

**IN THE UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF LOUISIANA**

In re:

**THE ROMAN CATHOLIC CHURCH
OF THE ARCHDIOCESE OF NEW
ORLEANS,**

Debtor.¹

Case No. 20-10846

Chapter 11

Complex Case

Section “A”

**DECLARATION OF JOHN H. DENENEA, JR. AS ATTORNEY FOR CERTAIN ABUSE SURVIVORS
IN SUPPORT OF MOTION FOR ENTRY OF AN ORDER TO ENFORCE THE TERMS OF
CONFIRMATION ORDER OF THE SEVENTH AMENDED MODIFIED JOINT CHAPTER 11 PLAN
OF REORGANIZATION APPROVING SETTLEMENT AGREEMENT AND POLICY BUY-BACKS
WITH UNITED STATES FIDELITY & GUARANTY,
AND GRANTING RELATED RELIEF**

I, John H. Denenea, Jr., declare under penalty of perjury as follows:

1. I am an attorney, duly admitted and licensed to practice in the State of Louisiana and the State of Colorado. I am also admitted to practice in the following courts: (i) the Supreme Court of the United States, (ii) the United States Court of Appeals for the Fifth Circuit, (iii) the United States District Courts for the Eastern, Middle, and Western Districts of Louisiana, and (iv) the United States District Court for the District of Colorado. I submit this declaration as an Attorney for Certain Abuse Survivors which total over eighty (80) individuals along with my co-counsel Richard C. Trahan and Soren E. Gisleson, in support of the above-referenced Motion.²

¹ The last four digits of the Debtor’s federal tax identification number are 8966. The Debtor’s principal place of business is located at 7887 Walmsley Ave., New Orleans, LA 70125.

² All capitalized terms not otherwise defined in this Declaration have the meanings ascribed to them in the Seventh Amended Modified Joint Chapter 11 Plan of Reorganization for the Roman Catholic Church of the Archdiocese of New Orleans and Additional Debtors, Proposed by the Debtor, the Additional Debtors, and the Official Committee of Unsecured Creditors, Dated as of December 8, 2025 [ECF No. 4762] including the First Amended Plan Supplements [ECF No. 4610] (as may be modified, amended, or supplemented from time-to-time hereafter, the “Joint Plan”).

The testimony contained here is based upon personal knowledge unless otherwise indicated to be on information and belief.

2. I am generally familiar with the history of the Bankruptcy Case prior to confirmation of the Joint Plan, and was part of a team of lawyers that maintained several lawsuits against the Archdiocese of New Orleans that prompted the filing of the within Bankruptcy.

3. Part of that team included counsel for Certain Abuse Survivors as well as other survivors' counsel. Collectively, this group of survivors are represented by a least seventeen (17) different counsel in this proceeding and in various Abuse Claim litigation. These counsel include the following:

- a. Counsel for Individual Abuse Survivors, including Frank J. D'Amico, Jr., of Frank D'Amico, Jr. Law Offices;
- b. Craig Robinson of Robinson Law Offices LLC;
- c. Frank Elliot III & Robert Salim of Salim-Beasley LLC;
- d. T. Taylor Townsend;
- e. Gerald Meunier & Brittany Wolf-Freeman of Gainsburgh Benjamin David, Meunier & Warshauer L.L.C.;
- f. Richard Trahant of Trahant Law Office;
- g. Soren Gisleson & Joseph "Jed" Cain of Herman, Katz, Gisleson & Kain;
- h. John Denenea Jr. of Shearman-Denenea LLC;
- i. Frank Lamothe and Kristi Schubert of the Lamothe Law Firm LLC;
- j. Scott Delacroix of Delacroix & Delacroix LLC;
- k. Desiree Charbonnet of Charbonnet & Charbonnet;
- l. Jeff Green of JJC Law, LLC;
- m. Bill Arata, and
- n. Collin Melancon of Mansfield-Melancon.

These law firms represent around 290 or more survivors who voted on the Plan. The entire survivor vote results were 489 in favor; 2 against.

4. In particular, and in the context of the Motion, I was personally involved in (i) the settlement negotiations with United States Fidelity & Guaranty Company (“USF&G”) regarding their coverage obligations; (ii) the relevant pleadings; (iii) the Joint Plan; (iv) the Settlement Trust Agreement; and (v) the Settling Insurers’ Settlement Agreements.

5. In addition, I sought out and had discussions with various state court counsel representing Abuse Claimants (see paragraph 2), including counsel for the individual members of the UCC assorted other counsel for Certain Abuse Survivors. In these discussions, we weighed the potential of litigating with the Debtor and other related parties and with USF&G or settling with USF&G and ending the prospect of future litigation.

6. The main concerns involved in the consideration of litigating or trying the cases were (i) the potential length of time any litigation with the Diocese and other related parties and USF&G could take; (ii) the uncertainty regarding the outcome of any such litigation; (iii) the coverage defenses asserted by USF&G; (iv) the cost of any such litigation with USF&G, which cost would reduce Trust assets which would otherwise be available and distributed to Abuse Claimants; and (v) the amount of any settlement with USF&G.

7. In reaching this determination, we collectively considered the interests of the Abuse Claimants who are the beneficiaries of the Settlement Trust, and the risk, time and cost of litigation of myriad issues with USF&G. Uniformly, everyone I spoke with was in agreement with the terms of the Travelers settlement.

8. It was my understanding, and along other survivor counsel, that both from the Confirmation Hearing on December 8, 2025, and at the hearing on December 18, 2025, that there

would be a subsequent motion to enforce the existing terms of the Confirmed Plan, particularly Sections AA and BB, which recognizes that as a settling insurer USF&G is entitled to all of the same protections and benefits that the other settling insurers possess.

9. For the reasons stated above, and on behalf of numerous victim survivors, I support the Motion and ask the Court to grant the proposed relief.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 10th day of March 2026.



JOHN H. DENENEA, JR