

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA**

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In re:

Chapter 11

THE DIOCESE OF ST. CLOUD, a Minnesota  
religious corporation,

Case No. 20-60337

Debtor.

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**APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS  
TO EMPLOY KRAMER LAW, LLC AS ABUSE CLAIM REVIEWER**

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TO: All parties of interest specified in Local Rule 2014-1(a).

1. The Official Committee of Unsecured Creditors (the “Committee”) moves the Court for the relief requested below.

2. The court has jurisdiction over this application pursuant to 28 USC §§ 157 and 1334, Fed. R. Bankr. P. 5005 and Local Rule 1070-1. This proceeding is a core proceeding pursuant to 28 U.S.C. § 157(b), and venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

3. This application arises under 11 U.S.C. §§ 327 and 1103 and Fed. R. Bankr. P. 2014. This motion is filed under Fed. R. Bankr. P. 9014 and Local Rules 2014-1. The Committee respectfully submits this application (“Application”) for entry of an order authorizing the Committee to retain and employ Kramer Law, LLC as the abuse claim reviewer to review all tort claims in this case to aid in the distribution of settlement funds to survivors as more fully described in the accompanying memorandum.

4. The Debtor filed its petition for relief on June 15, 2020 in the above-captioned bankruptcy case.

5. On June 16, 2020, the Office of the United States Trustee appointed the Committee.

6. On September 10, 2020, the Committee selected Kramer Law, LLC to serve as the abuse claim reviewer in this case, subject to this Court's approval. The Committee believes that Kramer Law possesses extensive knowledge and skill in the area of tort-claims analysis and neutral evaluation that is relevant to ascertaining the proper distribution of settlement funds to survivor-creditors. The Committee further believes Kramer Law to be well qualified to represent the Committee's interests. Accordingly, the Committee seeks an order authorizing the employment of Kramer Law on its behalf.

7. In related sexual-abuse based bankruptcies, the estates have appointed an abuse claims reviewer to determine the distribution of settlement funds to survivor-creditors. *See, e.g., In re The Archdiocese of Saint Paul and Minneapolis*, Case No. 15-30125, ECF 1262 (D. Minn. Sept. 19, 2018); *In re Crosier Fathers and Brothers of Onamia, et al.*, Case No. 17-41682, ECF 162 (D. Minn. Mar. 23, 2018); *In re The Diocese of New Ulm*, Case No. 17-30601, ECF 360 (D. Minn. March 6, 2020); *In re Diocese of Duluth*, Case No. 15-50792, ECF 413 (D. Minn. October 15, 2019).

8. The Debtor and Committee contemplate that pursuant to the plan of reorganization in this case, which has already been drafted and is being reviewed and finalized by the Committee and the Debtor as anticipated joint proponents, the Debtor will transfer assets to a trust to be distributed to survivor-creditors in a manner similar to past diocesan cases.

9. The Committee believes that Kramer Law should be employed now, prior to confirmation, because employing an abuse claim reviewer prior to confirmation will increase the

efficiency of estate and trust administration and will allow survivor-creditors to receive payment and closure more quickly.

10. Most of the abuse claim reviewer's work involves gathering information and reviewing claims. Such work can be done with equal efficiency and effectiveness before confirmation and before the anticipated establishment of a trust through a joint plan. The Committee places significant value on making trust distributions this year as opposed to next and believes an expedient distribution would represent a significant benefit to survivor-creditors. Retaining Kramer Law prior to confirmation materially increases the likelihood that distributions will be made to survivors in 2020.

11. By this Application, the Committee seeks to employ and retain Kramer Law as its abuse claim reviewer on the terms set forth in this Application. Kramer Law will be retained by the Committee, but will not be paid until after the effective date of the plan. Through the plan, Kramer Law will become a professional retained by the trustee and will then be paid upon completion of the initial abuse claim review process.

12. The Committee conferred with the Debtor prior to filing this Application and the Debtor reviewed this Application before it was filed. The Committee has the Debtor's authority to represent that the Debtor supports Kramer Law's retention prior to confirmation.

13. The professional services that Kramer Law will render to the Committee in its capacity as abuse claim reviewer will include, but not be limited to gathering and analyzing information to assist the future creditor trustee in determining the appropriate amount of trust assets to distribute to each eligible survivor-creditor.

14. The Committee is familiar with the professional standing and reputation of Kramer Law, and recognizes that Kramer Law has experience providing services as a abuse

claim reviewer in similar bankruptcy proceedings, such as in *In re the Archdiocese of St. Paul and Minneapolis*, *In re the Diocese of Duluth*, *In re the Diocese of New Ulm*, and *In re Crosier Fathers of Onamia, et al.*.

15. Also, among other things, Kramer Law has extensive experience in litigating and mediating sexual abuse claims. As the declaration of Roger Kramer shows, Roger Kramer is a member of the National Academy of Distinguished Neutrals and regularly practices as a neutral evaluator, mediator, and arbitrator.

16. The Committee believes Kramer Law's experience and credentials establish its qualifications to serve as the abuse claim reviewer in this case.

17. Subject to Court approval in accordance with section 330(a) of the Bankruptcy Code, compensation will be payable to Kramer Law pursuant to the following terms:

a. Roger Kramer will charge \$450.00 per hour for his work.

18. Kramer Law shall also be entitled to reimbursement of its actual, necessary expenses and any other related and reasonable charges incurred. Such expenses may include, among other things, mail and courier charges, photocopying charges, and other expenses. Kramer Law will bill for these expenses in a manner and at rates consistent with those charged in other cases and in a manner consistent with the rules and requirements of this Court or any applicable trust agreement.

19. Kramer Law, insofar as the Committee has been able to ascertain, does not represent any interest adverse to the Debtor, its estate, its creditors, or the Committee in the matters upon which Kramer Law is to be engaged.

20. To the best of the Committee's knowledge, Kramer Law has no prior connection with the Debtor, its creditors, or any other party-in-interest or their respective attorneys in the

matters upon which it is to be engaged that would in any way disqualify it from serving as abuse claim reviewer.

21. Kramer Law has indicated a willingness to act as abuse claim reviewer on the Committee's behalf, in accordance with the terms of this Application.

22. Notice of this Application has been given to (i) the U.S. Trustee, (ii) counsel to the Debtor, and (iii) those parties requesting notice pursuant to Bankruptcy Rule 2002. The Committee submits that, in light of the nature of the relief requested, no other or further notice need be given.

23. The Committee has not made a similar application in this Court or in any other court.

Wherefore, the Committee respectfully requests entry of an order in the form attached authorizing the Committee to retain Kramer Law, LLC, as a abuse claim reviewer for the Committee, effective as of September 10, 2020, and granting such further relief as may be just and proper.

OFFICIAL COMMITTEE OF UNSECURED CREDITORS

Date: September 14, 2020 By: 

Its: Chairman

PREPARED BY:

Robert T. Kugler (#0194116)  
Edwin H. Caldie (#0388930)  
**STINSON LLP**  
50 South Sixth Street, Suite 2600  
Minneapolis, MN 55402

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**COUNSEL FOR THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS**

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA**

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In re:

Chapter 11

THE DIOCESE OF ST. CLOUD, a Minnesota  
religious corporation,

Case No. 20-60337

Debtor.

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**DECLARATION OF ROGER KRAMER IN SUPPORT OF APPLICATION TO  
EMPLOY KRAMER LAW, LLC AS ABUSE CLAIM REVIEWER**

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State of Minnesota )

County of Dakota )

I, Roger Kramer, make this declaration pursuant to Rules 2014(a) and 2016(b) of the Federal Rules of Bankruptcy Procedure, and declare as follows:

1. I am the principal of Kramer Law, LLC.

2. I have practiced law for over thirty years as a civil litigator, mediator, neutral evaluator, and arbitrator. I am a certified civil trial specialist and a member of the National Academy of Distinguished Neutrals. I have completed advanced mediation training from Straus Institute for Dispute Resolution at Pepperdine University School of Law.

3. I make this affidavit in support of Kramer Law, LLC's employment as abuse claim reviewer for the Official Committee of Unsecured Creditors (the "Committee") in the above-captioned bankruptcy case (the "Bankruptcy Case").

4. I have personal knowledge of the facts stated in this affidavit. If called as a witness, I could and would testify competently to these facts, except where matters are stated on information and belief. As to those facts, I am informed and believe that they are true.

5. I submit this declaration in support of the *Application to Employ Kramer Law, LLC as Abuse claim reviewer* (the “Application”).

6. In my years of practice, I have mediated over 1,500 cases involving personal injury claims, including claims involving sexual abuse.

7. Most recently, I have served as an abuse claim reviewer for the trusts established in *In re The Archdiocese of St. Paul and Minneapolis*, *In re The Diocese of Duluth*, *In re The Diocese of New Ulm*, and *In re Crosier Fathers of Onamia, et al.*

8. In the Bankruptcy Case, Kramer Law, LLC can provide the Committee with particular expertise in evaluating and administering the claims filed by survivor-creditors.

9. The Committee has asked Kramer Law, LLC to, among other things, gather and analyze information to assist a future creditor trustee in determining the appropriate amount of trust assets to distribute to each eligible survivor-creditor.

10. Kramer Law, LLC has agreed with the Committee as follows with regard to its retention, subject to court approval:

a. I will charge \$450.00 per hour for my work.

11. I understand that all of Kramer Law, LLC’s fees and expenses will be paid by a creditor trust after the confirmation of a plan of reorganization in this case and I agree to this arrangement on behalf of Kramer Law, LLC.

12. Kramer Law, LLC has not received any retainer from any person, or any payment, or any promise of payment in relation to this case, during the one-year period prior to the filing of the Debtor’s petition. No post-petition compensation has been paid or promised to be paid from a source other than the estate in this Bankruptcy Case or the future trust established in this Bankruptcy Case.



13. Neither the Committee nor its members (or any of their representatives) are or will be liable for fees or costs that Kramer Law, LLC incurs in its representation of the Committee.

14. I have received a list of the Debtor's creditors and other persons identified as potential parties in interest in the Bankruptcy Case (the "PII List"), which is reflected on Exhibit A of this Declaration. At my direction, employees of Kramer Law, LLC processed through its computerized conflict-check system the PII List, Debtor's name as well as the names of the members of the Committee and each of the Debtor's property and casualty insurers that have been identified. A summary of relationships with parties on the PII List that Kramer Law, LLC identified during this process is set forth on Exhibit B to this Declaration.

15. I have reviewed the list of entities set forth on Exhibit B. Based on that review, I have concluded that Kramer Law, LLC does not have business relationships with any of the entities listed on the conflicts search list that would present conflicts related to the Bankruptcy Case.

16. Based on the process referred to above, to the best of knowledge, information, and belief, I am informed and believe as follows:

- a. Kramer Law, LLC has not previously provided work to the Debtor;
- b. To the best of my knowledge, Kramer Law, LLC has not provided services to any creditor of the Debtor that would cause it to have an adverse interest in the Bankruptcy Case;
- c. Kramer Law, LLC is not a creditor of the Debtor;

- d. Neither Kramer Law, LLC nor members of the firm are creditors, equity security holders, or insiders of the Debtor;
- e. Kramer Law, LLC is not, nor ever was, an investment banker for any outstanding security of the Debtor;
- f. Kramer Law, LLC has not, within two years before the Petition Date, been a director, officer or employee of the Debtor;
- g. Kramer Law, LLC does not have an interest materially adverse to the interest of the Debtor or any class of creditors or equity security holders by reason of any direct or indirect relationship with, connection with, or interest in, the Debtor, or for any other reason;
- h. Kramer Law, LLC was not owed any sums by the Debtor for services rendered or costs advanced on behalf of the Debtor prior to the Petition Date.

17. Because of the nature of Kramer Law, LLC's business, it is possible that it has personally provided and may in the future provide services to other creditors or parties in interest in the Debtor's bankruptcy case, which services are wholly unrelated to any matter involving this Bankruptcy Case. If I receive a list of additional parties in interest in the Debtor's Bankruptcy Case, Kramer Law, LLC will perform a further conflicts analysis and disclose any relevant information in writing to the Court to the Office of the United States Trustee.

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

Dated this 14th day of September, 2020.



UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

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In re:

Chapter 11

THE DIOCESE OF ST. CLOUD, a  
Minnesota religious corporation,

Case No. 20-60337

Debtor.

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ORDER AUTHORIZING EMPLOYMENT OF  
KRAMER LAW, LLC AS ABUSE CLAIM REVIEWER

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This case is before the Court on the application of the Official Committee of Unsecured Creditors' to employ Kramer Law, LLC as abuse claim reviewer.

Based on the motion and file,

IT IS ORDERED: The Application is granted.

Dated:

\_\_\_\_\_  
Honorable Robert K. Kressel  
United States Bankruptcy Judge

# **Exhibit A**

<b>BUSINESS/LAST NAME</b>
4VOICE
ABBEY GUESTHOUSE
ACUMEN PSYCHOLOGY
AFC FOODS
ALL SAINTS
ALL SAINTS ACADEMY, ST. CLOUD CAMPUS
ALLSTREAM
AMERICAN SOLUTIONS FOR BUSINESS
ANNUNCIATION
APOSTOLIC NUNCIATURE
APPLE INC.
ARCHDIOCESE OFFICE OF VOCATIONS
ARVIG
ASSUMPTION
ASSUMPTION NURSING HOME
ASSUMPTION OF OUR LADY
ASSUMPTION OF THE BLESSED VIRGIN MARY
ASSUMPTION-CALVARY CEMETERIES
AUTO OWNERS INSURANCE
AVE MARIA
AVE MARIA PRESS
BENTON COMMUNICATIONS
BETTY'S EMBROIDERY
BLACKBAUD
BLANK ROME LLP
BOMA - USA
BRADSHAW & BRYANT, PLLC
BREMER BANK
BUCA SALES & MARKETING, LLC
CAMP CASTAWAY
CAMP ONOMIA
CATHEDRAL HIGH SCHOOL
CATHOLIC ASSOCIATION OF DIOCESAN ECUMENICAL AND INTERRELIGIOUS OFFICERS
CATHOLIC CHARITIES
CATHOLIC COMMUNITY SCHOOLS
CATHOLIC FOUNDATION OF THE DIOCESE OF ST. CLOUD
CATHOLIC MUTUAL GROUP
CATHOLIC NEWS SERVICE
CATHOLIC PRESS ASSOC.
CATHOLIC RURAL LIFE
CATHOLIC UMBRELLA POOL II
CCB TECHNOLOGY
CENTER FOR CHRIST

CENTER FOR MINISTRY DEVELOPMENT
CENTRACARE HEALTH
CENTRACARE HEALTH
CENTRAL MINNESOTA RESIDENTS ENCOUNTER CHRIST
CENTURYLINK
CHARLES SCHWAB
CHARTER AUDIT
CHRIST CHURCH NEWMAN CENTER
CHRIST OUR LIGHT NORTH
CHRIST OUR LIGHT SOUTH
CHRIST THE KING
CHRIST THE KING
CHRIST THE KING SCHOOL
CHRISTIAN BROS. EMPLOYEE RETIREMENT PLAN
CHRISTIAN BROTHERS 403B PLAN
CITY OF ST. CLOUD
CLERICAL AID ASSOCIATION
CLIFTONLARSONALLEN LLP
CLOUDNET
COBORN'S CATERING
COLLEGE OF ST. BENEDICT
CONFERENCE FOR PASTORAL PLANNING AND COUNCIL DEVELOPMENT
CONVERCENT, INC.
COORDINATED BUSINESS SYSTEMS
CORNERSTONE BUFFET & RESTAURANT
CREATIVE CATERING
CROSIER FATHERS AND BROTHERS PROVINCE, INC.
CROTEAU PLUMBING & HEATING, LLC
D.E.S. OF ST. CLOUD, INC.
DECLAN WEIR PRODUCTIONS
DIGITAL PRINTING PLUS
DIOCESAN FISCAL MANAGEMENT CONFERENCE NATIONAL OFFICE
DIOCESE OF SHREVEPORT
DIOCESE OF SIOUX FALLS
DIOCESE OF ST. CLOUD DEPOSIT AND LOAN FUND, a Minnesota nonprofit corporation
DIOCESE OF WINONA-ROCHESTER
DISTRICT 742 COMMUNITY SCHOOLS
INTERNAL REVENUE SERVICE
DRIVER AND VEHICLE SERVICES
DRURY HOTELS
EAST SIDE GLASS

ELECTRIC MOTOR SERVICE
EXCITED HIPPO
FAFINSKI MARK & JOHNSON, P.A.
FAITH CATHOLIC
FALLS BALLROOM
FARICY LAW FIRM P.A.
FR. PIERZ SCHOOL OF RELIGION
FRANCISCAN SISTERS OF LITTLE FALLS
FULLY ENGAGED, LLC
GABRIEL MEDIA, INC.
GALLAGHER BENEFIT SERVICES INC.
GOODIN COMPANY
GRANITE CITY REAL ESTATE
GREAT AMERICA
GUARDIAN ANGELS HOMES, INC.
H&S HEATING AND AIR
HANDYMAN'S INC.
HEALTHEC, LLC
HIS HOLINESS POPE FRANCIS
HJ BOERBOOM & PETROLLE'S
HOAG & SONS BOOK BINDERY
HOGAN MEDIATION
HOLY CROSS
HOLY CROSS SCHOOL
HOLY FAMILY
HOLY FAMILY SCHOOL
HOLY SPIRIT
HOLY TRINITY
HOLY TRINITY SCHOOL
IMMACULATE CONCEPTION
IMMACULATE HEART OF MARY SEMINARY
INCONTACT, INC.
INCREDIPLEX
INDUS MIS, INC.
INNOVATIVE OFFICE SOLUTIONS LLC
INSTITUTE FOR PASTORAL INITIATIVES
INSTITUTE FOR PRIESTLY FORMATION
INSTITUTE OF SCHOOL AND PARISH DEVELOPMENT
INTERNAL REVENUE SERVICE
J. P. COOKE CO.
JAMS INC.
JANSON LAW OFFICE
JEFF ANDERSON & ASSOCIATES
JOHNSON CONTROLS
KEY ROW HOUSING
KSTC TV

LEIGHTON BROADCASTING
LEIGHTON BROADCASTING - KPRW
LITURGICAL PRESS
LITURGY TRAINING PUBLICATIONS
LOYOLA PRESS
MAILFINANCE INC.
MARY OF LOURDES ELEMENTARY SCHOOL
MARY OF LOURDES MIDDLE SCHOOL
MARY OF THE IMMACULATE CONCEPTION
MARY OF THE VISITATION
MARY RONDORF HOME
MEDTRONIC CORPORATION
MEIER, KENNEDY & QUINN
MIDWEST MACHINERY CO.
MIKE PATIN LLC
MINNESOTA CATHOLIC CONFERENCE
MINNESOTA DEPARTMENT OF REVENUE
MINNESOTA SECRETARY OF STATE
MISSION OFFICE FOR THE DIOCESE OF ST. CLOUD
NATIONAL ASSOCIATION OF CATHOLIC FAMILY LIFE MINISTERS
NATIONAL CATHOLIC EDUCATIONAL ASSOCIATION
NATIONAL COMMITTEE FOR A HUMAN LIFE AMENDMENT, INC.
NATIONAL CONFERENCE OF DIOCESAN VOCATION DIRECTORS
NATIONAL FEDERATION FOR CATHOLIC YOUTH MINISTRY
NEOPOST USA INC.
NEWMAN CATHOLIC CENTER
NEXVORTEX, INC.
NRP DIRECT
OFFICE DEPOT
OFFICE OF LATINO MINISTRY
OFFICE OF THE ATTORNEY GENERAL
OFFICE OF THE U.S. ATTORNEY
OFFICE OF THE U.S. TRUSTEE
OGLETREE DEAKINS
ONE MORE SOUL
OPTUM BANK
ORDER OF ST. BENEDICT
OREGON CATHOLIC PRESS
OTIS ELEVATOR COMPANY
OUR LADY OF LOURDES
OUR LADY OF MOUNT CARMEL



OUR LADY OF SEVEN DOLORS
OUR LADY OF THE ANGELS
OUR LADY OF THE LAKE
OUR LADY OF THE RUNESTONE
OUR LADY OF VICTORY
OUR LADY OF VICTORY SCHOOL
OUR SUNDAY VISITOR
PEETERS PUBLISHERS
PIPER SANDLER
POSTMASTER
PRIEST PENSION
PSYCNSEW CREATIONS
QUADIENT FINANCE USA, INC.
QUADIENT LEASING USA
QWIKHOST
R & D SALES INC.
REGION VIII YOUTH MINISTRY
RENGEL PRINTING COMPANY
RESOURCE TRAINING AND SOLUTION
ROMAN CATHOLIC ARCHBISHOP OF WASHINGTON
SACRED HEART
SACRED HEART SCHOOL
SAINT JOHN'S PREPARATORY SCHOOL
SAINT JOSEPH CATHOLIC SCHOOL
SCHIFF HARDIN LLP Everett
SELECTION.COM
SEVEN DOLORS
SHORTSTOP CATERING
SISTERS OF ST. BENEDICT
SPECIAL COLLECTIONS
SPECTRUM
SPELTZ HOUSE
SPIRIT AND SAINTS YOUTH MINISTRY
SS. PETER & PAUL
SS. PETER & PAUL SCHOOL
ST PATRICK'S GUILD
ST. AGNES
ST. AGNES SCHOOL
ST. ALEXIUS
ST. ANDREW
ST. ANDREW SCHOOL
ST. ANN
ST. ANTHONY
ST. ANTHONY OF PADUA
ST. AUGUSTINE

ST. BARTHOLOMEW
ST. BENEDICT
ST. BENEDICT'S MONASTERY
ST. BONIFACE
ST. BONIFACE SCHOOL
ST. CHARLES
ST. CLOUD AREA CHAMBER OF COMMERCE
ST. CLOUD BOOK SHOP
ST. CLOUD CHILDREN'S HOME
ST. CLOUD FLORAL INC.
ST. CLOUD STAMP & SIGN INC.
ST. CLOUD TIMES
ST. COLUMBKILLE
ST. DONATUS
ST. EDWARD
ST. ELIZABETH
ST. ELIZABETH ANN SETON
ST. ELIZABETH ANN SETON SCHOOL
ST. ELIZABETH OF HUNGARY
ST. FRANCIS DE SALES
ST. FRANCIS OF ASSISI
ST. FRANCIS XAVIER
ST. FRANCIS XAVIER SCHOOL
ST. FREDERICK
ST. GALL
ST. HENRY
ST. HENRY'S AREA SCHOOL
ST. HUBERT
ST. JAMES
ST. JOHN
ST. JOHN - ST. ANDREW SCHOOL
ST. JOHN CANTIUS
ST. JOHN NEPOMUK
ST. JOHN NEPOMUK
ST. JOHN THE BAPTIST
ST. JOHN THE BAPTIST
ST. JOHN THE BAPTIST
ST. JOHN THE BAPTIST
ST. JOHNS ABBEY
ST. JOHN'S AREA SCHOOL
ST. JOHNS DINING SERVICE
ST. JOHNS PREPARATORY SCHOOL
ST. JOHNS SCHOOL OF THEOLOGY
ST. JOHNS UNIVERSITY
ST. JOHN'S UNIVERSITY BOOKSTORE
ST. JOSEPH
ST. KATHARINE DREXEL SCHOOL

ST. KATHRYN
ST. LAWRENCE
ST. LAWRENCE
ST. LEONARD OF PORT MAURITIUS
ST. LOUIS
ST. LOUIS BERTRAND
ST. MARCUS
ST. MARGARET
ST. MARTIN
ST. MARY
ST. MARY HELP OF CHRISTIANS
ST. MARY HELP OF CHRISTIANS SCHOOL
ST. MARY OF MOUNT CARMEL
ST. MARY OF MOUNT CARMEL SCHOOL
ST. MARY OF THE PRESENTATION
ST. MARY SCHOOL
ST. MARY VILLA
ST. MARY'S CATHEDRAL
ST. MARY'S PRESS
ST. MARY'S UNIVERSITY
ST. MICHAEL
ST. NICHOLAS
ST. OLAF
ST. PATRICK
ST. PAUL
ST. PETER
ST. RITA
ST. ROSE OF LIMA
ST. STANISLAUS
ST. STANISLAUS KOSTKA
ST. STEPHEN
ST. THERESE LITTLE FLOWER MISSION
ST. THOMAS
ST. WENDELIN
ST. WENDELIN SCHOOL
ST. WILLIAM
ST. WILLIAMS LIVING CENTER
STAPLES BUSINESS CREDIT
STAR TRIBUNE
STEARNS COUNTY AUDITOR-TREASURER
STEVE'S EXCAVATING INC.
STRINGLINE MOTION PICTURE COMP.
SUMMIT COMPANIES
THE CATHOLIC AID ASSOCIATION
THE HOLY ROOD GUILD
THE LANGUAGE BANC

THE SOCIETY FOR PROPAGATION OF THE FAITH, INC.
THIRD ORDER REGULAR OF SAINT FRANCIS
TOTALFUNDS / HASLER
TRI-PARISH YOUTH
TROBEC'S BUS SERVICE
U.S. BANK, N.A.
U.S. POSTAL SERVICE
U.S. POSTAL SERVICE
ULINE
UNITED BANKERS BANK
UNITED STATES CONFERENCE OF CATHOLIC BISHOPS
UNITED STATES TREASURY
UNITED WAY OF THE ST. CLOUD AREA
UNIVERSITY OF ST. THOMAS
VANCO PAYMENT SOLUTIONS
VERIZON WIRELESS
VIANNEY VOCATIONS
VITA PSYCHOLOGICAL SERVICES, LLC
VOIGT'S MOTORCOACH TRAVEL INC.
WAITE PARK BMEU
WASTE MANAGEMENT-ST. CLOUD
WELLS FARGO BUSINESS CREDIT
WESTVIEW DENTISTRY, PLLC
WINKELMAN BUILDING CORP.
WORSHIP
XCEL ENERGY
YOUR TRAVEL AGENCY

## **Exhibit B**

**Exhibit B**

<b>Entity</b>	<b>Relationship</b>
Auto Owners Insurance	Mediator
Bradshaw & Bryant, PLLC	Mediator
Bremer Bank	Mediator
Catholic Mutual Group	Mediator
CenturyLink	Mediator
Clifton Larson Allen LLP	Mediator
Crosier Fathers and Brothers Province, Inc.	Mediator
Fafinski Mark & Johnson, P.A.	Mediator
Faricy Law Firm P.A.	Mediator
Jams Inc.	Mediator
Janson Law Office	Mediator
Jeff Anderson & Associates	Mediator
Medtronic Corporation	Mediator
Meier, Kennedy & Quinn	Mediator
Office of the Attorney General	Mediator
Office of the U.S. Attorney	Mediator
Ogletree Deakins	Mediator
Optum Bank	Mediator
St. John	Mediator
St. John's Abbey	Mediator
St. John's University	Mediator
St. Rose of Lima	Mediator
U.S. Bank, N.A.	Mediator
Verizon Wireless	Mediator
Xcel Energy	Mediator