

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF LOUISIANA

In re:	§	
	§	Case No. 20-10846
THE ROMAN CATHOLIC CHURCH OF	§	
THE ARCHDIOCESE OF NEW	§	Section “A”
ORLEANS,	§	
	§	Chapter 11
Debtor. ¹	§	

**NOTICE OF (A) CONFIRMATION HEARING,
(B) ESTABLISHMENT OF VOTING RECORD DATE, (C) SOLICITATION
AND VOTING PROCEDURES, (D) VOTING DEADLINE, AND (E) DEADLINE
FOR OBJECTING TO THE JOINT PLAN AND THE INSURANCE SETTLEMENT MOTION**

PLEASE TAKE NOTICE that:

1. On August 12, 2025, the United States Bankruptcy Court for the Eastern District of Louisiana (the “**Bankruptcy Court**”) entered an Order (the “**Disclosure Statement Order**”), [ECF 4253],² that: (a) authorizes the Roman Catholic Church of the Archdiocese New Orleans, the debtor and debtor-in-possession herein (the “**Debtor**” or “**Archdiocese**”) in this chapter 11 case (the “**Chapter 11 Case**”), the Additional Debtors, and the Official Committee of Unsecured Creditors (collectively the “**Plan Proponents**” and each a “**Plan Proponent**”), to solicit votes on the *Second Amended 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 August 6, 2025*, [ECF 4235], (as amended, modified, or supplemented from time to time, the “**Joint Plan**”); (b) approves the corresponding *Second Amended Modified Disclosure Statement for the Second Amended 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 August 6, 2025*, [ECF 4242], (the “**Disclosure Statement**”), as containing “adequate information” pursuant to section 1125 of the Bankruptcy Code; (c) approves the solicitation materials and documents to be included in the solicitation packages (the “**Solicitation Package**”); and (d) approves procedures for soliciting, receiving, and tabulating votes on the Joint Plan and Filing objections to the Joint Plan.

2. On July 29, 2025, the Archdiocese filed its *Motion for Entry of Orders Pursuant to Sections 363 and 105(a) of the Bankruptcy Code and Bankruptcy Rule 9019 Approving Insurance Settlement Agreements and Policy Buybacks with Certain Insurers and Granting Related Relief*, [ECF 4181], (the “**Insurance Settlement Motion**”). The Insurance Settlement Motion seeks entry of orders approving proposed settlement agreements (the “**Insurance Settlement Agreements**”), injunctions and policy buy-

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 Capitalized terms not otherwise defined herein will have the same meaning as set forth in the Joint Plan or the Disclosure Statement Order.

backs with the “**Settling Insurers.**”³ Pursuant to the Insurance Settlement Agreements, the Settling Insurers will buy back the Settling Insurers’ Policies and any Related Insurance Claims and Coverage Claims (the “**Purchased Property**”), excluding certain limited preserved coverage with respect to Catholic Mutual (the “**Preserved Coverage**”).

3. In connection with the Insurance Settlement Motion, the Archdiocese and Additional Debtors are seeking to settle and sell, free and clear of all liens, claims, encumbrances, and other Subject Interests, the Purchased Property. **This “free and clear” sale of the Purchased Property entails certain releases, injunctions, and other protective provisions in favor of the Settling Insurers. The sale proposed in the Insurance Settlement Motion requires approval of an injunction (the “Sale Injunction”) that will permanently enjoin all Entities who have held or asserted, or may in the future hold or assert (1) any and all Claims held by any Entity against any of the Covered Parties or Settling Insurers in relation to the Settling Insurers’ Policies, and (2) all Subject Interests held by any Entity in any of the Settling Insurers’ Policies (other than the Preserved Coverage).**

4. **Confirmation Hearing.** The Bankruptcy Court will hold a hearing to consider Confirmation of the Joint Plan and approval of the Insurance Settlement Motion (the “**Confirmation Hearing**”) commencing on **November 12, 2025, at 9:00 a.m. (Central Time)**, before the Honorable Meredith S. Grabill, in the Bankruptcy Court located at 500 Poydras Street, Suite B-601, New Orleans, LA 70130. You may participate in the Confirmation Hearing (a) in person, (b) by telephone through the Bankruptcy Court’s Teleconference Line, 504-517-1385, Conference Code 129611, or (c) by video at <https://gotomeet.me/JudgeGrabill> (audio will still be through the dial in Conference Code above). Parties in interest are directed to the Bankruptcy Court’s General Order 2021-2 for information on hearings, available at <https://www.laeb.uscourts.gov/>. The Confirmation Hearing may be adjourned from time to time without further notice other than by such adjournment being announced during the Confirmation Hearing, or by a notice of adjournment Filed with the Bankruptcy Court.

5. The Plan Proponents are soliciting acceptances of the Joint Plan from Creditors who hold Claims in the following Classes established in the Joint Plan (the “**Voting Classes**”): Class 3 (Known Abuse Claims); Class 4 (Unknown Abuse Claims); Class 6 (Bond Claims); Class 7 (General Unsecured Claims and Trade Claims—Debtor); and Class 8 (Non-Abuse Personal Injury Claims—Debtor).

6. **Voting Record Date.** **August 14, 2025, at 11:59 p.m. (Central Time)** is the date for determining which holders of Claims in the Voting Classes are entitled to vote on the Joint Plan (the “**Voting Record Date**”); provided, however, that if a Known Abuse Claimant files an Abuse Proof of Claim against an Additional Debtor, then the Voting Record Date for such Known Abuse Claim shall be **October 15, 2025, at 11:59 p.m. (Central Time)**.

7. **Voting Deadline.** **October 29, 2025, at 11:59 p.m. (Central Time)** is the deadline to vote on the Joint Plan (the “**Voting Deadline**”). If you receive a Solicitation Package, including a Ballot, and intend to vote on the Joint Plan, you *must*: (a) carefully follow the instructions in the Ballot; (b) complete *all* of the required information on the Ballot; and (c) execute and return your completed Ballot

³ As further defined in the Joint Plan and applicable Insurance Settlement Agreements, the Settling Insurers include, without limitation, (a) SPARTA Insurance Company and American Employers’ Insurance Company (“**SPARTA**”) (subject to condition precedent); (b) United States Fire Insurance Company (“**U.S. Fire**”), International Insurance Company (“**International**”), and Westchester Fire Insurance Company and Westchester Surplus Lines Insurance Company individually and, to the extent that policies issued by U.S. Fire and/or International were novated to or assumed by either or both of them (“**U.S. Fire/International**”); (c) Catholic Mutual Relief Society of America (“**Catholic Mutual**”); (d) Puritan Insurance Company, The Manhattan Fire and Marine Insurance Company, and Westport Insurance Corporation (“**Puritan**”); (e) National Union Fire Insurance Company of Pittsburgh, Pa. (“**National Union**”); and (f) Twin City Fire Insurance Company and First State Insurance Company (“**Twin City**”), along with the Related Persons of the foregoing.

according to and as set forth in detail in the instructions on the Ballot so that it is *actually received* by Donlin, Recano & Company, LLC (the “**Claims and Voting Agent**”), as instructed in the Ballot, on or before the Voting Deadline. *A failure to follow such instructions may disqualify your vote.*

8. **Creditors Entitled to Vote.** Only Creditors who hold a Claim in a Voting Class will be entitled to vote with respect to such Claims, as set forth in the Solicitation and Voting Procedures (attached to the Disclosure Statement Order as Schedule 2) (the “**Procedures**”).

9. **Establishing Claim Amounts for Voting Purposes Only.** Any amounts filled in on Ballots by the Plan Proponents through the Claims and Voting Agent are not binding for purposes of Allowance or Distribution. In tabulating votes, for voting purposes only, the standard set forth in the Procedures will be used to determine the amount of the Claim associated with each Creditor’s vote.

10. **Confirmation Objection Deadline.** Objections to the Joint Plan or Insurance Settlement Motion must be made in writing and Filed with the Bankruptcy Court on or before **October 30, 2025, at 11:59 p.m. (Central Time)** (the “**Confirmation Objection Deadline**”). At the Confirmation Hearing, the Bankruptcy Court has the discretion to only consider those objections made in writing and timely Filed on or before the Confirmation Objection Deadline. If you are an Abuse Claimant, you may file your objection under seal, so that it is not accessible to the public. Failure to file and serve any objection to the Joint Plan or Insurance Settlement Motion in conformity with the foregoing procedures may result in the objecting party not being heard at the Confirmation Hearing.

11. **The Joint Plan contains, among other things, the following:**

IMPORTANT INFORMATION ABOUT THE RELEASES, INJUNCTIONS, EXCULPATION PROVISIONS, GATEKEEPER INJUNCTION, AND BAR DATES CONTAINED IN THE JOINT PLAN, AND THE RELEASES AND INJUNCTION PURSUANT TO THE INSURANCE SETTLEMENTS

YOUR RIGHTS MAY BE AFFECTED BY THE JOINT PLAN AND INSURANCE SETTLEMENT MOTION. THEREFORE, YOU SHOULD READ THE DISCLOSURE STATEMENT, JOINT PLAN, INSURANCE SETTLEMENT MOTION, INSURANCE SETTLEMENT AGREEMENTS, AND RELATED MATERIALS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.

A. THE JOINT PLAN CONTAINS RELEASES AND INJUNCTIONS THAT RELATE TO AND AFFECT THE RIGHTS, CLAIMS, AND/OR CAUSES OF ACTION THAT CREDITORS, INCLUDING ABUSE CLAIMANTS, MAY HAVE AGAINST THE DEBTOR, REORGANIZED DEBTOR, THE ADDITIONAL DEBTORS, AND THE REORGANIZED ADDITIONAL DEBTORS AS PROVIDED IN ARTICLE 12 OF THE JOINT PLAN.

B. THE JOINT PLAN CONTAINS INJUNCTIONS IN FAVOR OF THE SETTLING INSURERS AS PROVIDED IN SECTIONS 12.4, 12.5, AND 12.15 OF THE JOINT PLAN THAT ENJOIN (1) ANY AND ALL CLAIMS HELD BY ANY ENTITY AGAINST ANY OF THE PROTECTED PARTIES AND ALL CLAIMS AGAINST THE SETTLING INSURERS IN RELATION TO THE SETTLING INSURERS’ POLICIES, AND (2) ALL SUBJECT INTERESTS HELD BY ANY ENTITY IN ANY OF THE SETTLING INSURERS’ POLICIES.

C. THE JOINT PLAN CONTAINS CERTAIN EXCULPATORY AND LIMITATION OF LIABILITY PROVISIONS THAT RELATE TO AND AFFECT THE RIGHTS, CLAIMS, AND/OR CAUSES OF ACTION THAT CREDITORS, INCLUDING ABUSE CLAIMANTS, MAY HAVE AGAINST THE EXCULPATED PARTIES AS PROVIDED IN SECTION 12.3 OF THE JOINT PLAN.

D. THE JOINT PLAN CONTAINS A GATEKEEPER INJUNCTION IN SECTION 12.8 REQUIRING ENJOINED PARTIES TO DEMONSTRATE THEY HAVE A COLORABLE CLAIM THAT IS NOT RELEASED, ENJOINED, OR OTHERWISE BARRED BEFORE ASSERTING ANY SUCH CLAIM. FAILURE TO SEEK RELIEF FROM THE BANKRUPTCY COURT BEFORE FILING SUCH CLAIM CAN RESULT IN AN AWARD OF ATTORNEYS' FEES.

E. IF APPROVED BY THE BANKRUPTCY COURT, THE JOINT PLAN WILL ESTABLISH A BAR DATE OF DECEMBER 2, 2025 BY WHICH CERTAIN CREDITORS, INCLUDING ABUSE CLAIMANTS, WHO HAVE NOT ALREADY FILED A PROOF OF CLAIM IN THE CHAPTER 11 CASE OR FILED SUIT AGAINST THE ARCHDIOCESE OR AN ADDITIONAL DEBTOR BY AUGUST 14, 2025, MUST FILE A PROOF OF CLAIM. FAILURE TO FILE A PROOF OF CLAIM IN ACCORDANCE WITH SECTIONS 6.11 AND 6.12 OF THE JOINT PLAN WILL RESULT IN DISALLOWANCE OF CERTAIN CLAIMS AGAINST THE ADDITIONAL DEBTORS.

BEFORE YOU VOTE, YOU SHOULD REVIEW THE ENTIRE DISCLOSURE STATEMENT, JOINT PLAN, INSURANCE SETTLEMENT AGREEMENTS, AND INSURANCE SETTLEMENT MOTION INCLUDING, BUT NOT LIMITED TO, THE PROVISIONS DISCUSSED ABOVE.

12. The Plan Supplements. The Plan Proponents will File Plan Supplements on or before **October 20, 2025, at 11:59 p.m. (Central Time)**, and will serve a Notice of Filing on parties in interest.

13. Obtaining Solicitation Materials.

- a. If you have any procedural questions regarding the Insurance Settlement Motion, the Disclosure Statement or the Joint Plan, or if you would like to obtain a copy of a Ballot, you should contact the noticing, claims, and voting agent retained by the Debtor in the Chapter 11 Case, Donlin, Recano & Company, LLC (the “**Claims and Voting Agent**”), by: (a) telephoning the Claims and Voting Agent at 1-877-476-4389 (toll free); (b) visiting the restructuring website, maintained by the Claims and Voting Agent, at <https://www.donlinrecano.com/Clients/rcano/Index>; (c) writing the Claims and Voting Agent, at Donlin, Recano & Company, LLC, Re: The Roman Catholic Church of the Archdiocese of New Orleans, Attn: Voting Department, P.O. Box 2053, New York, NY 10272-2042; and/or (d) emailing the Claims and Voting Agent at DRCVote@angeiongroup.com.
- b. If you do not need a Ballot, but would like to inspect and/or obtain a copy of the Disclosure Statement, the Joint Plan, the Disclosure Statement Order, the Insurance Settlement Motion, or the Insurance Settlement Agreements, you may inspect and print copies by visiting (a) the Court’s website at <https://www.laeb.uscourts.gov/archdioceseofneworleansch11> (without charge), (b) the Bankruptcy Court’s electronic case management system website at <https://ecf.laeb.uscourts.gov> (fee charged), or (c) the restructuring website, maintained by the Claims and Voting Agent, at <https://www.donlinrecano.com/Clients/rcano/Index>.
- c. All pleadings and other documents Filed in the Chapter 11 Case are available for inspection and copying (a) by visiting the restructuring website, maintained by the Claims and Voting Agent, at <https://www.donlinrecano.com/Clients/rcano/Dockets> (without charge), or (b) on the Bankruptcy Court’s electronic case management system website at <http://www.laeb.uscourts.gov> (fee charged).
- d. To access documents on the Bankruptcy Court’s electronic case management system, you will need a PACER password and login, which can be obtained at pacer.psc.uscourts.gov.

BINDING NATURE OF THE JOINT PLAN

IF CONFIRMED, THE JOINT PLAN AND RELATED DOCUMENTS WILL BIND ALL CREDITORS TO THE MAXIMUM EXTENT PERMITTED BY APPLICABLE LAW, WHETHER OR NOT SUCH CREDITOR WILL RECEIVE OR RETAIN ANY PROPERTY OR INTEREST IN PROPERTY UNDER THE JOINT PLAN, HAS FILED A PROOF OF CLAIM, FAILED TO VOTE TO ACCEPT OR REJECT THE JOINT PLAN, OR VOTED TO REJECT THE JOINT PLAN.

Dated: August 14, 2025

/s/ Mark A. Mintz

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