

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:

Case No. 20-60337

THE DIOCESE OF ST. CLOUD,
a Minnesota religious corporation

Chapter 11

Debtor.

Judge Robert J. Kressel

**SUPPLEMENTAL DECLARATION OF ROBERT T. KUGLER IN SUPPORT OF
APPLICATION TO EMPLOY STINSON LLP AS LEGAL COUNSEL
FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS**

Robert T. Kugler, Esq., makes the following supplemental declaration (“Supplemental Declaration”) in support of the Application (“Application”) of the Official Committee of Unsecured Creditors (“Committee”) to employ Stinson LLP as its legal counsel effective as of June 17, 2020.

1. I am a partner in the law firm of Stinson LLP (“Stinson”), which maintains offices for the practice of law at, among other locations, 50 South Sixth Street, Suite 2600, Minneapolis, Minnesota, 55402. I am duly admitted to practice law in the State of Minnesota, the United States Court of Appeals for the Eighth Circuit, United States District Court for the District of Minnesota, the United States District Court for the Northern District of California, and the United States District Court for the Western District of Wisconsin.

2. I submit this Supplemental Declaration in support of the Application of the Committee pursuant to sections 328 and 1103 of Title 11 of the United States Code (the “Bankruptcy Code”), Rule 2014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 2014-1 of the Local Rules of Bankruptcy Procedure (“Local Rules”), for entry of an order authorizing the employment and retention of Stinson as counsel to the Committee, effective as of June 17, 2020.

3. Except as otherwise indicated, the facts set forth in this Supplemental Declaration are personally known to me and, if called as a witness, I could and would testify thereto.

4. To the extent that any information disclosed herein requires supplementation, amendment or modification upon Stinson's completion of further analysis or as additional information becomes available to it, a supplement to this Declaration will be filed with the Court.

5. In the Declaration of Robert T. Kugler in support of the Application of the Official Committee of Unsecured Creditors to employ Stinson LLP as its legal counsel (the "Initial Declaration"), Stinson disclosed that certain of its attorneys currently serve on the boards of directors for estate creditors identified on **Exhibit 3** attached thereto. The list of Stinson attorneys currently serving on the boards of directors for estate creditors is attached hereto as **Exhibit 1**.

6. While the entities listed on **Exhibit 1** are not identified on the Debtor's Official Form 204, which lists the estate creditors holding the twenty largest unsecured claims, Stinson believes the entities listed on **Exhibit 1** are indeed estate creditors.

7. Further, Stinson affirmatively states that the Stinson attorneys identified on **Exhibit 1** will not be involved in any matters pertaining to this bankruptcy case.

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

Dated: June 19, 2020

/e/ Robert T. Kugler
Robert T. Kugler

EXHIBIT 1

Creditor Name	Stinson Attorney Sitting on Board
University of St. Thomas	Attorney Aalok Sharma
College of Saint Benedict	Attorney Dan Scott