

LEGAL NOTICE

Multimillion Dollar Plan Proposed to Pay Sexual Abuse Claims in the Archdiocese of New Orleans Bankruptcy

***Your rights could be impacted if you have Sexual Abuse Claims against
Catholic parishes, schools, or ministries.***

- Please read this notice carefully, as it may impact your rights regarding your Sexual Abuse Claim.
- The Roman Catholic Church of the Archdiocese of New Orleans (“**Archdiocese**”) and 157 related Catholic organizations (“**Catholic Entities**”) have agreed to pay people who validly claim they were sexually abused by clergy or church personnel. This settlement would resolve claims against the Archdiocese and Catholic Entities through a joint bankruptcy plan (“**Joint Plan**”).
- If you believe you were sexually abused in connection with the Archdiocese or any Catholic Entities, you may have an opportunity to vote on a bankruptcy plan that governs how claims will be funded and paid.
- Under the Joint Plan, qualifying Sexual Abuse Claims will be compensated through a Settlement Trust. The Joint Plan may only move forward if two-thirds of abuse claimants who vote, accept the Plan.
- If there are enough votes to accept the Plan, the Catholic Entities will file for bankruptcy to become part of the settlement alongside the Archdiocese.
- A Settlement Trust will be created to pay Sexual Abuse Claimants. If the Joint Plan is approved, you cannot sue the Archdiocese, Catholic Entities, or the Settling Insurers in the future on account of sexual abuse that occurred before the respective bankruptcy filings of the Archdiocese or the Catholic Entities.

YOUR LEGAL RIGHTS AND OPTIONS IN THE BANKRUPTCY	
FILE A PROOF OF CLAIM	If you have not already filed a proof of claim against the Archdiocese, or filed a lawsuit against the Archdiocese or any of the Catholic Entities, then filing a proof of claim is the only way to ensure you preserve any right to compensation.
VOTE ON THE PLAN	Vote to accept or reject the Joint Plan.
OBJECT TO THE PLAN	Tell the Bankruptcy Court what you do not like about the Joint Plan.
DO NOTHING	If you do nothing, and you have not filed a proof of claim or lawsuit as mentioned above, you will not be entitled to vote on the Joint Plan and may not receive any compensation from the Settlement Trust.
CONFIRMATION HEARING	If two-thirds or more of voters accept the Joint Plan, the Catholic Entities will file for bankruptcy. The Bankruptcy Court will hold a hearing to consider confirmation of the Joint Plan, beginning on November 17, 2025.

QUESTIONS? 1-877- 476-4389 (TOLL-FREE) OR VISIT WWW.NOLACHURCHCLAIMS.COM

BASIC INFORMATION

1. Why was this notice issued?

The Bankruptcy Court authorized this notice. You may have the right to file a Sexual Abuse Claim (if you have not already done so) and to vote on the proposed Joint Plan in this bankruptcy case if you were sexually abused by persons associated with the Archdiocese or Catholic Entities regardless of how old you are today. This includes sexual abuse in connection with entities or activities associated with the Archdiocese, including schools, orphanages, parishes, or Catholic Charities.

The Archdiocese case is filed in the U.S. Bankruptcy Court for the Eastern District of Louisiana, and the case is known as *In re The Roman Catholic Church of the Archdiocese of New Orleans*, No. 20-10846 (Bankr. E.D. La.). The Bankruptcy Court judge overseeing the case is the Honorable Meredith Grabill.

2. Who are the Catholic Entities?

The Catholic Entities are 157 Catholic organizations related to the Archdiocese that have not yet filed for bankruptcy but plan to do so if at least two-thirds of Sexual Abuse Claimants who vote, support the Joint Plan. These organizations will contribute money to the Settlement Trust and include:

- Catholic parishes (individual churches)
- Catholic schools and academies
- Catholic Charities organizations
- Other Catholic ministries and agencies

A complete list of the Catholic Entities is available at www.NOLAchurchclaims.com or by calling 1-877-476-4389. Please note, in the Joint Plan and Disclosure Statement, the Catholic Entities are referred to as “Additional Debtors.”

3. What is a debtor?

A debtor is a person or organization that has filed for bankruptcy protection. The Archdiocese is a debtor, and the Catholic Entities will become debtors only if enough Sexual Abuse Claimants vote to accept the Joint Plan.

4. Do I need to file a proof of claim based on my sexual abuse?

If you previously filed a proof of claim against the Archdiocese or a lawsuit against the Archdiocese or a Catholic Entity alleging sexual abuse on or before August 14, 2025:

- You do NOT need to file a new claim.
- Your existing claim covers the Catholic Entities automatically.
- You can vote on the proposed Joint Plan.

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If you have Sexual Abuse Claims against the Catholic Entities, and you have NOT filed a proof of claim against the Archdiocese or a lawsuit against the Archdiocese or a Catholic Entity on or before August 14, 2025:

- You MUST file a claim using the Additional Debtors' Abuse Proof of Claim Form.
- If you file by October 15, 2025, you will be able to vote, and you may be entitled to compensation if the Bankruptcy Court approves the Joint Plan.
- If you file by December 2, 2025, you will not be able to vote, but you may be entitled to compensation if the Bankruptcy Court approves the Joint Plan.

SEXUAL ABUSE CLAIMS

5. What is considered sexual abuse?

You have a Sexual Abuse Claim if you experienced sexual abuse. **Sexual abuse** is defined to include but is not limited to any of the following acts:

- a. Touching by the abuser of the person's intimate body parts (genitals, breasts, or buttocks), touching by the person of the abuser's intimate body parts, showing pictures of the person's body or other persons' bodies, taking pictures of the person's body, showing pornography, or making images of the person while naked or engaged in any sexual activity, or any sexualized interaction, including observing the person in bathing, toileting, or undressing, which was made possible by the abuser's position of authority, or by the inducement of the abuser, or;
- b. Sexual intercourse, simulated intercourse, masturbation, cunnilingus, fellatio, anal intercourse, or any intrusion, however slight, to the genital or anal openings:
 - (i) Of the person's body by any part of the abuser's body or any object used by the abuser for this purpose;
 - (ii) Of the person's body by any part of the abuser's body or by any part of the body of another person, or by any object used by the abuser or another person for this purpose;
- c. Inappropriate physical contact and/or contact that infringes upon another's personal, physical boundaries, including but not limited to groping, kissing, extended hugging, and/or any unwelcomed touching;
- d. Grooming or trying to create a special relationship, including but not limited to: talk of a sexual nature, talk of a romantic nature, communications expressing individual love to the person, as opposed to a salutation, providing material resources or experiences which induce the person into a relationship where trust is then violated; and
- e. Sexualized acts between minors if encouraged or arranged by the abuser.

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Please note that sexual abuse includes acts that would be considered a sexual offense under Louisiana law.

If you have a claim from other types of abuse, including non-sexual physical abuse, non-sexual emotional abuse, bullying or hazing, you should file a General Proof of Claim (Official Bankruptcy Form 410).

6. Who should file an Abuse Proof of Claim?

You should file an Abuse Proof of Claim if you have a Sexual Abuse Claim as defined above against the Catholic Entities and have not previously filed a proof of claim against the Archdiocese or filed a lawsuit against the Archdiocese or any of the Catholic Entities by August 14, 2025. You should file an Abuse Proof of Claim even if you:

- Did or did not report your sexual abuse to the Archdiocese or to anyone else;
- Believe the applicable statute of limitations may have run on your Sexual Abuse Claim;
- Previously asserted unsettled claims in connection with the sexual abuse;
- Previously had your Sexual Abuse Claim paid in full by the Archdiocese under a settlement, but you believe you may have additional Sexual Abuse Claims beyond what was released in the settlement agreement;
- Are included in, or represented by, another action with respect to your Sexual Abuse Claim, including *In re Boy Scouts of America and Delaware BSA, LLC (Bankr. D. Del.)*.

You may submit an Abuse Proof of Claim regardless of your age now or the length of time that has passed since the sexual abuse took place.

7. What if I am still not sure if I have a Sexual Abuse Claim?

You should consult with an attorney if you have any questions, including whether you should file an Abuse Proof of Claim.

8. How can I file my Abuse Proof of Claim?

A copy of the Additional Debtors' Abuse Proof of Claim Form is enclosed. You may also obtain a copy of the form by following the instructions below.

The Abuse Proof of Claim must be completed by you and mailed or submitted to Donlin, Recano & Company, LLC, the Bankruptcy Court-approved agent for the Debtor (the “**Claims Agent**”), **no later than December 2, 2025, at 11:59 p.m. (Central Time)** as follows:

- a) If sent by mail, send to: Donlin, Recano & Company, LLC, Re: The Roman Catholic Church of the Archdiocese of New Orleans, P.O. Box 2053, New York, NY 10272-2042; or

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- b) If sent by hand delivery or overnight courier, send to: Donlin, Recano & Company, LLC, c/o Angeion Group, Re: The Roman Catholic Church of the Archdiocese of New Orleans, 200 Vesey Street, 24th Floor, New York, NY 10281; or
- c) If submitted electronically, by using the interface available at: <https://www.donlinrecano.com/Clients/rcano/FileSexualAbuseClaim> and following the instructions set forth therein.

An Abuse Proof of Claim Form sent by any other means (such as facsimile transmission or email through a different manner than described in (c) above) **will not** be accepted.

For additional copies of the Abuse Proof of Claim Form: (a) photocopy the enclosed Abuse Proof of Claim Form; (b) contact the claims agent Donlin, Recano & Company, LLC by e-mail at rcanoinfo@donlinrecano.com or phone, toll free at 1-877-476-4389, between the hours of 9:00 a.m. and 5:00 p.m. (Eastern Time), Monday through Friday, or (c) visit the Debtor's website at: <https://www.donlinrecano.com/Clients/rcano/Index>.

If you have questions, you can contact your attorney or call 1-877-476-4389 to speak to the Claims Agent. The Claims Agent can provide information about how to file a claim but cannot offer any legal advice.

Please note that the Archdiocese's staff and the Catholic Entities' staff are not permitted to give legal advice. You should consult your own attorney for assistance regarding any other inquiries, such as questions concerning the completion or filing of a proof of claim.

9. Will my information be kept confidential?

Your information will be kept confidential, subject to the limitations described below. The Bankruptcy Court has set up a procedure to protect your privacy. In order to protect your privacy, please do not file your Abuse Proof of Claim with the Bankruptcy Court. Instead, you must file according to the directions above.

Abuse Proofs of Claim will not be available to the public unless you choose to release that information by checking the box in Part 1 of the Abuse Proof of Claim Form. However, information about your Sexual Abuse Claim will be confidentially provided to the following parties:

- The Archdiocese, the Catholic Entities, and their attorneys and advisors;
- Certain insurers of the Archdiocese and the Catholic Entities, including authorized claims administrators of such insurers and their reinsurers and counsel;
- Attorneys for the Official Creditors' Committee and its members;
- Attorneys at the Office of the United States Trustee for the Eastern District of Louisiana;

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- Honorable Michael Hogan (retired judge), the unknown claims representative appointed in the bankruptcy case;
- The Claims Agent (Donlin, Recano & Company, LLC);
- Any special arbitrator, mediator, or claims reviewer appointed to review and evaluate Sexual Abuse Claims;
- Any trustee, or functional equivalent thereof, appointed to administer payments to holders of Sexual Abuse Claims; and
- Such other persons that the Bankruptcy Court determines need the information in order to evaluate Sexual Abuse Claims.

Please note that information in your Abuse Proof of Claim may be disclosed to governmental authorities under mandatory reporting laws in many jurisdictions.

THE JOINT PLAN

10. What is the proposed Joint Plan and how will it compensate Sexual Abuse Claimants?

The Archdiocese, the Catholic Entities, and the Official Creditors' Committee are asking the Bankruptcy Court to approve the Joint Plan to pay people who were sexually abused. The proposed settlement includes:

- \$130 million in immediate cash from the Archdiocese and Catholic Entities.
- \$20 million in additional payments from the Archdiocese and Catholic Entities.
- \$50 million in additional payments from the Archdiocese and Catholic Entities.
- Approximately \$29 million from insurance company settlements (see Question 11).

A Settlement Trust will be created to pay approved claims. If at least two-thirds of voters support the Joint Plan, the Catholic Entities will also file their own cases and join the settlement.

11. What is the Insurance Settlement and why is it important?

The Archdiocese has filed a motion asking the Bankruptcy Court to approve settlement agreements with certain insurance companies. These agreements are designed to add at least \$29,275,000 to the Settlement Trust for survivors, on top of the Archdiocese and Catholic Entities' contributions. Under these agreements, the insurers will buy back their insurance policies and related claims from the Archdiocese and Catholic Entities. In return, the insurers will receive protections from future lawsuits, including an injunction that prevents survivors from suing these insurers later for claims related to those policies. These protections will only take effect if the Court approves both the Joint Plan and the Insurance Settlement Motion. More

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details about the Insurance Settlement Motion are available at www.NOLAchurchclaims.com or by calling 1-877-476-4389.

12. What child protection provisions are part of the Joint Plan?

The Joint Plan also provides for specific non-monetary protections for children. These are detailed in a separate document called the “Non-Monetary Plan Provisions to Foster Child Safety and Prevent Child Sexual Abuse,” which is included as Joint Plan Exhibit E. This document lays out actions the Archdiocese and Catholic Entities agree to undertake to enhance child safety and reduce the risk of abuse including increased accountability and abuser discipline and transparency through oversight, record keeping and disclosure, and the publication of abuse related documents through an archive to be administered by an approved third-party academic institution.

13. How much money could I get from the Joint Plan?

Individual payments depend on several factors, including: (a) severity and nature of the abuse, (b) the total number of valid claims received, (c) the results of the Christopher Homes sale, (d) the results of litigation against a non-settling insurance company, and (e) the evaluation of claims by a neutral third-party reviewer (the “**Abuse Claims Reviewer**”).

Because each claim is unique, exact payment amounts cannot be determined until all claims are reviewed. All approved claims will be paid from the Settlement Trust, and claimants with more severe and long-lasting impacts generally will receive higher payments.

14. Does the Joint Plan cover punishment or deterrent damages?

No. The Joint Plan explicitly states that claims for punitive or exemplary damages (punishment or deterrent damages) will not receive payment from the Settlement Trust. Claimants will only receive compensation for actual harm experienced.

15. How was the Claims deadline set?

The Joint Plan proposes that the Claims deadline be set on December 2, 2025, the last day of the confirmation hearing. Ultimately, the Bankruptcy Court will decide if the proposed deadline is approved.

VOTING ON THE PLAN

16. Who can vote on the Joint Plan?

You can vote on the Joint Plan if you are:

- A Sexual Abuse Claimant who filed a claim or a lawsuit against the Archdiocese by August 14, 2025.
- A Sexual Abuse Claimant who filed a lawsuit against the Catholic Entities by August 14, 2025.

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- A Sexual Abuse Claimant who files a claim against the Catholic Entities by October 15, 2025.

17. How can I vote on the Joint Plan?

You or your attorney will receive a ballot if you are eligible to vote on the Joint Plan. To be counted, your signed Ballot indicating your acceptance or rejection of the Joint Plan must be received by Donlin, Recano & Company, LLC, the appointed claims and voting agent, no later than **11:59 p.m. (Central Time) on October 29, 2025.**

Ways to submit your vote:

- **Online at:** <https://bankruptcy.angeiongroup.com/Clients/rcano/Vote> - You will need your unique eBallot ID#: _____
- **By mail to:**

Donlin, Recano & Company, LLC
Re: Archdiocese of New Orleans -- Voting
P.O. Box 2053
New York, NY 10272-2042

- **By overnight delivery or hand delivery to:**

Donlin, Recano & Company, LLC, c/o Angeion Group
Re: The Roman Catholic Church of the Archdiocese of New Orleans
Attn: Voting Department
200 Vesey Street, 24th Floor
New York, NY 10281

OBJECTING TO THE PLAN

18. Can I object to the Joint Plan if I don't like it?

If you disagree with the Joint Plan or any part of it—including who is being released from future lawsuits—you can file a written objection with the Bankruptcy Court by **November 6, 2025, at 11:59 p.m. (Central Time)**. You can vote against the Joint Plan without filing an objection as well. If you do file an objection, your objection must include:

- Claimant's name and contact information.
- Clear and specific reasons for the objection.
- Supporting documentation or evidence (if applicable).

Objections must be filed in writing and sent to the Clerk of the Bankruptcy Court.

United States Bankruptcy Court
Eastern District of Louisiana

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500 Poydras St., Courtroom B709
New Orleans, Louisiana 70130

19. What about Louisiana Law and Direct Action Rights?

Under Louisiana law, you normally have the right to sue an insurance company directly, even if you never sued the Archdiocese or Catholic Entities. If the Joint Plan is approved, this “direct action” right will be permanently eliminated for the insurers participating in the settlement. A full list of Settling Insurers is in the Joint Plan and Schedule 3 of the Ballot and available at the website or by calling the toll-free number.

20. What are the Settling Insurer injunctions?

These injunctions mean that you will not be able to sue the insurers that are contributing money to the Settlement Trust. Even if the Joint Plan is approved, you will be able to sue the non-settling insurer.

DOING NOTHING

21. What happens if I do nothing?

If you take no action, and the Joint Plan is approved by the Bankruptcy Court:

- **And you previously filed against the Archdiocese:** Your claim remains in place, and you will be bound by the Joint Plan’s terms.
- **And you have not filed any claim:** You will lose all rights to compensation from the Archdiocese, Catholic Entities, and the settling insurance companies.

THE CONFIRMATION HEARING

22. When and where will the Bankruptcy Court decide whether to approve the Joint Plan?

The Bankruptcy Court set a hearing, beginning on **November 17, 2025, at 9:00 a.m. CT**, to consider confirmation of the Joint Plan. The hearing will be held at the United States Bankruptcy Court, Eastern District of Louisiana 500 Poydras St., Courtroom B709, New Orleans, Louisiana 70130.

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ADDITIONAL INFORMATION

23. How do I report my sexual abuse to the authorities?

Reporting the sexual abuse protects other persons. You can learn more about how to report sexual abuse at <http://www.dcfslouisiana.gov/page/109>.

Please know that reporting sexual abuse is different than filing a proof of claim in the Archdiocese's bankruptcy case.

24. What happens if I do not file any Abuse Proof of Claim?

If you fail to file any Sexual Abuse Claim in this bankruptcy (and you had not filed a lawsuit against the Archdiocese or the Catholic Entities on or before August 14, 2025), you may not be able to:

- Vote on the Joint Plan; or
- Receive any compensation from the Archdiocese, the Catholic Entities, or the settling insurers for your Sexual Abuse Claim.

25. What is Chapter 11?

The main objectives of chapter 11 are to:

- Propose a plan of reorganization to address claims,
- Have eligible claimants vote to accept or reject the plan, and
- Implement the plan if the Bankruptcy Court approves it.

26. What is a Disclosure Statement?

The Disclosure Statement is a summary of information about the Archdiocese, Catholic Entities and the Joint Plan. It contains more detailed information about the Archdiocese's history, litigation against the Archdiocese, and significant events that have led to the Joint Plan. It also provides more detail about the Joint Plan and what happens if the Joint Plan is approved by the Bankruptcy Court, including how claims will be resolved and payments will be made.

The Joint Disclosure Statement is available online at www.NOLACHURCHCLAIMS.COM.

You may want to consult with an attorney regarding this notice and whether you should file an Abuse Proof of Claim or vote on the Joint Plan.

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