moya produced to the Debtors in his underlying state court action or that are part of the public record in these cases). Rather than accept the disclosure, the Debtors have demanded a formal reply to their informal request. *See* Ex B. That is absurd. It clearly demonstrates that the Debtors simply want to burden the Movants with procedures that are not found in any rule or professional course of dealing.

11. The Debtors have failed to notice a single deposition other than a Civil Rule 30(b)(6) deposition of the Committee. In fact, they have refused to schedule a deposition of the Movants' witnesses despite repeated offers to do so. The Debtors' refuse to do so until after the Movants produce documents that Moya already produced during the underlying litigation. *See* emails between the parties attached hereto as **Exhibit D** and **E**. This is simple make-work by the Debtors should not be endorsed by the Court.

12. The Movants and Committee provided full disclosure of the documents the Movants and/or Committee intend to use at trial (subject to adjustment as discovery progresses). *See* **Exhibit F** attached hereto. The Movants and the Committee were not required to do so under Bankruptcy Rule 9014, which specifically excludes Civil Rule 26(a) form motion practice under the Bankruptcy Rules. Nevertheless, the Movants and Committee made the disclosures in an effort to make the discovery process more efficient. Notably, the Debtors have made no such disclosure to the Committee or the Movants. Rather than utilize the disclosure, the Debtors have complained that it is overbroad and demanded that Movant Moya produce documents that he has already produced to the Debtors in the context of his underlying state course case. Again, the Debtors' position is absurd and demonstrates a frivolous effort to burden Moya's counsel and delay the hearing on the Lift Stay Motions.

13. The Debtors complain that the Movants have not produced Dr. Daniel Brown's written report. The Movants have repeatedly informed the Debtors that

Dr. Brown will testify that the delay and protracted litigation of sexual abuse claims causes ongoing distress to sexual abuse survivors. This should be self-evident and the necessity to obtain testimony from Dr. Brown on this matter clearly demonstrates that the Debtors are employing aggressive scorched-earth tactics in an effort to prevent its victims from telling their story. Moya also produced a written report by Dr. Brown in 2011. The Movants and the Committee will not rely on any other written report by Dr. Brown in support of the Lift Stay Motions. As such, this complaint by the Debtors is also frivolous.

14. The Debtors complain that the Movants originally agreed to produce Dr. Brown for a deposition in Phoenix on October 27, 2015, but now he is only available in Boston on that day. The Movants originally offered to produce Dr. Brown in Phoenix. However, the Debtors failed or refused to schedule his deposition. As such, Dr. Brown informed the Movants that he could only appear for a deposition in Boston on October 27 due to changes in his schedule.

15. The Debtors complain that they have not been able to finalize a scheduling order with the Movants and Committee. The reasons for this are simple. Catholic Mutual, which objected to the Lift Stay Motions, did not respond to any emails regarding the scheduling order. Moreover, the Debtors attempted to insert provisions into the scheduling order that were clearly inappropriate or self-serving. Nothing requires a scheduling order in an evidentiary hearing under Bankruptcy Rule 9014. The Committee and the Movants attempted to negotiate such an order in good faith in order to smooth the

process; it was Catholic Mutual's failure to respond and the Debtors' inappropriate demands that undermined the efforts to negotiate an order.

B. A Continuance Will Not Accomplish the Stated Purpose

16. The Debtors state that a continuance is necessary "so that the Debtors may effectively defend the estate's interest." Adjournment Motion at 7. However, the Debtors can still do so. They have disclosure of the documents the Movants and the Committee may use at trial. Such documents have already been produced to the Debtor or are otherwise available to the Debtors (as a publicly filed document or one of the Debtors' documents). The Movants' witnesses can appear for depositions upon reasonable advance notice. As such, the Debtors can adequately defend their interests if they choose to do so.

C. Further Delay Would Be Highly Inconvenient and Harmful for the Movants and the Committee

17. The Movants have been waiting decades for resolution of their sexual abuse claims. The Movants and the Committee have been working diligently to resolve these chapter 11 cases for nearly two years. The Movants and the Committee believe that a sample of cases needs to move forward, and be reduced to judgment if necessary, in order to break the impasse over settlement negotiations with the Debtors and its insurers. The Movants have agreed to adjourn the evidentiary hearing to approximately four months after they filed the Lift Stay Motions. Further delay at this time would highly inconvenience the Movants and the Committee.

D. Conclusion

18. Based on the foregoing, the Court should deny the Adjournment Motion.

Dated: October 14, 2015

MONTOYA, JIMENEZ & PASTOR, P.A.

By /s/ Robert E. Pastor
Robert E. Pastor (pro hac vice pending)
3200 North Central Avenue, Ste. 2550
Phoenix, Arizona 85012
Tel: 602-279-8969/Fax: 602-256-6667
repastor@mjpattorneys.com

-and-

MANLY, STEWART & FINALDI
John C. Manly
19100 Von Karman Ave., Suite 800
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Counsel for Movants

PACHULSKI STANG ZIEHL & JONES LLP

By /s/ Ilan D. Scharf
James I. Stang (admitted pro hac vice)
Ilan D. Scharf (pro hac vice pending)
PACHULSKI STANG ZIEHL & JONES LLP
10100 Santa Monica Blvd., 13th Floor
Los Angeles, CA 90067
Tel: 310-277-6910/Fax: 310-201-0760

Counsel for Committee

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 “**OBJECTION OF OFFICIAL COMMITTEE OF UNSECURED CREDITORS AND MOVANTS TO DEBTORS’ EMERGENCY MOTION TO CONTINUE TRIAL SCHEDULED TO COMMENCE ON NOVEMBER 10, 2015**” was made on October 14, 2015, via email and the notice transmission facilities of the Bankruptcy Court’s case management and electronic filing system on the below listed 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 <i>Local Counsel for Debtor and Debtor-in-Possession</i>
Richard T. Fass Donald H. Kidd Perdue & Kidd, LLP 510 Bering Dr., Suite 550 Houston, TX 77057 rfass@perdueandkidd.com dkidd@perdueandkidd.com <i>Counsel for Tort Claimants</i>	Douglas R. Vadrnais Modrall, Sperling, Roehl, Harris & Sisk, P.A. P.O. Box 2168 Albuquerque, NM 87103 drv@modrall.com <i>Counsel for The Bank of Colorado d/b/a Pinnacle Bank</i>

<p>Dennis Jontz Lewis Roca Rothgerber 201 Third Street, NW, Ste. 190 Albuquerque, NM 87102 djontz@lrrlaw.com <i>Local Counsel for Catholic Peoples Foundation and Parish Steering Committee of Roman Catholic Church of the Diocese of Gallup</i></p>	<p>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 <i>Counsel for Catholic Peoples Foundation and Parish Steering Committee of Roman Catholic Church of the Diocese of Gallup</i></p>
<p>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 <i>Counsel for New Mexico Property and Casualty Insurance Guaranty Association</i></p>	<p>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 <i>Counsel for Southwest Indian Foundation, Inc.</i></p>
<p>George M. Moore Bonnie B. Gandarilla Moore Berkson & Gandarilla P.C. 3800 Osuna Rd., NE, Ste. 2 Albuquerque, NM 87109 mbglaw@swcp.com bbg1lusc@swcp.com <i>Local Counsel for Southwest Indian Foundation, Inc.</i></p>	<p>Charles R. Hughson Rodey, Dickason, Sloan, Akin & Robb, P.A. P.O. Box 1888 Albuquerque, NM 87103 chughson@rodey.com <i>Counsel for St. Bonaventure Indian Mission & School</i></p>

<p>Steven D. Jerome Snell & Wilmer, LLP One Arizona Center 400 E. Van Buren St., Ste. 1900 Phoenix, AZ 85004 sjerome@swlaw.com <i>Counsel for The Roman Catholic Church of the Diocese of Phoenix</i></p>	<p>David Spector Everett Cygal Schiff Hardin LLP 233 S. Wacker Dr., Suite 660 Chicago, IL 60606 dspector@schiffhardin.com ecygal@schiffhardin.com <i>Counsel for Catholic Mutual Relief Society</i></p>
<p>Randy S. Bartell Victor R. Ortega Sharon T. Shaheen Montgomery & Andrews, P.A. P.O. Box 2307 Santa Fe, NM 87504 rbartell@montand.com vortega@montand.com sshahen@montand.com <i>Counsel for Catholic Mutual Relief Society of America</i></p>	<p>Rodney L. Schlagel James H. Johansen Butt Thornton & Baehr P.C. P.O. Box 3170 Albuquerque, NM 87190 rlschlagel@btblaw.com jhjohansen@btblaw.com <i>Counsel for the Roman Catholic Diocese Of Corpus Christi</i></p>
<p>Timothy J. Hurley Theresa H. Vella Taft Stettinius & Hollister LLP 425 Walnut Street, Suite 1800 Cincinnati, OH 45202 hurley@taftlaw.com vella@taftlaw.com <i>Counsel for the Province of St. John the Baptist of the Order of Friars Minor</i></p>	<p>Alyson M. Fiedler Schiff Hardin LLP 666 Fifth Avenue, 17th Floor New York, NY 10103 afiedler@schiffhardin.com ldelucia@schiffhardin.com <i>Counsel for Catholic Mutual Relief Society</i></p>
<p>Michael Murphy Young Kim AlixPartners, LLP 580 California Street San Francisco, CA 94104 mmurphy@alixpartners.com ykim@alixpartners.com <i>Unknown Claims Representative</i></p>	<p>Francis H. LoCoco Bruce G. Arnold Whyte Hirschbeck Dudek S.C. 555 E. Wells St., Suite 1900 Milwaukee, WI 53202 flococo@whdlaw.com barnold@whdlaw.com <i>Counsel for Roman Catholic Diocese of Corpus Christi</i></p>

John C. Kelly Coppersmith Brockelman PLLC 2800 N. Central Ave., Suite 1200 Phoenix, AZ 85004 Jkelly@csblaw.com <i>Counsel for The Province of Our Lady of Guadalupe of the Order of Friars Minor</i>	
--	--

PACHULSKI STANG ZIEHL & JONES LLP

By: /s/ Ilan D. Scharf
Ilan D. Scharf

Exhibit A

Ilan D. Scharf

From: Robert E. Pastor <repastor@mjpattorneys.com>
Sent: Tuesday, October 13, 2015 1:50 PM
To: Boswell, Susan G. (TUC x7713)
Cc: Winkelman, Lori L. (PHX x3452); Fella, Elizabeth (TUC x7755); Ilan D. Scharf; John 2 Manly; Vince Finaldi
Subject: Re: RCCDG [QBLLP-ACTIVE.FID37014021]

With respect to the Moya case, you have Dan Brown's reports (disclosed 3/25/11) and affidavit (4/2011). You have Dan Brown's complete file disclosed February 2012 (Bates 147-322).

Bishop Wall's decision to continue to delay this matter is inconsistent with Pope Francis' statement that "abuse cannot be kept secret any longer, all responsible will be held accountable."

Please tell Bishop Wall to stop delaying this case.

Robert E. Pastor
Montoya, Jimenez & Pastor, P.A.
3200 N. Central Avenue, Suite 2550
Phoenix, Arizona 85012

repastor@mjpattorneys.com
Phone: 602-279-8969
Fax: 602-256-6667

On Oct 13, 2015, at 10:30 AM, Boswell, Susan G. (TUC x7713) <Susan.Boswell@quarles.com> wrote:

Robert

When you provide the documents and other information we have requested, we will be in a position to schedule Mr. Moya's and others depositions.

[<q-b4_5a3d366e-5945-4dc0-8c05-a908d9993108.jpg>](#)

Susan Boswell / Partner

Susan.Boswell@quarles.com / [<Linkedin2_4312dd39-ebf3-42f6-9c1f-c0c3176ccd89.jpg>](#) [<bio_5b511018-8ab3-4794-9a37-b3a54806fb64.jpg>](#)

One South Church Avenue, Suite 1700 / Tucson, AZ 85701-1621

Office 520-770-8713 / Cell 520-349-6644 / quarles.com

From: Robert E. Pastor [<mailto:repastor@mjpattorneys.com>]

Sent: Wednesday, October 07, 2015 3:59 PM

To: Winkelman, Lori L. (PHX x3452)

Cc: Fella, Elizabeth (TUC x7755); Ilan D Scharf; Boswell, Susan G. (TUC x7713); John Manly; Vince Finaldi

Subject: Re: RCCDG

Please let us know when you want depose Alfred Moya.

Robert E. Pastor
Montoya, Jimenez & Pastor, P.A.
3200 N. Central Avenue, Suite 2550
Phoenix, Arizona 85012

repastor@mjpattorneys.com
Phone: 602-279-8969
Fax: 602-256-6667

On Oct 7, 2015, at 2:24 PM, Winkelman, Lori L. (PHX x3452)
<Lori.Winkelman@quarles.com> wrote:

Robert,

I left a message with your assistant yesterday afternoon but had not heard back. I also spoke with Ilan. The debtors will be filing a motion to continue the evidentiary hearing currently scheduled to commence on November 10th.

Due to various factors including (among other things) that we have yet to receive documents and a written response from our document request, nor have we received Dan Browns report which was promised to us weeks ago, we do not have sufficient time or information to prepare our case.

Please respond to this email and confirm whether you consent to the continuance. Ilan has indicated that the Committee does not consent but we would like your response also since you are a movant.

If we don't hear back we will let the Court know that we did not hear back.

If you would like to discuss further, please let me know a number where I can contact you. I am currently sitting in the Albuquerque airport waiting for my flight. Thank you.



Lori Winkelman / Partner



Lori.Winkelman@quarles.com /
Renaissance One, Two North Central Avenue / Phoenix, AZ 85004-2391
Office 602-229-5452 / quarles.com
Assistant Debra Lindsey 602-229-5294

CONFIDENTIALITY NOTICE: This electronic mail transmission and any attachments are confidential and may be privileged. They should be read or retained only by the intended recipient. If you have received this transmission in error, please notify the sender immediately and delete the transmission from your system.

Exhibit B

Ilan D. Scharf

From: Robert E. Pastor <repastor@mjpattorneys.com>
Sent: Tuesday, October 13, 2015 2:18 PM
To: Boswell, Susan G. (TUC x7713)
Cc: Winkelman, Lori L. (PHX x3452); Fella, Elizabeth (TUC x7755); Ilan D. Scharf; John 2 Manly; Vince Finaldi
Subject: Re: RCCDG [QBLLP-ACTIVE.FID37014021]

You are incorrect. To my knowledge Alfred Moya has not seen any other therapists since 2011 because Bishop Wall terminated counseling services after he filed his lawsuit. His therapists are still owed money.

There is no reason for Bishop Wall to delay this any further.

Robert E. Pastor
Montoya, Jimenez & Pastor, P.A.
3200 N. Central Avenue, Suite 2550
Phoenix, Arizona 85012

repastor@mjpattorneys.com
Phone: 602-279-8969
Fax: 602-256-6667

On Oct 13, 2015, at 11:11 AM, Boswell, Susan G. (TUC x7713) <Susan.Boswell@quarles.com> wrote:

Robert

You have identified several therapists/psychologist as witnesses other than Dan Brown. You also indicated at the meet and confer on August 13 as well as in subsequent conversations that Dr. Brown and others would testify that the claimants needed to obtain closure and the way for them to obtain closure was to go to trial on their claims. Dr. Brown's reports from 2011 do not address those issues as you know. In addition, we asked for all expert opinions, records, etc. of any Experts (which were defined in our request to include any treating therapists or other professionals). Certainly there are records post 2011 as you have clearly indicated in prior discussions and is evident from your disclosures. When we get those and the rest of the documents we have requested, we can schedule the depositions.

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Susan Boswell / Partner

Susan.Boswell@quarles.com / [<Linkedin2_4312dd39-ebf3-42f6-9c1f-c0c3176ccd89.jpg>](#) [<bio_5b511018-8ab3-4794-9a37-b3a54806fb64.jpg>](#)

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Sent: Tuesday, October 13, 2015 10:50 AM
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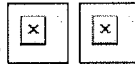
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Lori Winkelman / Partner



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Exhibit C

Ilan D. Scharf

From: Boswell, Susan G. (TUC x7713) <Susan.Boswell@quarles.com>
Sent: Friday, October 09, 2015 11:15 AM
To: Robert Pastor
Cc: Ilan D. Scharf; Fella, Elizabeth (TUC x7755); James Stang; John 2 Manly; Vince Finaldi; Richard Fass; Don Kidd; Mazel Edward (edmazel@askewmazelfirm.com) (edmazel@askewmazelfirm.com); Mark Ish; Spector, David; Cygal, Everett (ecygal@schiffhardin.com); Winkelman, Lori L. (PHX x3452)
Subject: RE: Diocese of Gallup - Debtor's September 4 document request [QBLLP-ACTIVE.FID37014021]

Mr. Pastor

My observation was simple and required nothing more than a simple response which is lacking below. I would request that you simply respond. You can provide bates numbers or copies of documents or pleadings.

From: Robert E. Pastor [mailto:repastor@mjpattorneys.com]
Sent: Friday, October 09, 2015 8:07 AM
To: Boswell, Susan G. (TUC x7713)
Cc: Ilan D. Scharf; Fella, Elizabeth (TUC x7755); James Stang; John 2 Manly; Vince Finaldi; Richard Fass; Don Kidd; Mazel Edward (edmazel@askewmazelfirm.com) (edmazel@askewmazelfirm.com); Mark Ish; Spector, David; Cygal, Everett (ecygal@schiffhardin.com); Winkelman, Lori L. (PHX x3452)
Subject: Re: Diocese of Gallup - Debtor's September 4 document request [QBLLP-ACTIVE.FID37014021]

Susan: are you telling us you never reviewed the files in the underlying state court proceedings?

What happened to those claims that you had to review Warburton's files for privilege before disclosing to Catholic Mutual?

Are you telling us that you never bothered to review the very file that was the spear head of forcing your client to file for BK protection?

Please enlighten us, how were you ever able to have a meaningful discussion with Bishop Wall regarding his exposure if you don't have an understanding of the underlying facts.

Let me guess, you didn't do any of that because BK protection is just another tool to beat down victims who dare to seek justice.

Robert E. Pastor
Montoya, Jimenez & Pastor, P.A.
3200 N. Central Ave., Suit 2550
P: 602-279-8969
F: 602-256-6667
repastor@mjpattorneys.com

On Oct 9, 2015, at 7:42 AM, Boswell, Susan G. (TUC x7713) <Susan.Boswell@quarles.com> wrote:

See my comments below

From: Ilan D. Scharf [<mailto:ischarf@pszjlaw.com>]

Sent: Friday, October 09, 2015 6:35 AM

To: Boswell, Susan G. (TUC x7713); Fella, Elizabeth (TUC x7755); James Stang; Robert Pastor; John 2 Manly; Vince Finaldi; Richard Fass; Don Kidd; Mazel Edward (edmazel@askewmazelfirm.com) (edmazel@askewmazelfirm.com); Mark Ish; Spector, David; Cygal, Everett (ecygal@schiffhardin.com)

Cc: Winkelman, Lori L. (PHX x3452)

Subject: RE: Diocese of Gallup - Debtor's September 4 document request [QBLLP-ACTIVE.FID37014021]

Susan,

Responding to your comments in order:

1. You sent an informal response. The Committee has notified you verbally and in writing many times that the Committee does not have non-privileged, non work-product responsive documents or communications, except for documents that are publicly filed or were produce by the Debtors to the Committee. You asked us to specify which documents we may rely upon at trial and – even though we are not required to do so under any procedural rule – we did so. Your demand for a formal response to an informal request makes no sense.

WE HAVE A SIGNIFICANT DIFFERENCE OF OPINION ON THIS AND IT IS NOT CONSISTENT WITH OUR CALL ON SEPTEMBER 9 WHICH I REFERENCED IN THE EMAIL. SO I GUESS NOW YOUR POSITION IS THAT BECAUSE WE AGREED TO INFORMAL REQUESTS, THAT YOU ARE NOT BOUND TO FOLLOW ANY PROCEDURES. I NOW UNDERSTAND YOUR POSITION AND WILL TAKE THAT INTO ACCOUNT IN RESPONDING TO YOUR REQUEST. I NOW ALSO UNDERSTAND GOING FORWARD THAT THERE WILL BE NO INFORMAL PROCEDURES THAT WE AGREE UPON AND EVERYTHING WILL BE DONE STRICTLY BY THE RULES. LESSON LEARNED.

2. I will let Messrs. Pastor and Manly speak for their clients. They do so more eloquently than I can. The Committee has no responsive documents as discussed above.

I AM SORRY YOU THINK THAT THEIR RESPONSES ARE ELOQUENT.

3. If you have concerns about the scope of the Committee and Movants' document requests, we can and will make ourselves available to meet and confer regarding the requests. If you already produced documents that you intend to rely on at the hearing, please return the courtesy that we extended to you and let us know what they are. If you want reasonable clarification, about any of the disclosures, we are happy to provide it. To be very clear about the appraisals, I will send you the appraisals we are talking about via separate email.

WE WILL SET OUT OUR POSITION IN THE DOCUMENT REQUEST IN WRITING SO THERE IS NO MISUNDERSTANDING. I DO NOT NEED THE APPRAISALS SENT BACK TO ME. I HAD A SIMPLE QUESTION. THERE ARE SPECIFIC APPRAISALS LISTED AND THEN THERE IS A GENERAL CATEGORY OF APPRAISALS. I SIMPLY ASKED FOR CLARIFICATION WHETHER THERE WERE OTHER APPRAISALS YOU INTENDED TO USE OTHER THAN THOSE SPECIFICALLY LISTED.

4. Let's set aside the snide remarks and potshots. I have never aimed one at you. I expect the same level of professional courtesy in return.

I WHOLEHEARTEDLY AGREE THAT EVERYONE SHOULD KEEP THIS ENTIRE CASE ON A PROFESSIONAL LEVEL.

5. Can you clarify your proposal regarding deposition? We expect to go forward on Monday pursuant to the notice the Debtors sent the Committee. Mr. [redacted] will attend as the Committee's 30(b)(6) witness on Monday. I will attend to defend him and Mr. Pastor will attend on behalf of the movants. We will let you know if any additional people will attend.

I AM HAPPY TO CLARIFY WHICH I WILL DO IN A PHONE CALL. I WILL CALL YOU SHORTLY.

Ilan D. Scharf

Pachulski Stang Ziehl & Jones LLP

Tel: 212.561.7700 | Fax: 212.561.7777

ischarf@pszjlaw.com

[vCard](#) | [Bio](#) | [LinkedIn](#)



Los Angeles | San Francisco | Wilmington, DE | New York

From: Boswell, Susan G. (TUC x7713) [<mailto:Susan.Boswell@quarles.com>]

Sent: Thursday, October 08, 2015 8:48 PM

To: Ilan D. Scharf; Fella, Elizabeth (TUC x7755); James Stang; Robert Pastor; John 2 Manly; Vince Finaldi; Richard Fass; Don Kidd; Mazel Edward (edmazel@askewmazelfirm.com) (edmazel@askewmazelfirm.com); Mark Ish; Spector, David; Cygal, Everett (ecygal@schiffhardin.com)

Cc: Winkelman, Lori L. (PHX x3452)

Subject: RE: Diocese of Gallup - Debtor's September 4 document request [QBLLP-ACTIVE.FID37014021]

Ilan

I was out earlier and unable to respond in detail to your email below. Let me make sure that we are all clear on these issues. First, as to the informal request, no one has ever provided a response to the request in writing as requested in our September 9 call. I do not think it is too much to ask for a formal response.

Second, the request was directed to both the Committee and the Movants. So, the lack of any formal response as referenced above applies to both the Committee and the Movants so there is no doubt what I am talking about. As you know, we have yet to receive a scrap of paper from either of you.

Third, the "disclosure" without documents is also wholly inadequate. While there is no reason to produce docket entries to us or appraisals that we already, to list, for example: "All documents and records produced and or disclosed in Moya v. The Roman Catholic Church of the Diocese of Gallup filed in Coconino County Superior Court cause number CV2010-00713" is meaningless without copies of these documents. As you know, we did not handle the state court action nor should we be required to divine what "documents and records" are referenced. Similarly what other appraisals are you referring to in the Disclosure that are not specifically listed? Again, are we to divine what you are talking about?

Fourth, I am only mildly amused at your last statement about our request being burdensome and overly broad given, among other things, your document production request to the Debtors. Setting that aside for the moment, we are not the ones who started this process -- you are. When the Committee and the Movants chose to launch the lift stay and take the positions they have taken both in the moving papers and since, you had to know that we would be seeking appropriate discovery. Just as you expect a formal response from us with respect to your document request (which we are in the process of preparing), we expect the same from you.

To date, the Debtors have produced over 20,000 pages of documents to the Committee. We are in good faith reviewing to make sure that there are no other responsive documents to your request and will be providing a written response to the request. We expect nothing less from the Committee and the Movants.

Also, please let me know regarding my proposal for deposition so I can notify the court reporter. If you want to proceed, who will be attending so I can make sure we have an appropriate conference room.

From: Ilan D. Scharf [<mailto:ischarf@pszjlaw.com>]

Sent: Thursday, October 08, 2015 12:54 PM

To: Boswell, Susan G. (TUC x7713); Fella, Elizabeth (TUC x7755); James Stang; Robert Pastor; John 2 Manly; Vince Finaldi; Richard Fass; Don Kidd; Mazel Edward (edmazel@askewmazelfirm.com) (edmazel@askewmazelfirm.com); Mark Ish; Spector, David; Cygal, Everett (ecygal@schiffhardin.com)

Cc: Winkelman, Lori L. (PHX x3452)

Subject: RE: Diocese of Gallup - Debtor's September 4 document request [QBLLP-ACTIVE.FID37014021]

Susan,

We have asked Committee members to provide non-privileged documents and communications responsive to your requests. They confirmed that they do not have any non-privileged responsive documents and communications.

Any communications between PSZJ and the Committee (including their individual counsel) are clearly protected by the attorney-client privilege.

Any communications between PSZJ and the Movants' counsel are protected by the joint interest privilege.

Any documents that PSZJ created are work product.

The document requests are so broad that they would require us to sift through emails going back to shortly after our retention. As such, it would be unduly burdensome (and costly to the estate) to provide a privilege chart.

Ilan D. Scharf

Pachulski Stang Ziehl & Jones LLP

Tel: 212.561.7700 | Fax: 212.561.7777

ischarf@pszjlaw.com

[vCard](#) | [Bio](#) | [LinkedIn](#)



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
From: Boswell, Susan G. (TUC x7713) [<mailto:Susan.Boswell@quarles.com>]
Sent: Thursday, October 08, 2015 12:05 PM
To: Ilan D. Scharf; Fella, Elizabeth (TUC x7755); James Stang; Robert Pastor; John 2 Manly; Vince Finaldi; Richard Fass; Don Kidd; Mazel Edward (edmazel@askewmazelfirm.com) (edmazel@askewmazelfirm.com); Mark Ish; Spector, David; Cygal, Everett (ecygal@schiffhardin.com)
Cc: Winkelman, Lori L. (PHX x3452)
Subject: RE: Diocese of Gallup - Debtor's September 4 document request [QBLLP-ACTIVE.FID37014021]

Ilan

This email is nonresponsive to the request. In our call on September 9 when we discussed our informal document request, you and Robert indicated that either there were no responsive documents, you were collecting responsive documents that were not subject to objection or the documents requested were subject to an applicable privilege. I requested that you provide a response to the request either producing the documents, producing a privilege log or responding in writing that there were no documents responsive to the request. None of that has been done and your disclosure is not responsive to what we requested. That request was served on September 4. When will we get the documents, the privilege log and/or the response?



Susan Boswell / Partner

Susan.Boswell@quarles.com /  
One South Church Avenue, Suite 1700 / Tucson, AZ 85701-1621
Office 520-770-8713 / Cell 520-349-6644 / quarles.com

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From: Ilan D. Scharf [<mailto:ischarf@pszjlaw.com>]
Sent: Wednesday, October 07, 2015 3:00 PM
To: Fella, Elizabeth (TUC x7755); James Stang
Cc: Winkelman, Lori L. (PHX x3452); Boswell, Susan G. (TUC x7713)
Subject: RE: Diocese of Gallup - Debtor's September 4 document request [QBLLP-ACTIVE.FID37014021]

Elizabeth,

As discussed with Susan, any documents the Committee would produce with respect to the motions to lift the automatic stay are either publicly filed on the docket or documents that the Debtors produced to the Committee. Susan asked that the Committee disclose such documents

that we may rely on at the hearing. The Committee, along with the movants, did so in the attached disclosures on October 2.

To the extent we determine to rely upon any additional documents, we will supplement the disclosure.

Regards,

Ilan

Ilan D. Scharf

Pachulski Stang Ziehl & Jones LLP

Tel: 212.561.7700 | Fax: 212.561.7777

ischarf@pszjlaw.com

[vCard](#) | [Bio](#) | [LinkedIn](#)



Los Angeles | San Francisco | Wilmington, DE | New York

From: Fella, Elizabeth (TUC x7755) [<mailto:Elizabeth.Fella@quarles.com>]

Sent: Tuesday, October 06, 2015 12:42 PM

To: James Stang; Ilan D. Scharf

Cc: Winkelman, Lori L. (PHX x3452); Boswell, Susan G. (TUC x7713)

Subject: Diocese of Gallup - Debtor's September 4 document request [QBLLP-ACTIVE.FID37014021]

Jim and Ilan,

I understand that _____ deposition is scheduled for Monday. As of today, however, we have received no materials from you in response to the informal document request that we sent you on September 4. (I attached the request and transmittal email to this email).



Please advise as to when we will receive documents. If we will not be receiving any documents, please let us know.

Thank you,

Elizabeth



Elizabeth Fella / Partner

Elizabeth.Fella@quarles.com /  
One South Church Avenue, Suite 1700 / Tucson, AZ 85701-1621
Office 520-770-8755 / quarles.com

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From: Boswell, Susan G. [<mailto:Susan.Boswell@quarles.com>]
Sent: Friday, September 04, 2015 11:30 AM
To: Robert E. Pastor; John 2 Manly; James Stang; Vince Finaldi
Cc: Fella, Elizabeth (TUC x7755); edmazel@askewmazelfirm.com; dspector@schiffhardin.com; Richard Fass; Don Kidd; Ilan D. Scharf; Winkelman, Lori L. (PHX x3452); Davis, Jeffrey O. (MKE x1317)
Subject: RE: RCCDG\Lift Stay Hearing [QBLLP-ACTIVE.FID37014021]

Counsel

I will send comments to the proposed order later today or over the weekend.

Attached is our "informal" document request to the Movants and the Committee. I would like to know when you think we can respond with the documents or if we need to serve it formally and request shortened time from Judge Thuma.

In any event we can certainly work with you on a rolling production and dates depending upon when the depositions get scheduled, etc.

Susan G. Boswell
Attorney
Quarles & Brady LLP
One South Church Avenue
Suite 1700
Tucson, Arizona 85701-1621
Direct Line: (520) 770-8713
Direct Fax: (520) 770-2222
Mobile: (520) 349-6644
Susan.Boswell@quarles.com

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Exhibit D

Ilan D. Scharf

From: Robert E. Pastor <repastor@mjpattorneys.com>
Sent: Tuesday, October 13, 2015 1:31 PM
To: Boswell, Susan G. (TUC x7713); Winkelman, Lori L. (PHX x3452); Fella, Elizabeth (TUC x7755)
Cc: James Stang; Ilan D. Scharf; Iain Nasatir; John 2 Manly; Vince Finaldi
Subject: Diocese of Gallup - Lift Stay Motions

Susan & Lori:

Dan Brown is holding October 27 for his deposition in Boston. He will hold that date until the end of the week at which point he will release it for other matters. Please let us know if you intend to depose him on Oct. 27 in Boston.

I understand we discussed taking his deposition here in Phoenix and it was my understanding he was agreeable to traveling to Phoenix, however, his schedule changed and he is no longer able to fly out to Arizona on Monday Oct. 26 for an Oct. 27 deposition.

We will make Alfred Moya, , and available for deposition all we ask is you give us some reasonable notice so they can arrange their schedules.

Thank you.

Robert E. Pastor
Montoya, Jimenez & Pastor, P.A.
3200 N. Central Avenue, Suite 2550
Phoenix, Arizona 85012

repastor@mjpattorneys.com
Phone: 602-279-8969
Fax: 602-256-6667

Exhibit E

Ilan D. Scharf

From: Boswell, Susan G. (TUC x7713) <Susan.Boswell@quarles.com>
Sent: Tuesday, October 13, 2015 1:30 PM
To: Robert Pastor; Winkelman, Lori L. (PHX x3452)
Cc: Fella, Elizabeth (TUC x7755); Ilan D. Scharf; John 2 Manly; Vince Finaldi
Subject: RE: RCCDG [QBLLP-ACTIVE.FID37014021]

Robert

When you provide the documents and other information we have requested, we will be in a position to schedule Mr. Moya's and others depositions.



Susan Boswell / Partner
Susan.Boswell@quarles.com / [in](#) [bio](#)
One South Church Avenue, Suite 1700 / Tucson, AZ 85701-1621
Office 520-770-8713 / Cell 520-349-6644 / quarles.com

From: Robert E. Pastor [<mailto:repastor@mjpattorneys.com>]
Sent: Wednesday, October 07, 2015 3:59 PM
To: Winkelman, Lori L. (PHX x3452)
Cc: Fella, Elizabeth (TUC x7755); Ilan D Scharf; Boswell, Susan G. (TUC x7713); John Manly; Vince Finaldi
Subject: Re: RCCDG

Please let us know when you want depose Alfred Moya.

Robert E. Pastor
Montoya, Jimenez & Pastor, P.A.
3200 N. Central Avenue, Suite 2550
Phoenix, Arizona 85012

repastor@mjpattorneys.com
Phone: 602-279-8969
Fax: 602-256-6667

On Oct 7, 2015, at 2:24 PM, Winkelman, Lori L. (PHX x3452)
<Lori.Winkelman@quarles.com> wrote:

Robert,

I left a message with your assistant yesterday afternoon but had not heard back. I also spoke with Ilan. The debtors will be filing a motion to continue the evidentiary hearing currently scheduled to commence on November 10th.

Due to various factors including (among other things) that we have yet to receive documents and a written response from our document request, nor have we received Dan Browns report which was promised to us weeks ago, we do not have sufficient time or information to prepare our case.

Please respond to this email and confirm whether you consent to the continuance. Ilan has indicated that the Committee does not consent but we would like your response also since you are a movant.

If we don't hear back we will let the Court know that we did not hear back.

If you would like to discuss further, please let me know a number where I can contact you. I am currently sitting in the Albuquerque airport waiting for my flight. Thank you.



Lori Winkelman / Partner

Lori.Winkelman@quarles.com /  
Renaissance One, Two North Central Avenue / Phoenix, AZ 85004-2391
Office 602-229-5452 / quarles.com
Assistant Debra Lindsey 602-229-5294

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Exhibit F

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INCLUDES TORT CLAIMANTS' IDENTITIES**

**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
BISHOP OF THE ROMAN CATHOLIC CHURCH OF THE DIOCESE OF GALLUP, an Arizona corporation sole. This document applies to: <input checked="" type="checkbox"/> All Debtors	

The Official Committee of Unsecured Creditors of the Roman Catholic Church of the Diocese of Gallup and the Bishop of the Roman Catholic Church of the Diocese of Gallup (the "Committee"), along with Alfred Moya, and ¹ (the "Movants"), make the following disclosure relevant to the Movants' Motions for Relief from Automatic Stay (the "Motions").

Set forth below are the Movants' and Committee's disclosure of witnesses they are likely to call at an evidentiary hearing on the Motions and documents the Movants and Committee may seek to admit as evidence at an evidentiary hearing on the Motions. The Movants and the Committee reserve the right to supplement this list as discovery on the Motions progresses. The Movants and

¹ Movants filed confidential Tort Claims in these Chapter 11 cases. As such, their identities and the contents of their claims are confidential material and are subject to the terms of the *Stipulated Confidentiality Order Governing Production and Access to Confidential Material* [Docket No. 243], *Order Granting Partial Relief From Certain Orders and Approving Confidentiality and Non-Disclosure Agreement with New Mexico Property and Casualty Insurance Guaranty Association* [Docket No. 297] and *Order Fixing Time for Filing Proofs of Claim, Approving Claim Forms, and Approving Manner and Form of Notice* [Docket No. 218] and any other applicable stipulation, agreement or order governing treatment of confidential claims information in these Cases.

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Committee reserve the right to call any witness or use any document for impeachment at a hearing on the Motions.

A. The name and, if known, the address and telephone number of each person the Movants and the Committee may call as a witness at an evidentiary hearing on the Motions.

1. Movant
c/o Montoya, Jimenez & Pastor, P.A.
3200 N. Central Ave. Suite 2550
Phoenix, Arizona 85012

Movant filed her claim under seal. As such her identity is confidential.

2. Movant
c/o Montoya, Jimenez & Pastor, P.A.
3200 N. Central Ave. Suite 2550
Phoenix, Arizona 85012

Movant filed his claim under seal. As such his identity is confidential.

3. Alfred Moya
c/o Montoya, Jimenez & Pastor, P.A.
3200 N. Central Ave. Suite 2550
Phoenix, Arizona 85012

4. c/o Montoya, Jimenez & Pastor, P.A.
3200 N. Central Ave. Suite 2550
Phoenix, Arizona 85012

is Movant . Her examination may be arranged through the undersigned counsel to the Movants.

5. c/o Montoya, Jimenez & Pastor, P.A.
3200 N. Central Ave. Suite 2550
Phoenix, Arizona 85012

is Movant . His examination may be arranged through the undersigned counsel to the Movants.

6. c/o Montoya, Jimenez & Pastor, P.A.
3200 N. Central Ave. Suite 2550
Phoenix, Arizona 85012

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is Movant adult son. His examination may be arranged through the undersigned counsel to the Movants.

7. Dr. Daniel Brown, Ph.D.
997 Chestnut Street
Newton, MA 02464
617-244-1099

Dr. Brown's examination may be arranged through the undersigned counsel to the Movants.

8. Anthony L. Ruben, M.A.
13631 W. Desert Flower Drive
Goodyear, AZ 85395

Mr. Ruben is Movant former treating therapist. Neither the Movants nor the Committee expect to call him as a witness at trial.

9. Howard Markson
201 E. Lexington Avenue
Phoenix, Arizona 85012

Mr. Markson is Movant former treating therapist. His examination may be arranged through the undersigned counsel to the Movants.

10. Paul Pfaffenberger
Address Unknown

Mr. Pfaffenberger is a current treating therapist of Movant . His examination may be arranged through the undersigned counsel to the Movants.

11. Jean Sokol, LCSW
1400 N. Gilbert Road, Suite P
Gilbert, Arizona 85234

Ms. Sokol is a current treating therapist of Movant . Her examination may be arranged through the undersigned counsel to the Movants.

12. / Committee 30(b)(6) witness
c/o Pachulski Stang Ziehl & Jones LLP
780 Third Avenue, 34th Floor
New York, NY 10017

13. Bishop James S. Wall
c/o Susan Boswell
Quarles & Brady LLP
One South Church Avenue, Suite 1700
Tucson, Arizona 85701

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14. Deacon James Hoy
c/o Susan Boswell
Quarles & Brady LLP
One South Church Avenue, Suite 1700
Tucson, Arizona 85701
15. The Roman Catholic Church of the Diocese of Gallup / 30(b)(6) witnesses
c/o Susan Boswell
Quarles & Brady LLP
One South Church Avenue, Suite 1700
Tucson, Arizona 85701
16. Any and all witnesses listed or referred to in discovery (formal & informal), depositions, or disclosure statements (formal & informal). As discovery is ongoing, the Committee / Movants will supplement with additional witnesses and information as it becomes available.

B. List of documents the Movants and the Committee may seek to admit as evidence at an evidentiary hearing on the Motions.

1. Father Clement Hageman – Debtor's file
2. Father Raul Sanchez – Debtor's file
3. Bro. Mark Schornack – Debtor's file
4. Bro. Mark Schornack – Franciscan St. John the Baptist Province's file
5. The Roman Catholic Church Diocese of Gallup –
www.dioceseofgallup.com/credibly-accused
6. Headquarters West, Ltd. – Broker Opinion of Value – 03/30/2015
7. Estate Valuation Consultants Inc. – Chancery Office – 2/23/2015
8. Estate Valuation Consultants Inc. – Sacred Heart Catholic School – 03/19/2015
9. Lease Agreement – Bashas / K-Mart at Winslow, AZ
10. Lease Agreement – Pay and Save Inc.
11. Ground Lease – North Park Drive – Winslow, AZ
12. Lease Agreement – Basilio DiGregorio et al
13. Deposition of Bishop James S. Wall – 9/18/2013
14. Deposition of Father Alfred Tachias – 9/18/2013
15. Catholic Peoples Foundation – documents produced – CPF0001 – CPF000322

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16. All documents and records produced and or disclosed in *Moya v. The Roman Catholic Church of the Diocese of Gallup* filed in Coconino County Superior Court cause number CV2010-00713.
17. Any and all documents and records listed in Debtor's and/or Committee / Movant's disclosure statements, discovery responses, and/or found through discovery and disclosure.
18. All Monthly operating reports filed in the Debtors' chapter 11 cases.
19. All appraisals and brokers opinions of value obtained by the Debtors and during the Debtors' chapter 11 cases.
20. All Tort claims asserted in the Debtors' chapter 11 cases.
21. All insurance policies and related documents (including declarations, certificates of insurance, applications, and correspondence related thereto) of the Debtor, including insurance policies issued by The Catholic Mutual Relief Society of America and/or The Catholic Relief Insurance Company of America ("Catholic Mutual") and Home Insurance Company.
22. All demands by the Debtors to Catholic Mutual and Home Insurance Company, including through New Mexico Property Casualty Insurance Guaranty Association
23. Roman Catholic Church of the Diocese of Gallup Chapter 11 case Docket Nos. (Case No. 13-13676): 10; 14; 19; 20; 27; 66; 67; 142; 143; 145; 209; 218; 230; 231; 232; 236; 239; 249; 250; 251; 254; 236; 263; 278; 281; 303; 308; 333; 334; 336; 338; 339; 341; 347; 350; 353; 357; 359; 374; 377; 383; 385; 393; 394; 396; 397; 398; 402; 403; 411; 415; 418; 419; 420; 421; 422; 423; 425; 426; 427; 430; 433; 434; 435; 439; 440.
24. Bishop of the Roman Catholic Church of the Diocese of Gallup Chapter 11 case Docket Nos. (Case No. 13-13677): 44; 45; 57; 58; 60; 61; 63; 64; 66; 67; 68; 69; 70; 71; 72; 73; 74; 75; 76; 77; 79; 80; 81; 82.
25. All Documents filed in *Moya v. Roman Catholic Church of the Diocese of Gallup*, et al., Adv. No. 14-01034.
26. All Documents filed in *John M.H. Doe v. Roman Catholic Church of the Diocese of Gallup*, et al., Adv. No. 14-01033.

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Dated: October 2, 2015

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