

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. <sup>1</sup>	§	

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**SOLICITATION AND VOTING PROCEDURES**

**PLEASE TAKE NOTICE** that, 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],<sup>2</sup> 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 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.

**PLEASE TAKE FURTHER NOTICE** that, among other things, the Disclosure Statement Order approves these Solicitation and Voting Procedures (these “**Procedures**”), and provides as follows:

**A. THE VOTING RECORD DATE**

The record date for purposes of determining which Creditors holding Claims in the Voting Classes are entitled to vote to accept or reject the Joint Plan (the “**Voting Record Date**”) shall be **August 14, 2025, at 11:59 p.m. (Central Time)**; 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)**.

**B. THE VOTING DEADLINE**

The Bankruptcy Court has established **October 29, 2025, at 11:59 p.m. (Central Time)**, as the voting deadline (the “**Voting Deadline**”) for the Joint Plan. The Plan Proponents may extend the Voting Deadline, in their discretion, without further Order of the Bankruptcy Court. To be counted as votes to accept or reject the Joint Plan, all Ballots (as defined below) must be properly executed, completed, and

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<sup>1</sup> 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.

<sup>2</sup> Capitalized terms not otherwise defined herein will have the same meaning as set forth in the Joint Plan or the Disclosure Statement Order.

delivered to Donlin, Recano & Company, LLC (the “**Claims and Voting Agent**”) so that such Ballots *are actually received on or before the Voting Deadline* by one of the following methods: (i) first class mail (using the reply envelope provided in the Solicitation Package or otherwise); (ii) overnight courier; (iii) hand delivery; or (iv) the E-Balloting Portal (for Claims in Classes 3, 4, 7, and 8) or email (for Claims in Class 6). The proper return address for the Claims and Voting Agent is shown on each Ballot. The voting and tabulation procedures found at Section E.1 through Section E.4 of these Procedures govern the procedures for voting, allowance for voting purposes, and Ballot tabulation.

### C. **CONFIRMATION OBJECTION DEADLINE**

The last day to File a written objection to Confirmation of the Joint Plan is **October 30, 2025, at 11:59 p.m. (Central Time)** (the “**Confirmation Objection Deadline**”).

### D. **FORM, CONTENT, AND MANNER OF NOTICES**

1. **The Solicitation Package.** The following materials will constitute the Solicitation Package:

- a. The approved Disclosure Statement, attached to the Disclosure Statement Order as **Schedule 1**, together with the Joint Plan and other exhibits;
- b. These Procedures;
- c. The applicable form of ballot, in substantially the form of the ballots attached to the Disclosure Statement Order as **Schedule 3A** through **Schedule 3E** (each, a “**Ballot**” and collectively, the “**Ballots**”);
- d. A letter from the Debtor in substantially the form attached to the Disclosure Statement Order as **Schedule 4A**, which urges the Creditors holding Claims in each of the Voting Classes to vote to accept the Joint Plan (the “**Archdiocese Support Letter**”), and for Class 3 Claims, a letter from the Creditors’ Committee, in substantially the form attached to the Disclosure Statement Order as **Schedule 4B**, recommending that Known Abuse Claimants vote to accept the Joint Plan (the “**Survivors’ Committee Letter**”);
- e. The Notice of the Confirmation Hearing, in substantially the form attached to the Disclosure Statement Order as **Schedule 5** (the “**Confirmation Hearing Notice**”);
- f. The Disclosure Statement Order (without exhibits); and
- g. A pre-addressed, postage pre-paid reply envelope.

2. **Distribution of the Solicitation Package.** On or before **August 28, 2025, at 11:59 p.m. (Central Time)** (the “**Solicitation Deadline**”):

- a. The Plan Proponents will distribute, or cause to be distributed by first-class mail, postage prepaid, the following documents in the Solicitation Package in electronic format (i.e., on a CD-ROM or flash drive) to Creditors holding Claims in Voting Classes: (i) the Disclosure Statement (with exhibits); and (ii) an approved copy of the Proposed Order (without exhibits).
- b. All other contents of the Solicitation Package, including (i) the Archdiocese Support Letter and, if applicable, the Survivors’ Committee Letter;<sup>3</sup> (ii) the Confirmation Hearing Notice; (iii) these Procedures; (iv) the applicable Ballot; and (v) a pre-addressed, postage pre-paid reply envelope, will be provided, by first-class mail, postage prepaid in paper format only.

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<sup>3</sup> The Survivors’ Committee Letter shall be included as a separate document at the top of the Class 3 Solicitation Package and may be printed on colored paper.

- c. The Plan Proponents also will mail, or cause to be mailed, by first-class mail, postage prepaid, the materials in the Solicitation Package (excluding Ballots) to the U.S. Trustee.

Any party that receives any portion of the Solicitation Package in electronic format, but would prefer paper format, may request paper copies of the materials previously received in electronic format, at the Debtor's expense, by: (a) 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; (b) telephoning the Claims and Voting Agent at 1-877-476-4389 (toll free); and/or (c) emailing the Claims and Voting Agent at [drcvote@angeiongroup.com](mailto:drcvote@angeiongroup.com).

If a Known Abuse Claimant is represented by counsel, then the Class 3 Solicitation Package shall be distributed to counsel of record. Further, one Solicitation Package (containing unique Ballots) may be distributed to each law firm that is counsel of record for a Known Abuse Claimant, regardless of how many Known Abuse Claimants the law firm represents, unless such counsel requests additional copies as provided in the preceding paragraph. Additionally, counsel for Known Abuse Claimants may request that the Claims and Voting Agent provide, via electronic mail, a link to the E-Balloting Portal along with the unique Ballot identifier for each Known Abuse Claimant represented by such counsel.

Within 72 hours of receipt of the Class 3 Solicitation Package, counsel for a Known Abuse Claimant shall forward the Class 3 Solicitation Package to its Known Abuse Claimant client by first-class mail, postage prepaid, or electronic mail. Within three (3) Business Days after such counsel has forwarded the Class 3 Solicitation Package, counsel shall file a certificate of service attesting that it has done so. The certificate of service shall be filed under seal to protect the confidentiality of the clients' identity. The Plan Proponents shall have standing to seek sanctions against counsel who fail to comply with this requirement and to seek designation of the votes of those Known Abuse Claimants whose counsel failed to comply with this requirement.

Following the Solicitation Deadline, the Claims and Voting Agent will distribute a Class 3 Solicitation Package to a Known Abuse Claimant (or counsel, if applicable) no later than two (2) Business Days (or as soon as reasonably possible) after the Known Abuse Claimant files an Abuse Proof of Claim against an Additional Debtor.<sup>4</sup>

The Claims and Voting Agent is authorized to assist in (a) distributing the Solicitation Packages, (b) receiving, tabulating, and reporting on Ballots cast to accept or reject the Joint Plan by Creditors, (c) responding to inquiries from Creditors and other parties in interest relating to the Disclosure Statement, the Joint Plan, the Ballots, the Solicitation Package, and all other related documents and matters related thereto, including the procedures and requirements for voting to accept or reject the Joint Plan and for objecting to the Joint Plan, (d) soliciting votes on the Joint Plan, and (e) if necessary, contacting Creditors regarding the Joint Plan.

The Plan Proponents will not mail Solicitation Packages or other solicitation materials to Creditors that have already been paid in full during the Chapter 11 Case, or that are authorized to be paid in full in the ordinary course of business pursuant to an order previously entered by this Bankruptcy Court in the Chapter 11 Case.

To avoid duplication and reduce expenses, the Plan Proponents will make every reasonable effort to ensure that any Creditor who has Filed or purchased duplicative Claims against the Debtor or Additional Debtors that are classified under the Joint Plan in the same Voting Class receives no more than one Solicitation Package (and, therefore, one Ballot) on account of such Claim and with respect to that Class as against the Debtor or Additional Debtors.

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<sup>4</sup> A new Solicitation Package need not be distributed to a Known Abuse Claimant to whom a Solicitation Package already was distributed on account of a Previously Asserted Claim.

3. **Confirmation Hearing Notice.** No later than the Solicitation Deadline, the Plan Proponents will serve the Confirmation Hearing Notice, substantially in the form of **Schedule 5** to the Disclosure Statement Order, on all known Creditors and all parties required to be notified under Bankruptcy Rule 2002 (the “**2002 List**”) as of the Voting Record Date (regardless of whether such parties are entitled to vote on the Joint Plan).

4. **Non-Voting Status Notice to Creditors Holding Claims Not Entitled to Vote on the Joint Plan.** Instead of the Solicitation Package, the Plan Proponents will distribute, or cause to be distributed, a notice, substantially in the form of **Schedule 6** to the Disclosure Statement Order (the “**Non-Voting Status Notice**”), to Creditors holding Claims in a Non-Voting Class, holding Unclassified Claims, or holding a Disputed Claim:

Class No. or Plan Section	Description of Claims Not Entitled to Vote
Section 2.1	Administrative Claims
Section 2.3	Administrative Trade Claims
Section 2.4	DIP Credit Card Claim
Section 2.5	Priority Tax Claims
Class 1	Other Priority Claims
Class 2	Secured Claims
Class 5	Non-Insurer Contribution Claims
Class 9	Unsecured Trade Claims—Additional Debtors
Class 10	Additional Debtors’ Non-Trade Unsecured Claims—Additional Debtors

The Plan Proponents are not required to mail Non-Voting Status Notices to the following: (a) Creditors holding Claims that have already been paid in full during the Chapter 11 Case, or that are authorized to be paid in full in the ordinary course of business pursuant to an order previously entered by this Bankruptcy Court; or (b) any party to whom the Scheduling Order was sent, but was subsequently returned as undeliverable without a forwarding address.

5. **Plan Supplements Notice.** The Plan Proponents will send the Plan Supplements Notice, substantially in the form attached to the Disclosure Statement Order as **Schedule 7**, on the date the Plan Proponents file the Plan Supplement(s) or as soon as practicable thereafter.

6. **Notices in Respect of Executory Contracts and Unexpired Leases.** Counterparties to Executory Contracts and Unexpired Leases that receive a notice of assumption (the “**Assumption and Cure Notice**”) or notice of rejection (the “**Rejection Notice**”), substantially in the forms attached as **Schedule 8** and **Schedule 9** to the Disclosure Statement Order, respectively, may File an objection to the Joint Plan’s proposed rejection, assumption, and/or proposed Cure Amount, as applicable. Such objections must be Filed on or before the Confirmation Objection Deadline, as set forth on **Schedule 8** and **Schedule 9**.

## **E. VOTING AND TABULATION PROCEDURES**

1. **Creditors Entitled to Vote.** Only the following Creditors who hold a Claim in the Voting Classes will be entitled to vote with regard to such Claims, as follows:

- a. Creditors who, on or before the Voting Record Date, have Filed a Proof of Claim that (i) has not been expunged, Disallowed, disqualified, withdrawn, or superseded before the Voting Record Date, and (ii) is not the subject of a pending objection, other than a “reduce and allow” objection, Filed with the Bankruptcy Court at least seven days before the Voting Deadline, pending a Resolution Event as provided herein; provided, however, that a Creditor holding a Claim that is the subject of a pending objection on a “reduce and allow” basis will receive a Solicitation Package

and be entitled to vote such Claim in the reduced amount contained in such objection absent further Order of the Bankruptcy Court;

- b. Creditors whose Claims arise (i) pursuant to an agreement or settlement with the Debtor, as reflected in a document Filed with the Bankruptcy Court, (ii) in an Order entered by the Bankruptcy Court, or (iii) in a document executed by the Debtor pursuant to authority granted by the Bankruptcy Court, in each case regardless of whether a Proof of Claim has been Filed;
- c. Creditors who hold any Disputed Claim that has been temporarily Allowed for voting purposes only pursuant to Bankruptcy Rule 3018;
- d. The assignee of any Claim that was transferred on or before the Voting Record Date by any Entity described in subparagraphs (a) through (c) above; provided, however, that such transfer or assignment has been fully effectuated pursuant to the procedures set forth in Bankruptcy Rule 3001(e) and such transfer is reflected on the Claims Register on the Voting Record Date; and
- e. Creditors who have Filed or purchased duplicate Claims within the same Voting Class will be provided with only one Solicitation Package and one Ballot for voting a single Claim in such Class, regardless of whether the Debtor has objected to such duplicate Claims.

2. **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, Distribution, or Settlement Trust Distribution. In tabulating votes, for voting purposes only, the following hierarchy will be used to determine the amount of the Claim associated with each Creditor's vote, as follows:

- a. The Claim amount (i) settled and/or agreed upon by the Debtor and Plan Proponents, as reflected in a document Filed with the Bankruptcy Court, (ii) set forth in an Order of the Bankruptcy Court, or (iii) set forth in a document executed by the Debtor or the Plan Proponents pursuant to authority granted by the Bankruptcy Court;
- b. The Claim amount Allowed (temporarily or otherwise) pursuant to a Resolution Event pursuant to these Procedures;
- c. The Claim amount contained in a Proof of Claim that has been timely Filed by the applicable Claims Bar Date (or deemed timely Filed by the Bankruptcy Court under applicable law), except for any amounts asserted on account of any interest that accrued after the Petition Date; provided, however, that any Ballot cast by a Creditor holding a Claim who timely Filed a Proof of Claim in respect of (i) a Contingent Claim or a Claim in a wholly-unliquidated or unknown amount (based on a reasonable review by the Plan Proponents and/or the Claims and Voting Agent) that is not the subject of an objection will count toward satisfying the numerosity requirement of section 1126(c) of the Bankruptcy Code, and will count as a Ballot for a Claim in the amount of one dollar (\$1.00) solely for the purposes of satisfying the dollar amount provisions of section 1126(c) of the Bankruptcy Code, and (ii) a partially liquidated and partially unliquidated Claim, which Claim will be Allowed for voting purposes only in the liquidated amount;
- d. Each Known Abuse Claim will vote at one dollar (\$1.00) solely for the purposes of satisfying the dollar amount provisions of section 1126(c) of the Bankruptcy Code;

- e. Each Unknown Abuse Claim (represented by the Unknown Abuse Claims Representative) will vote at one dollar (\$1.00) solely for the purposes of satisfying the dollar amount provisions of section 1126(c) of the Bankruptcy Code;
- f. A Claim listed in the Schedules as Contingent, Disputed, or unliquidated will vote at one dollar (\$1.00) solely for the purposes of satisfying the dollar amount provisions of section 1126(c) of the Bankruptcy Code, provided such Claim is not superseded by a timely Filed Proof of Claim; and
- h. In the absence of any of the foregoing, such Claim will be Disallowed for voting purposes.

3. **Resolution of Disputed Claims for Voting Purposes; Resolution Event.**

- a. Absent a further Order of the Bankruptcy Court, if any Plan Proponent Files, on or before fifteen (15) days before the Voting Deadline, an objection to a Claim in a Voting Class on a “reduce and allow” basis, the Creditor holding such a Claim will be entitled to vote such Claim in the reduced amount contained in such objection.
- b. Absent a further Order of the Bankruptcy Court, if any Plan Proponent Files, on or before fifteen (15) days before the Voting Deadline, an objection to a Claim in a Voting Class *other than* on a “reduce and allow” basis: (i) the filing Plan Proponent will cause the applicable Creditor to be served with both (A) a Non-Voting Status Notice and (B) a Confirmation Hearing Notice; and (ii) the applicable Creditor will not be entitled to vote to accept or reject the Joint Plan on account of such Claim unless a Resolution Event (as defined below) occurs.
- c. A “**Resolution Event**” means the occurrence of one or more of the following events no later than two (2) Business Days before the Voting Deadline:
  - i. An Order of the Bankruptcy Court is entered allowing such Claim pursuant to section 502(b) of the Bankruptcy Code, after notice and a hearing;
  - ii. An Order of the Bankruptcy Court is entered temporarily allowing such Claim for voting purposes only pursuant to Bankruptcy Rule 3018(a), after notice and a hearing;
  - iii. A stipulation or other agreement is executed between the Creditor holding such Claim and the applicable Plan Proponent resolving the objection and allowing such Claim in an agreed upon amount; or
  - iv. The pending objection is voluntarily withdrawn by the objecting party.
- d. No later than one (1) Business Day (or as soon as reasonably possible) following the occurrence of a Resolution Event, the Debtor will cause the Claims and Voting Agent to distribute, via email, hand delivery, or overnight courier service a Solicitation Package and a pre-addressed, postage pre-paid envelope to the relevant Creditor to the extent such Creditor has not already received a Solicitation Package containing a Ballot.

4. **Ballot Tabulation Procedures.** The following voting procedures and standard assumptions will be used in tabulating Ballots, subject to the Plan Proponents’ right to waive any of the below specified requirements for completion and submission of Ballots so long as such requirement is not otherwise required by the Bankruptcy Code, Bankruptcy Rules, Local Rules, or Complex Case Procedures:

### Voting Instructions

- a. Ballots must be delivered to the Claims and Voting Agent in accordance with the instructions set forth in the applicable Ballot.
- b. To be counted, Ballots must be completed, signed, dated, and returned using one of the applicable delivery methods set forth in the Ballot. A Ballot submitted by the E-Balloting Portal (if applicable) shall be deemed to bear an original signature.
- c. Unless the Ballot being furnished is timely submitted on or before October 29, 2025, at 11:59 p.m. Central Time (or as the same may be extended, in writing, by the Plan Proponents), the Plan Proponents will reject such Ballot as invalid and, therefore, will not count it in connection with Confirmation of the Joint Plan.
- d. The Debtor will File with the Bankruptcy Court on or before November 6, 2025, a voting report (the “**Voting Report**”). Among other things, the Voting Report will delineate every Ballot that does not conform to the voting instructions or that contains any form of irregularity including, but not limited to, those Ballots that are late or (in whole or in material part) illegible, unidentifiable, lacking signatures or lacking necessary information, received via facsimile or any other electronic means (other than the E-Balloting Portal for Claims in Classes 3, 4, 7, and 8 or email for Claims in Class 6), or damaged (collectively, in each case, the “**Irregular Ballots**”). The Voting Report will indicate the Plan Proponents’ intentions regarding each Irregular Ballot.
- e. The method of delivery of Ballots to the Claims and Voting Agent is at the election and risk of each Creditor. Except as otherwise provided in the Ballot, such delivery will be deemed made only when the Claims and Voting Agent **actually receives** the originally executed Ballot or the E-Ballot (if applicable) is submitted through the E-Balloting Portal. Instead of effecting delivery by first-class mail, it is recommended, though not required, that Creditors use an overnight or hand delivery service if not using the E-Balloting Portal. In all cases, Creditors should allow sufficient time to assure timely delivery.
- f. An executed Ballot is required to be submitted by the Entity submitting such Ballot.
- g. Delivery of a Ballot to the Claims and Voting Agent by facsimile, electronic email, or any electronic means (other than the E-Balloting Portal for Claims in Classes 3, 4, 7, and 8 or email for Claims in Class 6), will not be valid.
- h. No Ballot should be sent to any Plan Proponent, the Plan Proponents’ agents (other than the Claims and Voting Agent), or the Plan Proponents’ financial or legal advisors, and, if so sent, will not be counted.
- i. If multiple Ballots are received from the same Creditor with respect to the same Claim before the Voting Deadline, the last properly executed Ballot timely received will be deemed to reflect that voter’s intent and will supersede and revoke any prior received Ballot.
- j. Creditors must vote all of their Claims within a particular Class either to accept or reject the Joint Plan, and may not split any votes. Accordingly, a Ballot that attempts to partially reject and partially accept the Joint Plan will not be counted.
- k. A person signing a Ballot in its capacity as a trustee, executor, administrator, guardian, attorney-in-fact, officer of a corporation, or otherwise acting in a fiduciary or representative capacity of a Creditor must indicate such capacity when signing.

For the avoidance of doubt, a Ballot submitted by the E-Balloting Portal (if applicable) shall be deemed to bear an original signature.

- l. If a Claim has been estimated or otherwise Allowed only for voting purposes by Order of the Bankruptcy Court, such Claim will be temporarily Allowed in the amount so estimated or Allowed by the Bankruptcy Court for voting purposes only, and not for purposes of Allowance or Distribution.
- m. After the Voting Deadline, no Ballot may be withdrawn or modified without the prior written consent of the Plan Proponents.
- n. The Ballot does not constitute, and will not be deemed to be, (a) a Proof of Claim, or (b) an assertion or admission of a Claim.
- o. To the extent that an instruction herein conflicts with an instruction set forth in a Ballot, the instruction in the applicable Ballot shall control.

#### Other Voting Procedures

- p. Subject to a contrary Order of the Bankruptcy Court, the Plan Proponents may waive any defects or irregularities as to any particular Irregular Ballot at any time, either before or after the close of voting, and any such waivers will be documented in the Voting Report.
- q. No Entity will be under any duty to provide notification of defects or irregularities with respect to delivered Ballots other than as provided in the Voting Report nor will any Entity incur any liability for failure to provide such notification.
- r. Unless waived by the Plan Proponents or as ordered by the Bankruptcy Court, any defects or irregularities in connection with deliveries of Ballots must be cured before the Voting Deadline or such Ballots will not be counted.
- s. Subject to any Order of the Bankruptcy Court, the Plan Proponents reserve the right to reject any Ballots not in proper form, the acceptance of which, in the opinion of the Plan Proponents, would not be in accordance with the provisions of the Bankruptcy Code or the Bankruptcy Rules; provided, however, any such rejections will be documented in the Voting Report.
- t. If an objection to a Claim is Filed, such Claim will be treated in accordance with these Procedures.
- u. The following Ballots will not be counted in determining the acceptance or rejection of the Joint Plan: (i) any Ballot that is illegible or contains insufficient information to permit the identification of the Creditor holding such Claim; (ii) any Ballot cast by any Entity that does not hold a Claim in a Voting Class; (iii) any Ballot lacking a signature; (iv) any Ballot not marked to accept or reject the Joint Plan or marked both to accept and reject the Joint Plan; and (v) any Ballot submitted by any Entity not entitled to vote pursuant to the Procedures.
- v. The Plan Proponents are authorized to stipulate with the Creditor that establishes the amount of such Creditor's Claim for voting purposes.
- w. Where any portion of a single Claim has been transferred to a transferee, all Creditors holding any portion of such single Claim will be (a) treated as a single creditor and (b) required to vote every portion of such Claim collectively to accept or reject the Joint Plan. If (a) a Ballot, (b) a group of Ballots within a Voting Class received from a single Creditor, or (c) a group of Ballots received from the various



Creditors holding multiple portions of a single Claim partially reject and partially accept the Joint Plan, such Ballots will not be counted.

- x. No fees, commissions, or other remuneration will be payable to any broker, dealer, or other person for soliciting Ballots to accept the Joint Plan.
- y. The Ballot is not a letter of transmittal and may not be used for any purpose other than to vote to accept or reject the Joint Plan. Accordingly, at this time, Creditors holding Claims should not surrender certificates or instruments representing or evidencing their Claims, and neither the Debtor nor the Claims and Voting Agent will accept delivery of any such certificates or instruments surrendered together with a Ballot.

#### **F. NON-SUBSTANTIVE MODIFICATIONS**

The Plan Proponents reserve the right, before distribution, to make non-substantive or immaterial changes to the Disclosure Statement, Joint Plan, Solicitation Packages, Ballots, the Archdiocese Support Letter, the Survivors' Committee Letter, these Procedures, Confirmation Hearing Notice, Non-Voting Status Notice, Plan Supplements Notice, Assumption and Cure and Rejection Notices, and related documents without further order of the Bankruptcy Court, including changes to correct typographical and grammatical errors, if any, and to make conforming changes to the Disclosure Statement, the Joint Plan, and any other materials in the Solicitation Package.

*[Signature Page Follows]*

Dated: August 14, 2025

/s/ Mark A. Mintz

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