

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	:	Chapter 11
	:	Case No. 09-13560 (CSS)
CATHOLIC DIOCESE OF WILMINGTON, INC.	:	
	:	
	:	
Debtor.	:	

**JOINDER OF THE UNOFFICIAL COMMITTEE OF 91 STATE COURT ABUSE
SURVIVORS IN THE OBJECTION TO DEBTOR’S MOTION FOR ORDER
FURTHER EXTENDING THE PERIOD WITHIN WHICH THE DEBTOR MAY
REMOVE ACTIONS PURSUANT TO 28 U.S.C. 1452 AND FEDERAL RULES OF
BANKRUPTCY PROCEDURE 9006 AND 9027**

Jacobs & Crumplar, P.A. and The Neuberger Firm, P.A., are law firms representing many unsecured creditors asserting a personal injury claim against the Debtor in this Chapter 11 case.

Jacobs & Crumplar, P.A. and The Neuberger Firm, P.A. joins in the **“Objection to Debtor's Motion for Order Further Extending the Period Within Which the Debtor May Remove Actions Pursuant to 28 U.S.C. 1452 and Federal Rules of Bankruptcy Procedure 9006 and 9027”** (Docket No. 601) filed by Counsel for the Committee on July 26, 2010.

In addition we urge that to protect the judicial scheduling of a sister court an extension would be detrimental. As the court understands, the DeLuca cases had been set to commence the Monday after the bankruptcy was filed late on Sunday night. President Judge Vaughn will again be setting aside judicial resources and his time to hear these cases. To allow removal close to the October trial dates would only allow a second last minute disruption to the Superior Court and also to the client’s well being. Thus, by

requiring removal well before the trial dates, motions for remand and similar proceedings can occur thus preserving the trial dates and the resources of the Superior Court.

Thus, the Debtor's motion should be denied.

Respectfully Submitted,

THE NEUBERGER FIRM, P.A.

/s/ Thomas S. Neuberger _____

THOMAS S. NEUBERGER, ESQ. (# 243)
STEPHEN J. NEUBERGER, ESQ. (# 4440)
RAEANN WARNER, ESQ. (# 4931)

Two East Seventh Street, Suite 302
Wilmington, DE 19801
(302) 655-0582
TSN@NeubergerLaw.com
SJN@NeubergerLaw.com
RW@NeubergerLaw.com

JACOBS & CRUMPLAR, P.A.

/s/ Robert Jacobs _____

THOMAS C. CRUMPLAR, ESQ. (# 942)
ROBERT JACOBS, ESQ. (# 244)

Two East Seventh Street, Suite 400
Wilmington, DE 19801
(302) 656-5445
Tom@JCDELaw.com
Bob@JCDELaw.com

*Attorneys for the Unofficial Committee of 91
State Court Abuse Survivors*

Dated: July 27, 2010

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	:	Chapter 11
	:	Case No. 09-13560 (CSS)
CATHOLIC DIOCESE OF WILMINGTON, INC.	:	
	:	
	:	
Debtor.	:	

CERTIFICATE OF SERVICE

I, Robert Jacobs, hereby certify that on July 27, 2010 I electronically filed a **Joinder of the Unofficial Committee of 91 State Court Abuse Survivors in the Objection to Debtor's Motion for Order Further Extending the Period Within Which the Debtor May Remove Actions Pursuant to 28 U.S.C. 1452 and Federal Rules of Bankruptcy Procedure 9006 and 9027** with the Clerk of Court using CM/ECF and which will be served on all parties via CM/ECF in the manner indicated:

VIA ELECTRONIC FILING
All Counsel of Record.

Respectfully Submitted,

THE NEUBERGER FIRM, P.A.

/s/ Thomas S. Neuberger
THOMAS S. NEUBERGER, ESQ. (# 243)
STEPHEN J. NEUBERGER, ESQ. (# 4440)
RAEANN WARNER, ESQ. (# 4931)
Two East Seventh Street, Suite 302
Wilmington, DE 19801
(302) 655-0582
TSN@NeubergerLaw.com
SJM@NeubergerLaw.com
RW@NeubergerLaw.com

JACOBS & CRUMPLAR, P.A.

/s/ Robert Jacobs

THOMAS C. CRUMPLAR, ESQ. (# 942)

ROBERT JACOBS, ESQ. (# 244)

Two East Seventh Street, Suite 400

Wilmington, DE 19801

(302) 656-5445

Tom@JCDELaw.com

Bob@JCDELaw.com

*Attorneys for the Unofficial Committee of 91
State Court Abuse Survivors*

Dated: July 27, 2010