IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

IN RE:	§	
	§	**CASE NO. 26-30311-CGB**
CATHOLIC DIOCESE OF EL PASO,	§	
	§	**CHAPTER 11**
DEBTOR[1]	§	

DIOCESE'S *EMERGENCY* MOTION FOR AN ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND REIMBURSEMENT OF EXPENSES FOR PROFESSIONALS

TO THE HONORABLE CHRISTOPHER G. BRADLEY,
UNITED STATES BANKRUPTCY JUDGE:

The Catholic Diocese of El Paso (the "**Diocese**"), as debtor-in-possession, by and through undersigned counsel files *Diocese's Emergency Motion for an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (the "**Interim Comp Motion**" or "**Motion**") pursuant to sections 105(a), 331, 363(c), 1107(a), and 1108 of Title 11 of the United States Code (the "**Bankruptcy Code**") establishing procedures for the payment of monthly interim compensation and reimbursement of expenses to professionals. The Diocese seeks entry of an order substantially in the form attached as Exhibit A (the "**Order**"). In support of this Motion, the Diocese relies on the *Declaration of Bishop Mark J. Seitz Regarding the Diocese's History, Charitable Mission, and Purpose in Seeking Chapter 11 Relief* (the "**Seitz Declaration**") and the *Declaration of Gregory J. Watters in Support of First Day Motions* (the "**Watters Declaration**," together with the Seitz Declaration, the "**First Day Declarations**"), which are incorporated by reference, and shows as follows:

[1] The Diocese's address is 499 St. Matthews Street, El Paso, TX 79907. The last four digits of the Diocese's federal tax identification number are 0751.

Jurisdiction and Venue

1. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334.

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The bases for the relief requested herein are sections 105(a), 331, 363(c), 1107(a), and 1108 of the Bankruptcy Code.

Background

4. On March 6, 2026 (the "**Petition Date**"), the Diocese filed its voluntary petition for relief under Chapter 11 of the Bankruptcy Code. The Diocese continues to operate its business and manage its property as debtor-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed, and no committees have been appointed or designated in this Chapter 11 case.

5. With the filing of the petition, the Diocese filed the First Day Declarations. Please refer to the First Day Declarations for a summary of the Diocese in the above-referenced Chapter 11 case, including an overview of the Diocese's history, mission, ministries, financial position, the circumstances giving rise to the commencement of the Chapter 11 case, and an overview of the relief requested in the first day pleadings.

Relief Requested

6. The Diocese requests that this Court enter an order establishing certain interim compensation and expense reimbursement procedures for the professionals retained by the Diocese and any official committee and its members, if appointed (collectively, "**Professionals**").

7. The Diocese has filed an application to retain Husch Blackwell LLP ("**Husch Blackwell**") as bankruptcy counsel, Levatino|Pace PLLC ("**Levatino**"), as special outside general counsel, and HMP Advisory Holdings, LLC dba Harney Partners ("**HP**") as financial

advisor. The Diocese may later seek to engage other professionals in connection with these proceedings.

8. The Diocese requests that procedures for compensating and reimbursing Court-approved Professionals on a monthly basis be established herein. Such an order will permit the Court and all parties to more effectively monitor the professional fees incurred in this Chapter 11 case and will prevent the Professionals from experiencing cash flow difficulties resulting from the usual delays in payment of Chapter 11 counsel fees given the scope of work this case will require.

9. The requested procedures would require Professionals seeking interim compensation from the estate to serve detailed invoices reflecting the services rendered and expenses incurred by each Professional for the prior month, which invoices would be served upon: **(a) the Diocese, through its counsel of record and through its designated representative; (b) the Office of the United States Trustee; and (c) any official committee, once such committee is appointed, through its counsel of record** (collectively, the "**Service Parties**"). If there is no timely objection, the Professionals would be permitted to be paid eighty percent (80%) of the amount of fees incurred for the month, and one hundred percent (100%) of disbursements for the month. These payments would be subject to the Court's subsequent approval as part of the normal interim fee application process approximately every one hundred and twenty (120) days, at which time the Professionals may seek payment of the remaining twenty percent (20%) of the fee (the "**Holdback**").

9. Specifically, the Diocese proposes that the monthly payment of compensation and reimbursement of expenses of the Professionals be structured as follows (the "**Interim Compensation Procedures**"):

a. on or before the fifteenth (15th) day of each month following the month for which compensation is sought, the Professionals may submit an invoice or invoices (each a "**Fee Summary**") to the Service Parties. Each entity receiving a Fee Summary will have ten (10) days from the date of mailing thereof to review the Fee Summary. At the expiration of the ten (10) day period, if no objection (as described below) is made to the Fee Summary, each Professional who submitted a Fee Summary will notify the Diocese, in writing, that no objections have been filed with regard to the Fee Summary. Upon receipt of such notice, the Diocese will pay eighty percent (80%) of the fees and one hundred percent (100%) of the reimbursements of expenses requested in the Professionals' respective Fee Summaries, which payment may be made directly by the Diocese. Any Professional who fails to file a Fee Summary for a particular month or months may submit a consolidated Fee Summary that includes a request for compensation earned or expenses incurred during previous months. All Fee Summaries shall include the relevant time entry and description and expense detail;

b. in the event any of the Service Parties has an objection to the compensation or reimbursement sought in a particular Fee Summary, it will, within ten (10) days of the receipt of the Fee Summary, serve upon (i) the Professional whose Fee Summary is objected to, and (ii) except to the extent duplicative of the foregoing clause (i), the other Service Parties, a written "*Notice of Objection to Fee Summary*," setting forth the precise nature of the objection and the amount at issue. Thereafter, the objecting Service Party or Service Parties and the Professional whose Fee Summary is objected to will attempt to reach an agreement regarding the correct payment to be made. If the parties are unable to reach an agreement on the objection(s) within fifteen (15) days after receipt of such Notice of Objection to Fee Summary, the Professional whose Fee Summary is objected to will have the option of (i) filing the objection(s) together with a request for payment of the disputed amount with the court, or (ii) foregoing payment of the disputed amount until the next interim fee application hearing, at which time the Court will consider and dispose of the objection(s) if payment of the disputed amount is requested. The Diocese is authorized and directed to pay promptly the balance of the undisputed fees, up to eighty percent (80%), and one hundred percent (100%) of the disbursements requested that are not the subject of a Notice of Objection to Fee Summary;

c. commencing with the period beginning on the Petition Date and ending June 30, 2026, and for each four (4) month interval thereafter (each, an "**Interim Fee Period**"), on or before the forty-fifth (45th) day following the last day of the Interim Fee Period each of the Professionals may file with the Court and serve on the Core Service List[2] an application for interim court approval and allowance, pursuant to section 331 of the Bankruptcy Code, of the compensation

[2] "**Core Service List**" means the service list created by the Diocese comprised of the core parties-in-interest in the Chapter 11 case who would be entitled to receive service of all filings, including (i) the Office of the United States Trustee for Region 7; (ii) the Diocese; (iii) the attorneys for the Diocese; (iv) the attorneys for the Committee once that committee has been appointed, and until then (a) the Plaintiffs in abuse lawsuits against the Diocese through their counsel and (b) the Diocese's twenty (20) largest unsecured trade creditors; (v) those persons who have formally appeared by filing a Notice of Appearance, a Request for Notice, or a similar document and requested notice in this case under Bankruptcy Rule 2002; (vi) the Texas Attorney General's Office; and (vii) known counsel to the foregoing.

and reimbursement of expenses requested for the Interim Fee Period (the "**Interim Fee Application**") that incorporates the unfiled monthly Fee Summaries. Any Professional who fails to file an Interim Fee Application when due shall be ineligible to receive further interim payments of fees or expenses as provided herein until such time as the application is submitted. Upon approval of the Interim Fee Application, any Professional will be paid withheld amounts of approved fees and expenses for the applicable period. For the avoidance of doubt, each Professional shall file its first Interim Fee Application on or before August 14, 2026, and the first Interim Fee Application shall cover the Interim Fee Period from the Petition Date (or the effective date of the Professional's retention) through and including June 30, 2026;

d. the pendency of an application or a Court order that payment of compensation or reimbursement of expenses was improper as to a particular Fee Summary or Interim Fee Application will not disqualify a Professional from the future payment of compensation or reimbursement of expenses as set forth above; and

e. neither (i) the payment of or failure to pay, in whole or in part, a Fee Summary or Interim Fee Application; nor (ii) the filing of or failure to file an Objection will bind any party in interest or the Court with respect to the final allowance of applications for compensation and reimbursement of expenses of Professionals.

11. The procedures suggested in this Motion will enable the parties to closely monitor the costs of administration of the case and allow the Diocese to maintain a more level cash flow availability and implement efficient cash management procedures to address the costs of administration of the Estate.

12. The Diocese further requests that the Court limit the notice of hearings to consider Interim Fee Applications to the Core Service List. Such notice should reach the parties most active in this Chapter 11 Case and will save the expense of undue duplication and mailing.

13. The Diocese requests authority to pay the Professional Fees from any of the Diocese's resources, but in adherence to any cash collateral order entered by the Court in this case.

<u>Basis for Relief</u>

14. Section 331 of the Bankruptcy Code provides, in pertinent part, as follows:

> A trustee, an examiner, a debtor's attorney, or any professional person employed under section 327 or 1103 of this title may apply to the Court not more than once every 120 days after an order for relief in a case under this title, *or more often if the*

> *Court permits*, for such compensation for services rendered before the date of such an application or reimbursement for expenses incurred before such date as is provided under section 330 of this title. (Emphasis added.)

15. Section 105(a) of the Bankruptcy Code provides, in pertinent part, that a "court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title."

16. Similar procedures for compensating and reimbursing court-approved professionals have been established in other Chapter 11 cases in this court, including *In re RIC (Austin) LLC*, No. 24-10264 (Bankr. W.D. Tx. November 13, 2024) [Dkt. No. 83]; *In re Proppant Tech Services LLV*, 5:23-BK-50734 (Bankr. W.D. Tx. July 13, 2023) [Dkt. No. 81]; and *In Camp Energy LTD*, No. 22-50058 (Bankr. W.D. Tx. March 1, 2022) [Dkt. No. 47].

17. Such procedures are needed to avoid having professionals fund the reorganization case. *In re Int'l Horizons, Inc.*, 10 B.R. 895, 897 (Bankr. N.D. Ga. 1981) (court established procedures for monthly interim compensation). Appropriate factors to consider include "the size of reorganization cases, the complexity of the issues involved, and the time required on the part of the attorneys for the debtor in providing services necessary to achieve a successful reorganization of the debtor." *Id.* at 897-98. The Diocese submits that the procedures sought herein are appropriate considering the above factors. *See also In re Frontier Airlines, Inc.*, 74 B.R. 973 (Bankr. D. Colo. 1987), and *In re Kaiser Steel Corporation*, 74 B.R. 855 (Bankr. D. Colo. 1987).

18. The Diocese further maintains that the efficient administration of this Chapter 11 case will be significantly aided by establishing the foregoing interim compensation and expense reimbursement procedures. Accordingly, the relief requested is in the best interests of the Diocese, its estate, and creditors.

Notice

19. The Diocese will provide notice of this Motion to: (i) the Office of the United States for Trustee for Region 7; (ii) the attorneys for the Committee once the committee has been appointed, and until then, (a) the Plaintiffs in abuse lawsuits against the Diocese through their counsel and (b) the Diocese's twenty (20) largest unsecured trade creditors; (iii) those persons who have formally appeared by filing a Notice of Appearance, a Request for Notice, or a similar document and requested notice in this case under Bankruptcy Rule 2002; (iv) the Texas Attorney General's Office; (v) the secured creditor, WestStar Bank through its counsel; (vi) the ad hoc group of abuse survivors through its counsel, Drew J. Glasnovich; and (vii) to the extent applicable, known counsel to the foregoing. A copy of this Motion and any orders approving it will also be made available on the Diocese's Case Information Website located at https://cases.stretto.com/dioceseofelpaso. The Diocese submits that, in light of the nature of the relief requested, no other or further notice need be given.

No Prior Request

20. No prior motion for the relief requested has been made to this or any other court.

WHEREFORE, the Diocese respectfully requests that the Court enter an Order substantially in the form attached as Exhibit A granting the relief requested herein and grant such other relief as the Court deems appropriate under the circumstances.

Dated: March 6, 2026

Respectfully submitted,

HUSCH BLACKWELL LLP

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ATTORNEYS FOR THE DEBTOR AND DEBTOR IN POSSESSION, CATHOLIC DIOCESE OF EL PASO

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 6, 2026, a true and correct copy of the forgoing document, together with all exhibits and attachments hereto, was filed with the Court and served to the parties on the attached service via the method indicated.

/s/ Lynn Hamilton Butler
Lynn Hamilton Butler

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Ad Hoc Committee
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U.S. Trustee
Aubrey Thomas
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Texas Attorney General
Texas Office of the Attorney General
Bankruptcy & Collections Division
P.O. Box 12548
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Top 20 Unsecured Creditors

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EXHIBIT A

PROPOSED ORDER

IN THE UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

IN RE:	§	
	§	**CASE NO. 26-30311-CGB**
CATHOLIC DIOCESE OF EL PASO,	§	
	§	**CHAPTER 11**
DEBTOR[1]	§	

ORDER ESTABLISHING
PROCEDURES FOR INTERIM COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR PROFESSIONALS

Considering the *Diocese's Emergency Motion for an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* (Doc. 8), the "**Interim Comp Motion**" or "**Motion**"),[2] filed by the Diocese of El Paso (the "**Diocese**"); the Court having

[1] The Diocese's address is 499 St. Matthews Street, El Paso, TX 79907. The last four digits of the Diocese's federal tax identification number are 0751.
[2] Capitalized terms used in this Order shall have the meanings ascribed to them in the Motion.

reviewed the Motion and having considered the statements of counsel and the evidence adduced at the hearing held on March [•] (the "**Hearing**"); and the Court having found that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; this is a core proceeding pursuant to 28 U.S.C. § 157(b); venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and notice of the Motion and the Hearing was sufficient under the circumstances; and the Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the relief granted herein;

IT IS HEREBY ORDERED that:

1. The Interim Comp Motion is **GRANTED** as set forth herein.

2. Each professional whose retention has been approved by the Court under 11 U.S.C. §§ 327 or 1103 in the Chapter 11 case (each a "**Professional**," and collectively, the "**Professionals**") shall be entitled to seek and obtain payment of interim compensation and/or reimbursement of expenses, as the case may be, in accordance with the following procedures (the "**Interim Compensation Procedures**"):

a. on or before the fifteenth (15th) day of each month following the month for which compensation is sought, the Professionals may submit an invoice or invoices (each a "**Fee Summary**") to the Service Parties. Each entity receiving a Fee Summary will have ten (10) days from the date of mailing thereof to review the Fee Summary. At the expiration of the ten (10) day period, if no objection (as described below) is made to the Fee Summary, each Professional who submitted a Fee Summary will notify the Diocese, in writing, that no objections have been filed with regard to the Fee Summary. Upon receipt of such notice, the Diocese will pay eighty percent (80%) of the fees and one hundred percent (100%) of the reimbursements of expenses requested in the Professionals' respective Fee Summaries, which payment may be made directly by the Diocese. Any Professional who fails to file a Fee Summary for a particular month or months may submit a consolidated Fee Summary that includes a request for compensation earned or expenses incurred during previous months. All Fee Summaries shall include the relevant time entry and description and expense detail;

b. in the event any of the Service Parties has an objection to the compensation or reimbursement sought in a particular Fee Summary, it will, within ten (10) days of the receipt of the Fee Summary, serve upon (i) the Professional whose Fee

Summary is objected to, and (ii) except to the extent duplicative of the foregoing clause (i), the other Service Parties, a written "*Notice of Objection to Fee Summary*," setting forth the precise nature of the objection and the amount at issue. Thereafter, the objecting Service Party or Service Parties and the Professional whose Fee Summary is objected to will attempt to reach an agreement regarding the correct payment to be made. If the parties are unable to reach an agreement on the objection(s) within fifteen (15) days after receipt of such Notice of Objection to Fee Summary, the Professional whose Fee Summary is objected to will have the option of (i) filing the objection(s) together with a request for payment of the disputed amount with the court, or (ii) foregoing payment of the disputed amount until the next interim fee application hearing, at which time the Court will consider and dispose of the objection(s) if payment of the disputed amount is requested. The Diocese is authorized and directed to pay promptly the balance of the undisputed fees, up to eighty percent (80%), and one hundred percent (100%) of the disbursements requested that are not the subject of a Notice of Objection to Fee Summary;

c. commencing with the period beginning on the Petition Date and ending June 30, 2026, and for each three (3) month interval thereafter (each, an "**Interim Fee Period**"), on or before the forty-fifth (45th) day following the last day of the Interim Fee Period each of the Professionals shall file with the Court and serve on the Core Service List[3] an application for interim court approval and allowance, pursuant to section 331 of the Bankruptcy Code, of the compensation and reimbursement of expenses requested for the Interim Fee Period (the "**Interim Fee Application**") that incorporates the unfiled monthly Fee Summaries. Any Professional who fails to file an Interim Fee Application when due shall be ineligible to receive further interim payments of fees or expenses as provided herein until such time as the application is submitted. Upon approval of the Interim Fee Application, any Professional will be paid withheld amounts of approved fees and expenses for the applicable period. For the avoidance of doubt, each Professional shall file its first Interim Fee Application on or before August 14, 2026, and the first Interim Fee Application shall cover the Interim Fee Period from the Petition Date (or the effective date of the Professional's retention) through and including June 30, 2026;

d. the pendency of an application or a Court order that payment of compensation or reimbursement of expenses was improper as to a particular Fee Summary or Interim Fee Application will not disqualify a Professional from the future payment of compensation or reimbursement of expenses as set forth above; and

[3] "**Core Service List**" means the service list created by the Diocese comprised of the core parties-in-interest in the Chapter 11 case who would be entitled to receive service of all filings, including (i) the Office of the United States Trustee for Region 7; (ii) the Diocese; (iii) the attorneys for the Diocese; (iv) the attorneys for the Committee once that committee has been appointed, and until then, (a) the Plaintiffs in abuse lawsuits against the Diocese through their counsel and (b) the Diocese's twenty (20) largest unsecured trade creditors; (v) those persons who have formally appeared by filing a Notice of Appearance, a Request for Notice, or a similar document and requested notice in this case under Bankruptcy Rule 2002; (vi) the Texas Attorney General's Office; and (vii) known counsel to the foregoing.

e. neither (i) the payment of or failure to pay, in whole or in part, a Fee Summary or Interim Fee Application; nor (ii) the filing of or failure to file an Objection will bind any party in interest or the Court with respect to the final allowance of applications for compensation and reimbursement of expenses of Professionals.

3. As contemplated by this Order, "Professionals" are intended to include Husch Blackwell LLP ("**Husch Blackwell**") as bankruptcy counsel, Levatino | Pace PLLC ("**Levatino**"), as special counsel, and HMP Advisory Holdings, LLC dba Harney Partners ("**HP**") as financial advisor. The Diocese is authorized to later seek to engage other professionals in connection with these proceedings. This Order shall not apply to any Professional whose terms of compensation are otherwise provided by separate order of the Court, including Stretto, Inc., the Diocese's proposed Claims and Noticing Agent in this Chapter 11 case.

4. Any and all interim compensation and reimbursement of Professionals allowed in accordance with this Order shall remain subject to final allowance pursuant to further order of the Court.

5. This Order shall be effective and enforceable immediately upon its entry.

6. The Diocese is hereby authorized to take all actions it determines are necessary to effectuate the relief granted pursuant to this Order.

7. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation of this Order.

8. The Diocese will provide notice of this Order to: (i) the Office of the United States for Trustee for Region 7; (ii) the attorneys for the Committee once the committee has been appointed, and until then, (a) the Plaintiffs in abuse lawsuits against the Diocese through their counsel and (b) the Diocese's twenty (20) largest unsecured trade creditors; (iii) those persons who have formally appeared by filing a Notice of Appearance, a Request for Notice, or a similar document and requested notice in this case under Bankruptcy Rule 2002; (iv) the Texas Attorney

General's Office; (v) the Diocese's banks and financial institutions as identified on the Diocese's Schedules, including Weststar Bank through its counsel; (vi) the ad hoc group of abuse survivors through its counsel, Drew J. Glasnovich; and (vii) to the extent applicable, known counsel to the foregoing. A copy of this Motion and any orders approving it will also be made available on the Diocese's Case Information Website located at https://cases.stretto.com/dioceseofelpaso. The Diocese submits that, in light of the nature of the relief requested, no other or further notice need be given.

# # #

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