

**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>	<p>Chapter 11</p> <p>Case No. 13-13676-t11</p> <p>Jointly Administered with:</p> <p>Case No. 13-13677-t11</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 style="text-align: center;"><input checked="" type="checkbox"/> All Debtors.</p> <p style="text-align: center;"><input type="checkbox"/> Specified Debtor.</p>	

**OFFICIAL COMMITTEE OF UNSECURED CREDITORS’
MOTION FOR 2004 EXAMINATION (FRANCISCAN FRIARS,
PROVINCE OF ST. JOHN THE BAPTIST) (THE “MOTION”)**

Under Bankruptcy Rule 2004(a), 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 (collectively, the “Debtors”) respectfully requests that the Court enter an Order compelling the Franciscan Friars, Province of St. John the Baptist (“Franciscan Friars, Province of St. John the Baptist”) to produce the documents requested in Exhibit “A” which is incorporated by this reference. The documents should be produced to:

Pachulski Stang Ziehl & Jones LLP
Attn: James I. Stang
10100 Santa Monica Blvd., 13th Floor
Los Angeles, CA 90067

The Committee requests that the Franciscan Friars, Province of St. John the Baptist produce all documents within twenty-one (21) days after entry of an Order granting this Motion, and at such times as any additional responsive documents are acquired or become available.

MEMORANDUM OF POINTS AND AUTHORITIES

I. JURISDICTION.

The Court has jurisdiction over this Motion by 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2). Venue of this proceeding and this Motion is proper under 28 U.S.C. §§ 1408 and 1409. The basis for the relief requested is Rule 2004 of the Federal Rules of Bankruptcy Procedure (“Rule 2004”).

II. BACKGROUND.

The New Mexico Debtors’ schedules report that the Debtor has unliquidated and contingent claims against the Franciscan Friars, Province of St. John the Baptist. *See* Schedule B (Personal Property, l. 21). It is a province of a religious order named Ordo Fratrum Minorum (the “Franciscan Friars”). Provinces are geographic areas. Members of the order also are members of a particular province. Before 1985, the Franciscan Friars serving in the Diocese of Gallup were members of the St. John the Baptist Province. On January 3, 1985, the Province of Our Lady of Guadalupe was created and all or substantially all of the Franciscan Friars serving in the Southwest United States (including the Diocese of Gallup) became members of the Province of Our Lady of Guadalupe.

Twelve sexual abuse proofs of claim were filed alleging abuse perpetrated by members of the Franciscan Friars, Province of St. John the Baptist or its successor and at least twenty-two (22) sexual abuse claims were filed alleging abuse perpetrated during the tenures of Bishop Espelage (1940 to 1969), a member of the Franciscan Friars, Province of St. John the Baptist Province and retired Vicar General/Chancellor Bro. Duane Torisky, also a Franciscan Friar. The Debtor has admitted there are credible allegations of sexual abuse against members of the Franciscan Friars, Province of St. John the Baptist or its successor, the Province of Our Lady of

Guadalupe (i.e. Fathers Charles Cichanowicz, Julian Hartig, Diego Mazon) and during the tenure of Bishop Espelage, a member of the Franciscan Friars, St. John the Baptist Province, the predecessor of the Province of Our Lady of Guadalupe and retired Vicar General/Chancellor Bro. Duane Torisky, also a Franciscan Friar. The following sexual abuse claims were filed in the Debtors' cases identifying perpetrators who are or may be Franciscans:

Fr. Ephraim Beltrenea (Claim no. 6; abused alleged between 1970-1972);

Fr. Eugene Botello (Claim no. 37; abuse alleged to have occurred between 1962-1965);

Fr. Crispin Butz (Claim no. 7; abuse alleged to have occurred between 1960-1963);

Fr. Finnian Connolly (Claim no. 7; abuse alleged to have occurred between 1960-1963);

Fr. Julian Hartig (Claim no. 1; abuse alleged to have occurred between 1961-1962);

Br. Mark Schornack (Claim no. 45; abuse alleged to have occurred in 1979 and Claim no. 46; abuse alleged to have occurred between 1972-1973) and

Fr. Clemetine Wottle (Claim no. 55; abuse alleged to have occurred between 1965-1970).

Members of the Franciscan Friars, regardless of where they serve and regardless of the capacity in which they are serving, are subject to the authority of the Minister Provincial, the leader of their province and the Minister General, the religious superior of the Franciscan Friars worldwide (and the authority of the bishop of the diocese where they serve). Until 1985 and the creation of the Province of Our Lady of Guadalupe, all Franciscan Friars serving in the Diocese of Gallup were subject to the authority of the Minister Provincial of the St. John the Baptist Province and the Minister General of the Franciscan Friars. After 1985, the Committee believes that all Franciscan Friars serving in the Diocese of Gallup were subject to the authority of the Minister Provincial of the Province of Our Lady of Guadalupe and the Minister General.

In April 2014, Committee counsel sent counsel for the Franciscan Friars, Province of St. John the Baptist a draft of this Motion and invited counsel to discuss the voluntary production of

the documents. That draft did not include references to claims other than those against Fr. Schornack because he was the only perpetrator known to the Committee. Subsequently, the Committee learned of the allegations against other Franciscan personnel from filed proofs of claim. Counsel for the Franciscan Friars, Province of St. John the Baptist objected to the April 2014 request contending that a prejudgment request for financial information was inappropriate (an argument this Court rejected when it approved a similar request for documents from the Diocese of Corpus Christi), disputing the veracity of the claim against Fr. Schornack and objecting to production of insurance policies that cover Bishop Espelage's tenure. Based on that response, the Committee does not believe that the Franciscan Friars, Province of St. John the Baptist will voluntarily produce the requested documents without a court order.

The Committee and the Debtors also have discovered evidence that the Franciscan Friars, Province of St. John the Baptist had insurance for at least one parish in the Diocese. The Committee is informed by Debtors' counsel that weeks ago it asked the Franciscan Friars, Province of St. John the Baptist to review its own files for evidence of other insurance. The Committee is informed that the Debtors have received no substantive response to their request.

III. ARGUMENT.

The New Mexico Debtor states it has contribution and indemnification causes of action against the Franciscan Friars, Province of St. John the Baptist. Other causes of action also may exist, e.g., negligent supervision, negligent nondisclosure, negligent misrepresentation. The Committee believes the causes of action arise from its authority over members who sexually abused children or who administered the Gallup of Diocese when abuse occurred, i.e. Bishop Espelage and Vicar General/Chancellor Torisky. Assertions of contribution and indemnity claims between Church entities are not new. The Diocese of New Ulm (Minnesota) is suing the

Diocese of Clogher Ireland and the Servants of the Paracletes (a treatment center) for contribution and indemnity. *See* Answer of Diocese of New Ulm to Amended Complaint and Third- Party Complaint (attached hereto as Exhibit B)) filed in a Minnesota state court action entitled *John Doe 103 v. Diocese of New Ulm*, Case No. 08-CV-13-498. In addition, the Diocese of Fairbanks (Catholic Bishop of Northern Alaska (Bankr. D. Alaska, Case no. 08-00110-DMD)), asserted contribution and indemnity claims against the Society of Jesus, Oregon Province, who provided the Diocese of Fairbanks most of its priests and bishops, and stated that it might have claims against the Brothers of St. Francis, the Sisters of Saint Ann and certain orders of religious women. The Society of Jesus, Oregon Province filed a proof of claim in the Diocese of Fairbanks chapter 11 case for allocation of fault or other indemnification. The Ursuline Sisters of the Western Province filed a proof claim against the Diocese of Helena in the Diocese's chapter 11 case regarding abuse that occurred within the Diocese at a school allegedly administered by the sisters.

The purpose of the Motion is twofold: first, to determine whether the Franciscan Friars, Province of St. John the Baptist is financially viable to respond to a judgment before the estate incurs fees and costs to litigate its liability. For this purpose, the Committee seeks: (a) current financial statements from the Franciscan Friars, Province of St. John the Baptist and (b) documents relating to insurance that might cover sexual abuse claims filed in the cases, including claims relating to any personnel of the Franciscan Friars, Province of St. John the Baptist working in, serving in or assigned to the Diocese of Gallup.

The Committee has done an internet search and cannot locate any of the sought-after financial statements. The Committee has tailored this request for financial document to reflect the Court's ruling on an analogous Rule 2004 motion directed to the Diocese of Corpus Christi.

The Committee seeks insurance documents dating back to 1940 because Bishop Espelage's tenure began that year. While none of the proofs of claim allege abuse prior to 1947, the Committee counsel's experience is that a resolution of the estates' insured claims will include a buy-back of all existing policies regardless of claims in a given year.

The Motion's second purpose is to obtain any documents that evidence the relationship of the Franciscan Friars, Province of St. John the Baptist to the Diocese of Gallup and the alleged perpetrators identified above. These documents will enable the Committee to determine the legal validity of the theories that the estate may have claims against the Franciscan Friars, Province of St. John the Baptist.

The Committee requests the Court grant its motion for 2004 examination and compel the Franciscan Friars, Province of St. John the Baptist to produce all documents as requested in, and under, Exhibit "A" attached hereto and incorporated by reference. The Committee requests that all such documents be produced within twenty-one (21) days after entry of an Order granting this motion (or such other date and time as the Franciscan Friars, Province of St. John the Baptist and the Committee may subsequently agree), at the offices of Pachulski Stang Ziehl & Jones LLP, Attn: James I. Stang, 10100 Santa Monica Blvd., 13th Floor, Los Angeles, CA 90067.

IV. CONCLUSION.

Based on the foregoing, and for good cause shown, the Committee respectfully requests the Court enter an Order:

A. Directing the Franciscan Friars, Province of St. John the Baptist to produce the documents requested in, and under, Exhibit "A" at the dates and times set forth herein; and

B. Granting such other relief as is just under the circumstances.

Dated: October 30, 2014

Respectfully submitted,

PACHULSKI STANG ZIEHL & JONES LLP

By /s/ James I. Stang

James I. Stang (admitted pro hac vice)
PACHULSKI STANG ZIEHL & JONES LLP
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Counsel for the Official Committee of
Unsecured Creditors

EXHIBIT "A"

I. INSTRUCTIONS

A. You must investigate and produce all Documents (as defined below) in your possession, custody, and control including all Documents in the possession, custody and control of your attorneys, investigators, experts, officers, trustees, Persons, directors, employees, agents, representatives, and anyone acting on Your behalf.

B. Using either the singular or plural shall not be deemed a limitation. Using the singular should be considered to include the plural and vice versa.

C. The words "and," "or," and "and/or" are interchangeable and shall be construed either disjunctively or conjunctively or both, as broadly as necessary to bring within the Request those responses that might otherwise be construed to be outside the scope.

D. If You cannot comply with a particular category(ies) of the requests below and Documents responsive to the category exist, state the following information:

1. The date of the Document;
2. The type of Document (*e.g.*, letter, memorandum, report, etc.);
3. The name, address, telephone number and title of the author(s) of the Document;
4. The name, address, telephone number and title of each recipient of the Document;
5. The number of pages in the Document;
6. The document control number, if any;
7. The present location(s) of the Document and the name, address and telephone number of the person(s) who has (have) possession of the Document;
8. A description of the subject of the Document;

9. The reason the Document cannot be produced or why you cannot comply with the particular category of request.

E. You are under a continuing duty to timely amend your written response and to produce additional Documents if you learn that the response is in some material respect incomplete or incorrect and if the additional or corrective information has not otherwise been made known to the Plaintiff during the discovery process or in writing.

F. You must produce the full and complete originals, or copies if the originals are unavailable, of each Document responsive to the categories below with all non-identical copies and drafts in its or their entirety, without abbreviations, excerpts, or redactions. Copies may be produced in lieu of originals if the entirety (front and back where appropriate) of the Document is reproduced and the Responding Party or its authorized agent or representative states by declaration or affidavit under penalty of perjury that the copies provided are true, correct, complete, and an accurate duplication of the original(s).

G. You must produce the Documents as they are kept in the usual course of business or your operations, or to organize and label them to correspond with each category in these requests.

H. You must produce Electronically Stored Information in searchable form on DVDs or CD-ROMs.

I. For Documents in paper format:

1. Documents must be scanned and produced electronically in single page TIFF format with corresponding OPT file, DAT file, and OCR or extracted text and .lst file.

2. To the extent available, provide Beginning Production Number, Ending Production Number, Folder information, custodian information and family information.

J. For Documents that contain Electronically Stored Information, the following guidelines are to apply:

1. Single page, Group IV TIFFs with links to native files (for Excel or similar spread sheet or accounting files, at a minimum) with corresponding OPT file, DAT file, and OCR or extracted text and .lst file.

2. Maintain family integrity.

3. Perform custodian-level reduplication.

4. Concordance standard delimited DAT load file with the following metadata fields: Beginning Production Number, Ending Production Number, Beginning Attachment Number, End Attachment Number, Family ID, Page Count, Custodian, Original Location Path, Email Folder Path, Document Type, Doc Author, Doc Last Author, Comments, Categories, Revisions, File Name, File Size, MD5 Hash, Date Last Modified, Time Last Modified, Date Created, Time Created, Date Last Accessed, Time Last Accessed, Date Sent, Time Sent, Date Received, Time Received, To, From, CC, BCC, Email Subject, Path to Native, Path to Full Text, Original Time Zone.

5. OCR or extracted text for all ESI: (a) Separate .txt files corresponding to beginning production number of each document; (b) Separate .lst file for fulltext.

6. Process all data in GMT and provide a metadata field indicating original time zone.

K. If you withhold or redact a portion of any Document under a claim of privilege or other protection, each such Document must be identified on a privilege log, which shall be produced contemporaneously with the non-privileged Documents responsive to this Request for Production, and which privilege log shall state the following information:

1. The date of the Document;
2. The Document (*e.g.*, letter, memorandum, report, etc.);
3. The name, address, telephone number and title of the author(s) of the Document;
4. The name, address, telephone number and title of each recipient of the Document;
5. The number of pages in the Document;
6. The document control number, if any;
7. The present location(s) of the Document and the name, address and telephone number of the persons) who has (have) possession of the Document;
8. A general description of the subject of the Document or the portion redacted without disclosing the asserted privileged or protected communication;
9. The privilege(s) or protection(s) that you contend applies.

II. DEFINITIONS

Unless otherwise stated, the following definitions shall apply to these Requests:

1. “Bankruptcy Cases” means and refers to the chapter 11 cases of the Roman Catholic Church of the Diocese of Gallup, a New Mexico corporation sole and Bishop of the Roman Catholic Church of the Diocese of Gallup, an Arizona corporation sole and pending in the United States Bankruptcy Court for the District of New Mexico under the jointly administered cases captioned as *In re Roman Catholic Church of the Diocese of Gallup.*, Case No. 13-13676-t11.
2. “Diocese of Gallup” means and refers to Roman Catholic Church of the Diocese of Gallup and Bishop of the Roman Catholic Church of the Diocese of Gallup, debtors

in the Bankruptcy Cases; and Each (regardless of affiliation with a religious order) of their parishes, churches, missions, camps and schools, predecessors and successors in interest; and Each of their affiliates; and Each of their present and former officers, directors, trustees, Persons, communities, attorneys, agents, servants, employees, representatives, brothers, councils, committees, and any other Person acting on its behalf or otherwise subject to its control. Upon information and belief, the term Diocese of Gallup refers to both the secular legal entity and the juridic person or religious entity.

3. “Communications” means and includes all oral and written communications of any nature, type or kind including, but not limited to, any Documents, telephone conversations, discussions, meetings, facsimiles, e-mails, pagers, memoranda, and any other medium through which any information is conveyed or transmitted.

4. “Concerning” means and includes relating to, constituting, defining, evidencing, mentioning, containing, describing, discussing, embodying, reflecting, edifying, analyzing, stating, referring to, dealing with, or pertaining to.

5. “Document” is used in the broadest possible sense as specified in and interpreted under Rule 34 of the Federal Rules of Civil Procedure. Where any otherwise duplicate document contains any marking not appearing on the original or is altered from the original, then such item shall be a separate original document. Any Document that contains any comment, notation, addition, insertion or marking of any type or kind not part of another Document, is to be a separate Document.

6. “Each” shall mean each and every.

7. “Electronically Stored Information” or “ESI” means, without limitation, all information on any computing device owned, maintained, or otherwise controlled by You,

including, but not limited to, mainframe, desktop, laptop, tablet, or palmtop computers, network servers, telephone voicemail servers, employees' employer-provided home computers, and the personal digital assistants (PDAs), digital cell phones, telephone answering machines, pagers, or other information-storing electronic devices of You and Your employees, or on associated external storage media, backup tapes, and other archival copies of same. Unless otherwise specified, documents, reports, and other Electronically Stored Information created using any version of Microsoft Word, Outlook, Powerpoint, Excel, Visio, or Access, Word Perfect, Oracle, or any other Microsoft, Adobe, Corel or other available "off-the-shelf" application shall be produced in native form; that is, the form in which the document is stored on whatever media it resides. The document should not be locked, resaved, restructures, "scrubbed" of unapparent or hidden content or any other data or metadata, but rather should be produced in a copy precisely reproducing its entire state as present in Your systems. Unless otherwise specified, electronic mail (e-mail) should be produced in native form; that is, in whatever database and/or file/directory structures are used by Your mail processing software. All metadata and other unapparent or hidden data related to mail messages shall be produced, including, but not limited to, any file attachments, message priority flags, message read/access timestamps, and of e-mail sent to distribution lists, information on the Personship of such lists when the e-mail was sent.

8. "Financial Statements" means annual income statements, balance sheets and cash flow statements, regardless of whether the statements are audited or reviewed.

9. "Franciscan Friars, Province of St. John the Baptist" or "Province of St. John the Baptist" means the Franciscan Friars, Province of St. John the Baptist and the geographic area thereof and Each of its predecessors and successors in interest; and Each of its affiliates; and Each of its present and former officers, directors, trustees, Persons, communities,

attorneys, agents, servants, employees, representatives, councils, committees, Members and any other Person acting on its behalf or otherwise subject to its control. The term Franciscan Friars, Province of St. John the Baptist refers to both the secular legal entity and the juridic person or religious entity and Minister Provincial of the Franciscan Friars, Province of St. John the Baptist.

10. “Insurance Policy” means and refers to any liability, comprehensive general liability, commercial general liability, errors and omissions, directors and officers liability, umbrella and excess liability insurance policy, and any other insurance policy that provides, in whole or in part, insurance coverage for any tort claims as well as any Document that evidences the existence of an Insurance Policy, including but not limited to binders, premium notices, billings or statements or cancelled checks, confirmations, rejections, renewals or cancellations of coverage, endorsements or Documents concerning insurance coverage.

11. “Member” means a priest, brother, postulant, novitiate, a temporary professed friar and a solemn professed friar.

12. “Person” means and includes individuals and entities, civil or canonical, including, but not limited to, Members, communities, houses, ministries, regions, funds, missions, or apostolic institutions, as those terms are used under the laws of the Roman Catholic Church, for profit and not for profit corporations, partnerships, unincorporated associations, limited liability companies, trusts, firms, cooperatives, fictitious business names, educational institutions, governmental agencies whether local, state, or federal, and all of their agents, representatives, employees, predecessors, any other Person acting on its/their behalf or subject to its/their control and/or any Person identified or referenced in a worker’s compensation policy.

13. “You”, “Your”, and “Yours” means and refers to the Franciscan Friars, Province of St. John the Baptist.

III. REQUESTS FOR PRODUCTION

1. All Documents that indicate or claim that Diocese of Gallup is a named insured, an additional insured or is otherwise insured under any Insurance Policy issued to or paid for by You between 1940 and 2013.

2. All Documents Concerning, constituting or evidencing, in whole or in part, any Insurance Policy issued to or paid for by You between 1940 and 2013, under which Diocese of Gallup is a named insured, an additional insured, or is otherwise insured.

3. All Documents between You and representative of a provider of an Insurance Policy Concerning or constituting any Communications sent or received between 1940 and 2013 Concerning any claim or lawsuit of any kind against the Diocese of Gallup (regardless of whether it is also against You), defended or settled, in whole or in part, by any insurance company or companies.

4. All Documents Concerning or evidencing any payment made by You, or to anyone acting on Your behalf, between 1940 and 2013, for the purchase of an Insurance Policy on behalf of the Diocese of Gallup.

5. All Documents Concerning any Member of the Franciscan Friars, Province of St. John the Baptist assigned to, working in or serving in the Diocese of Gallup.

6. All Insurance Policies Concerning You for the period between 1940 and 2013.

7. All Documents Concerning, constituting or evidencing, in whole or in part, any Insurance Policy issued to or paid for by You between 1940 and 2013, under which any Person ever under the jurisdiction of the Franciscan Friars, Province of St. John the Baptist who

served in, worked in or was assigned to the Diocese of Gallup Diocese of Gallup is a named insured, an additional insured, or is otherwise insured.

8. All Documents that indicate or claim that any Person ever under the jurisdiction of the Franciscan Friars, Province of St. John the Baptist assigned to, worked in or served in the Diocese of Gallup is insured under any workers' compensation insurance policy issued to or paid for by You between 1940 and 2013.

9. All Documents Concerning or constituting any Communications sent or received between 1940 and 2013 Concerning any claim or lawsuit of any kind against any Person ever under the jurisdiction of the Franciscan Friars, Province of St. John the Baptist who served in, worked in or was assigned to the Diocese of Gallup (regardless of whether it is also against You), for which Person notice of a claim was provided under an Insurance Policy and/or the claim was defended or settled by any insurance company.

10. All Documents Concerning or evidencing any payment made to You, or to anyone acting on Your behalf, between 1940 and 2013, for the purchase of insurance on behalf of any Person ever under the jurisdiction of the Franciscan Friars, Province of St. John the Baptist who served in, worked in or was assigned to the Diocese of Gallup.

11. All of Your Financial Statements for 2013 and 2014.

12. All Documents Concerning the Diocese of Gallup.

13. All Documents concerning:

- a. Fr. Bernard T. Espelage
- b. Bro. Duane Torisky
- c. Fr. Ephraim Beltreamea;
- d. Fr. Eugene Botello;

- e. Fr. Crispin Butz;
- f. Fr. Finnian Connolly;
- g. Fr. Julian Hartig;
- h. Br. Mark Schornack and
- i. Fr. Clemetine Wottle

CERTIFICATE OF SERVICE

Under F.R.C.P. 5(b)(3), F.R.B.P. 9036 and NM LBR 9036-1(b), I certify that service of the foregoing “OFFICIAL COMMITTEE OF UNSECURED CREDITORS’ MOTION FOR 2004 EXAMINATION (FRANCISCAN FRIARS, PROVINCE OF ST. JOHN THE BAPTIST)” will be made on October 30, 2014 as follows:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

- Ronald Andazola on behalf of U.S. Trustee United States Trustee - ronald.andazola@usdoj.gov
- James A Askew on behalf of Creditor New Mexico Property Casualty Insurance Guaranty Association - jaskew@askewmazelfirm.com, askewmazesign@gmail.com; ssaccoccia@askewmazelfirm.com; ritalush@askewmazelfirm.com; awalkowiak@askewmazelfirm.com
- Randy S. Bartell on behalf of Interested Party Catholic Mutual Relief Society of America - rbartell@montand.com
- Jennie D Behles on behalf of Interested Party William Michael Mulvey - filings@jdbehles.com, tammir@jdbehles.com; lawfirm@jdbehles.com
- Susan Gayle Boswell on behalf of Debtor Bishop of the Roman Catholic Church of the Diocese of Gallup - susan.boswell@quarles.com, kelly.webster@quarles.com; docketaz@quarles.com; jessica.cenedese@quarles.com
- Susan Gayle Boswell on behalf of Debtor Roman Catholic Church of the Diocese of Gallup - susan.boswell@quarles.com, kelly.webster@quarles.com; docketaz@quarles.com; jessica.cenedese@quarles.com
- Susan Gayle Boswell on behalf of Defendant Roman Catholic Church of the Diocese of Gallup - susan.boswell@quarles.com, kelly.webster@quarles.com; docketaz@quarles.com; jessica.cenedese@quarles.com
- Gillian Nicole Brown on behalf of Creditor Committee Official Committee of Unsecured Creditors - gbrown@pszjlaw.com
- Kenneth Harris Brown on behalf of Creditor Committee Official Committee of Unsecured Creditors - kbrown@pszjlaw.com
- Robert M. Charles, Jr. on behalf of Creditor Catholic Peoples Foundation - RCharles@LRRLaw.com, BankruptcyNotices@LRRLaw.com
- Robert M. Charles, Jr. on behalf of Interested Party PARISH STEERING COMMITTEE OF ROMAN CATHOLIC CHURCH OF THE DIOCESE OF GALLUP - RCharles@LRRLaw.com, BankruptcyNotices@LRRLaw.com
- Everett J. Cygal on behalf of Interested Party Catholic Mutual Relief Society of America - ecygal@schiffhardin.com
- Louis T. DeLucia on behalf of Interested Party Catholic Mutual Relief Society of America - ldelucia@schiffhardin.com

- J. Daryl Dorsey on behalf of Interested Party Southwest Indian Foundation, Inc. - jdd@tblaw.com
- Richard T. Fass on behalf of Creditor John Doe - bmccormick@perdueandkidd.com, dkidd@perdueandkidd.com;bmccormick@perdueandkidd.com;dkurc@perdueandkidd.com
- Richard T. Fass on behalf of Creditor John Doe - rfass@perdueandkidd.com, dkidd@perdueandkidd.com;bmccormick@perdueandkidd.com;dkurc@perdueandkidd.com
- Elizabeth Sarah Fella on behalf of Debtor Bishop of the Roman Catholic Church of the Diocese of Gallup - elizabeth.fella@quarles.com, linda.vaubel@quarles.com;docketaz@quarles.com
- Elizabeth Sarah Fella on behalf of Debtor Roman Catholic Church of the Diocese of Gallup - elizabeth.fella@quarles.com, linda.vaubel@quarles.com;docketaz@quarles.com
- Alyson M. Fiedler on behalf of Interested Party Catholic Mutual Relief Society of America -afiedler@schiffhardin.com
- Susan M. Freeman on behalf of Creditor Catholic Peoples Foundation - SFreeman@LRRLaw.com, SClark@LRRLaw.com;MSchoenike@LRRLaw.com
- Susan M. Freeman on behalf of Creditor Catholic Peoples Foundation - SFreeman@LRRLaw.com, SClark@LRRLaw.com;MSchoenike@LRRLaw.com
- Bonnie Bassan Gandarilla on behalf of Interested Party Southwest Indian Foundation, Inc. -mbglaw@swcp.com, bbg11usc@swcp.com
- Justin J. Henderson on behalf of Creditor Catholic Peoples Foundation - JHenderson@LRRLaw.com
- Charles R. Hughson on behalf of Creditor St. Bonaventure Indian Mission & School - crhughso@rodey.com, jmedfor@rodey.com
- Charles R. Hughson on behalf of Plaintiff Saint Bonaventure Indian Mission and School, Inc. - crhughso@rodey.com, jmedfor@rodey.com
- Steven D Jerome on behalf of Creditor Roman Catholic Church of the Diocese of Phoenix - sjerome@swlaw.com, mminnick@swlaw.com;docket@swlaw.com
- Dennis E Jontz on behalf of Creditor Catholic Peoples Foundation - DJontz@LRRLaw.com, jhenderson@lrrlaw.com;mlucero@lrrlaw.com
- Christopher R Kaup on behalf of Interested Party Southwest Indian Foundation, Inc. - crk@tblaw.com, ramchugh@tblaw.com
- William R Keleher on behalf of Respondent BP America Production Co. - wkeleher@modrall.com, sandys@modrall.com;sle@modrall.com;dolores@modrall.com
- Donald Hamilton Kidd on behalf of Creditor John Doe - dkidd@perdueandkidd.com
- Jonathan J. Kim on behalf of Creditor Committee Official Committee of Unsecured Creditors - jkim@pszjlaw.com
- Leonard K Martinez-Metzgar on behalf of U.S. Trustee United States Trustee - leonard.martinez-metzgar@usdoj.gov
- Edward Alexander Mazel on behalf of Creditor New Mexico Property Casualty Insurance Guaranty Association - edmazel@askewmazelfirm.com, dwhite@askewmazelfirm.com;jortiz@askewmazelfirm.com;pstice@askewmazelfirm.com;ssaccoccia@askewmazelfirm.com;ritalush@askewmazelfirm.com;awalkowiak@askewmazelfirm.com;askewmazalign@gmail.com

- George M Moore on behalf of Interested Party Southwest Indian Foundation, Inc. - mbglaw@swcp.com, gmm11usc@swcp.com
- Stephanie L Schaeffer on behalf of Debtor Bishop of the Roman Catholic Church of the Diocese of Gallup - sschaeffer@walkerlawpc.com, keggleston@walkerlawpc.com; WalkerLawPC14@gmail.com
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