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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

In re	Case No. 24-21326
THE ROMAN CATHOLIC BISHOP OF SACRAMENTO,	Chapter 11
	DCN: FWP-19
Debtor in Possession.	Date: July 9, 2024 Time: 10:00 a.m. Location: Dept. C – Courtroom 35 Judge: Hon. Christopher M. Klein

**ORDER: (1) FIXING TIME FOR FILING PROOFS OF CLAIM; (2) APPROVING
PROOF OF CLAIM FORMS; (3) PROVIDING CONFIDENTIAL PROTOCOLS; AND
(4) APPROVING FORM AND MANNER OF NOTICE**

1 On July 9, 2024 at 10:00 a.m., the Court held a hearing, on regular notice, on the *Debtor's*
2 *Motion for Order: (1) Fixing Time for Filing Proofs of Claim; (2) Approving Proof of Claim Forms;*
3 *(3) Providing Confidential Protocols; and (4) Approving Form and Manner of Notice* ECF No. 362
4 (the "Motion")¹ filed by The Roman Catholic Bishop of Sacramento, the debtor and debtor in
5 possession in the above-captioned case (the "RCBS" or the "Debtor"). The Debtor appeared through
6 its counsel, Paul J. Pascuzzi. All other appearances were noted on the record.

7 The Court having reviewed and considered the Motion, the arguments of counsel at the
8 hearing; and the Court finding good cause to grant the relief requested by the Motion under
9 Bankruptcy Code sections 501, 502, and 503, Bankruptcy Rules 2002, 3001-3005 and 9008 and
10 Local Bankruptcy Rule 3003-1; the Court further finding that notice given of the Motion was
11 appropriate under the circumstances;

12 IT IS HEREBY ORDERED as follows:

- 13 1. The Motion is granted, as set forth herein.
- 14 2. The General Proof of Claim Form, the Confidential Survivor Proof of Claim
15 (including the Confidential Survivor Proof of Claim Form and separate optional Confidential
16 Survivor Supplement), the Confidentiality Agreement, the Notice of Bar Date for General Proofs
17 of Claim, the Notice of Bar Date for Survivor Proofs of Claim and the Publication Notice,
18 substantially in the forms attached hereto as *Exhibits A, B, C, D, E, and F*, respectively, and the
19 manner of providing notice of the Bar Date proposed in the Motion, are approved in all respects
20 under Bankruptcy Rules 2002, 3003 and 9008 and Local Bankruptcy Rule 3003-1. The form and
21 manner of notice of the Bar Date approved by this Order (the "Bar Date Order") are deemed to
22 fulfill the notice requirements of the Bankruptcy Rules and the Bankruptcy Local Rules, and notice
23 of the Bar Date in the form and manner proposed by the Debtor is fair and reasonable and will
24 provide good, sufficient, and due notice to all creditors and interest holders of their rights and
25 obligations in connection with claims they may assert against the Debtor's estate in this chapter 11
26

27 _____
28 ¹ Terms not otherwise defined in this Bar Date Order shall have the same meanings ascribed to them in the Motion.

1 case. Accordingly, the Debtor is authorized to serve and publish the Bar Date Notices in the manner
2 described in this Bar Date Order.

3 3. Except as provided in paragraph 6 of this Bar Date Order, any person or entity
4 holding a prepetition claim against the Debtor must file a proof of claim in accordance with the
5 procedures described herein on or before October 1, 2024 (the “Bar Date”). The Bar Date applies
6 to all persons and entities holding claims, including section 503(b)(9) claims, against the Debtor
7 (whether secured, unsecured priority, or unsecured nonpriority) that arose prior to or on April 1,
8 2024 (the “Petition Date”).

9 4. Except as provided in paragraph 6 of this Bar Date Order, in accordance with
10 Bankruptcy Code section 502(b)(9), any governmental unit holding a prepetition claim against the
11 Debtor must file a proof of claim in accordance with the procedures described herein on or before
12 the Bar Date, including governmental units holding claims against the Debtor for unpaid taxes,
13 whether such claims arise from prepetition tax years or periods or prepetition transactions to which
14 the Debtor was a party.²

15 5. Except as provided in paragraph 6 of this Bar Date Order, any person or entity
16 holding a prepetition claim arising from Abuse (defined below) for which the individual believes
17 the Debtor may be liable, must file a Confidential Survivor Proof of Claim Form and may file the
18 separate optional Confidential Survivor Supplement in accordance with the procedures described
19 in this Bar Date Order on or before October 1, 2024. For purposes of this Bar Date Order:

20 (a) “Abuse” means conduct giving rise to a Survivor Claim.

21 (b) A “Survivor Claim” is defined as any Claim (as defined in Bankruptcy Code
22 section 101(5)) against the Diocese resulting or arising or related to in whole
23 or in part, directly or indirectly from any actual or alleged sexual conduct or
24 misconduct, grooming, sexual abuse or molestation, indecent assault and/or
25 battery, rape, pedophilia, ephebophilia, or sexually-related physical,
26 psychological, or emotional harm, or contacts, or interactions of a sexual
27 nature between a child and an adult, or a nonconsenting adult and another
adult, sexual assault, sexual battery, sexual psychological or emotional abuse,
humiliation, intimidation, any other conduct constituting a sexual offense, or
any other sexual misconduct, and seeking monetary damages or any other
relief based upon the conduct described above, under any theory of liability,
including, but not limited to, vicarious liability, any negligence-based theory,

28 ² As used herein, the term “government unit” has the meaning given to it in Bankruptcy Code section 101(27).

1 conspiracy, fraudulent concealment, intentional tort, continuing tort, public
2 nuisance, invasion of privacy, breach of alleged duties imposed by The
3 Charter for the Protection of Children and Young People, Canon Law or other
4 Catholic Church documents or principles, contribution, indemnity, or any
5 other theory based on any acts or failures to act by the Diocese or any other
6 person or entity for whose acts or failures to act the Diocese is or may be
7 responsible, including but not limited to, claims against clergy, deacons,
8 seminarians, employees, teachers, or volunteers. Survivor Claim includes all
9 claims for Childhood Sexual Assaults, as that term is defined by California
10 Code of Civil Procedure section 340.1(c).

- 11 (c) A “Survivor Claimant” is a person asserting a Survivor Claim against the
12 Diocese, or if a minor or legally incapacitated adult, then his/her parent or
13 legal guardian or custodian.

14 6. The following entities whose claims otherwise would be subject to the Bar Date shall
15 not be required to file proofs of claim in this chapter 11 case:

- 16 (a) Any person or entity that as of the entry of this Bar Date Order has already
17 properly filed a proof of claim against the Debtor with the Clerk of the Court
18 for the United States Bankruptcy Court for the Eastern District of California
19 or with Donlin, Recano & Company, Inc.
- 20 (b) Any person or entity: (i) whose claim is listed in the Schedules or any
21 amendments thereto, and (ii) whose claim is not described therein as
22 “disputed,” “contingent,” or “unliquidated,” and (iii) that does not dispute the
23 amount or classification of its claim as set forth in the Schedules;
- 24 (c) Professionals retained pursuant to orders of this Court who assert
25 administrative claims for payment of fees and expenses subject to the Court’s
26 approval under Bankruptcy Code sections 330, 331(a) and 503(b);
- 27 (d) Any person or entity that asserts an administrative expense claim against the
28 Debtor under Bankruptcy Code sections 503(b)(1) through (8);
- (e) Any person or entity whose claim against the Debtor has been allowed by an
order of the Court entered on or before the Bar Date;
- (f) Any person or entity whose claim has been paid in full;
- (g) Any holder of a Claim for which a separate deadline is (or has been) fixed by
the Court; and
- (h) The United States Trustee regarding a claim for quarterly fees under 28
U.S.C. § 1930(a)(6).

7. The Debtor shall retain the right to: (i) dispute, or assert offsets or defenses against,
any filed claim or any claim listed or reflected in the Schedules as to nature, amount, liability,

1 classification or otherwise; and (ii) subsequently designate any claim as disputed, contingent or
2 unliquidated.

3 8. Subject to the provisions of paragraph 6 of this Bar Date Order, the following entities
4 must file a proof of claim on or before the Bar Date:

- 5 (a) Any entity or person whose prepetition claim against the Debtor is not listed
6 in the Debtor's Schedules or whose prepetition claim is listed in the
7 Schedules but is listed as disputed, contingent or unliquidated and that desires
8 to participate in this chapter 11 case or share in any distribution in this chapter
9 11 case;
- 10 (b) Any entity or person that believes that its prepetition claim is improperly
11 classified in the Schedules or is listed in an incorrect amount and that desires
12 to have its claim allowed in a classification or amount other than that
13 identified in the Schedules; and
- 14 (c) Any person who believes that he or she has or may have a Survivor Claim for
15 which the person believes the Debtor may be liable.

16 9. Pursuant to Bankruptcy Rule 3003(c)(2), **any entity that is required to file a proof
17 of claim in this chapter 11 case pursuant to the Bankruptcy Code, the Bankruptcy Rules or
18 this Bar Date Order with respect to a particular claim against the Debtor, but that fails to do
19 so by the Bar Date, may NOT be treated as a creditor with respect to such claim for the
20 purposes of voting on and distribution under any chapter 11 plan proposed and/or confirmed
21 in this case.**

22 10. Within ten business days of the entry of this Bar Date Order, and except as provided
23 in paragraph 11 below concerning Survivor Claims, the Debtor shall serve by United States mail,
24 first-class postage prepaid upon: (a) all known entities holding potential prepetition claims against
25 the Debtor, and their counsel (if known); (b) all parties that have requested special notice in this
26 case; and (c) the United States Trustee, the following documents: (i) Notice of Bar Date for General
27 Proofs of Claim substantially in the form attached as *Exhibit D* to this Bar Date Order; and (ii) a
28 copy of the General Proof of Claim Form substantially in the form attached as *Exhibit A* to this
Bar Date Order.

11. Within ten business days of the entry of this Bar Date Order, the Debtor shall serve
by United States mail, first-class postage prepaid: (i) the Notice of Bar Date for Survivor Proofs of

1 Claim substantially in the form attached as **Exhibit E** to this Bar Date Order, and (ii) a copy of the
 2 Confidential Survivor Proof of Claim (including the Confidential Survivor Proof of Claim Form
 3 and optional Confidential Survivor Supplement) upon all known Survivor Claimants and their
 4 counsel (if known)³ substantially in the form attached as **Exhibit B** to this Bar Date Order.

5 12. The Debtor also shall make the Bar Date Notices available to the public in the
 6 following manner:

7 (a) The Debtor shall post on the home page of the RCBS's website a copy of the
 8 Notice of Bar Date for General Proofs of Claim and General Proof of Claim
 9 Form as well as a copy of the Notice of Bar Date for Survivor Proofs of Claim
 10 and the Confidential Survivor Proof of Claim. The Debtor's Claims Agent
 11 shall also post these forms on its website established for this bankruptcy case.
 12 The Debtor shall promptly request Survivors Network of those Abused by
 13 Priests, a survivor advocacy group, and BishopAccountability.org, Inc., to post
 14 the Notice of Bar Date for Survivor Proofs of Claim on the website on their
 15 respective websites.

16 (b) The Debtor shall cause a copy of the notice substantially in the form attached
 17 as **Exhibit F** to this Bar Date Order (the "Publication Notice"), in proportion
 18 approximately a 1/8-page advertisement in each newspaper listed in (i)
 19 through (iv) below, to be published as follows:

20 (i) Once, in English, in the Western edition of *The Wall Street Journal*,
 21 and once, in English, in the Los Angeles, San Francisco and Phoenix
 22 region edition of *USA Today*, on the first available, reasonably
 23 practical date after entry of the Bar Date Order;

24 (ii) Twice each, in English, in the following newspapers, first on the first
 25 available, reasonably practical date after entry of the Bar Date Order
 26 and second, approximately one month prior to the expiration of the
 Bar Date:

<i>Ledger Dispatch</i>	(Amador County);
<i>Sacramento Bee</i>	(Sacramento and Yolo Counties);
<i>Vacaville Reporter</i>	(Solano County);
<i>Mountain Democrat</i>	(El Dorado County);
<i>Placer Herald</i>	(Placer County);
<i>Appeal Democrat</i>	(Sutter and Yuba Counties);
<i>The Union</i>	(Nevada County);
<i>Mountain Messenger</i>	(Sierra, Lassen, Plumas Counties);
<i>Tri-County News</i>	(Colusa and Glenn Counties);

27 ³ If a Survivor Claimant's counsel has appeared in the bankruptcy case on behalf of a Survivor
 28 Claimant or provided written consent to Debtor's counsel, the Debtor is authorized to serve the
 Survivor Claimant's counsel with the Notice of Bar Date for Survivor Proofs of Claim.

<i>Chico Enterprise-Record</i>	(Butte County);
<i>Red Bluff Daily News</i>	(Tehama County);
<i>Redding Record Searchlight</i>	(Shasta County);
<i>Siskiyou Daily News</i>	(Siskiyou County);
<i>Trinity Journal</i>	(Trinity County);
<i>Modoc County Record</i>	(Modoc County);
<i>Reno Gazette</i>	(Washoe County, NV);
<i>Stockton Record</i>	(San Joaquin County);
<i>Davis Enterprise</i>	(Yolo County);
<i>Los Angeles Times</i>	(Los Angeles County);
<i>San Francisco Chronicle</i>	(San Francisco County);
<i>San Jose Mercury News</i>	(Santa Clara County); and
<i>Santa Rosa Press Democrat</i>	(Sonoma County).

(iii) Twice each, in Spanish, in the *La Opinion de la Bahia* (published weekly), *La Prensa Sonoma* (published monthly), and *Latino Times* (published monthly), first on the first available, reasonably practical date after entry of the Bar Date Order and second, approximately one month prior to the expiration of the Bar Date, if such papers allow for this publication schedule.

13. Additionally, the Debtor shall provide further notice of the Bar Date by taking the following measures:

(a) The Debtor will request that each Parish include in the bulletins produced by the Parishes and missions located within the geographic territory of the Diocese, bi-weekly from the first reasonably available date after entry of the Bar Date Order until the Bar Date, an announcement that will be placed in the language in which such Parish or mission conducts Mass (English or Spanish).

14. Additionally, the Debtor shall provide further notice of the Bar Date by taking the following measures:

(a) The Debtor will publish the Publication Notice in its own written magazine publication called the Catholic Herald Magazine.

(b) The Debtor will request each Parish and mission in the Diocese to post a flyer announcing the Bar Date in a prominent location for at least six weeks prior to the Bar Date.

(c) The Debtor will post the Bar Date and information on how to obtain and submit a Confidential Survivor Proof of Claim at least once a week for the six weeks prior to Bar Date on the following social media accounts:

- (1) <https://www.instagram.com/diocesesacramento/>
- (2) <https://www.facebook.com/DioceseSacramento/>

1 15. The Debtor is authorized, under Bankruptcy Code section 503(b) to pay the costs of
2 mailing and publication as described in the Motion.

3 16. All Confidential Survivor Proofs of Claim (including the Confidential Survivor Proof
4 of Claim Form and optional Confidential Survivor Supplement) shall be treated as confidential in
5 accordance with the following confidentiality protocols:

- 6 (a) Potential Survivor Claimants are directed not to file a Confidential Survivor
7 Proof of Claim with the Court. Instead, all Confidential Survivor Proofs of
8 Claim are directed to be sent to the Claims Agent in accordance with the
9 procedures set forth in the Notice of Bar Date for Survivor Proofs of Claim.
10 Any claim that appears to be a Survivor Claim that is filed without an
11 Optional Confidential Survivor Supplement or filed using the General Proof
12 of Claim Form shall be treated by the Claims Agent as a confidential claim
13 pending resolution of the claimant's intent regarding confidential treatment
14 of such claim.
- 15 (b) Confidential Survivor Proofs of Claim submitted by Survivor Claimants will
16 not be available to the general public. The Confidentiality Protocol is for the
17 benefit of the Survivor Claimants. Accordingly, a Survivor Claimant may
18 elect to make any of the information contained in his or her own Confidential
19 Survivor Proof of Claim public; provided, however, that notwithstanding that
20 a Survivor Claimant may disclose information on such claimant's
21 Confidential Survivor Proof of Claim, such disclosure shall not constitute a
22 waiver of confidentiality and no other party may disclose any information
23 from such Confidential Survivor Proof of Claim, except as allowed by
24 Permitted Parties, as defined below.
- 25 (c) Confidential Survivor Proofs of Claim submitted by a Survivor Claimant
26 shall be held and treated as confidential by the Debtor and the Debtor's
27 professionals and copies thereof shall be provided by the Debtor's Claims
28 Agent or other professionals to the parties listed below (the "Permitted
Parties") and to such other persons that may be granted access to the
Confidential Survivor Proofs of Claim by order of the Court. No party
(including a Permitted Party) may obtain copies of Confidential Survivor
Proofs of Claim unless such party first executes a confidentiality agreement
substantially in the form attached hereto as **Exhibit C** (the "Confidentiality
Agreement").⁴ Executed Confidentiality Agreements shall be provided to
counsel to the Debtor, Insurers, reinsurers of the Debtor, and any successor
third-party administrator of the Debtor's insurance program, and counsel to

⁴ Notwithstanding paragraph 16(c), the U.S. Trustee shall have full access to the Confidential Survivor Proofs of Claim without executing a Confidentiality Agreement. All Confidential Survivor Proofs of Claim and Confidential Information shall be treated as "Records," as that term is defined and used in the Privacy Act. See, 5 U.S.C. § 552a(a)(4).

1 the Committee; provided however, that executed Confidentiality Agreements
2 for Permitted Parties retained by or on behalf of the Debtor's insurers shall
3 be maintained by counsel to such insurers and need not be provided to the
4 Committee or the Debtor absent Court approval upon a showing of good
5 cause. Counsel of record in the above captioned case to any Permitted Parties
6 shall keep confidential and not disclose the contents of any Confidential
7 Survivor Proof of Claim (including the Confidential Survivor Proof of Claim
8 Form and optional Confidential Survivor Supplement) except as otherwise
9 provided by the confidentiality provision herein or order of the Court. Each
10 Permitted Party (as defined below in ¶16(d)(1)-(11)) together with their
11 respective successors, regulators, reinsurers, administrators and counsel,
12 shall only be required to execute a single Confidentiality Agreement on
13 behalf of those entities and their respective clients, which shall be deemed
14 binding on their entire firm or entity and their respective clients, and the
15 employees, partners, officers and directors of the foregoing. Unless
16 otherwise ordered by the Court, access to the Confidential Survivor Proof of
17 Claim (including the Confidential Survivor Proof of Claim Form and optional
18 Confidential Survivor Supplement), and the Confidential Information⁵ for all
19 other Permitted Parties (identified below in ¶16(d) (12)), shall be restricted
20 to the natural person who executes a Confidential Agreement, and a separate
21 Confidentiality Agreement must be signed by each natural person seeking
22 access to the Conditional Survivor Proof of Claim (including the Confidential
23 Survivor Proof of Claim Form and optional Confidential Survivor
24 Supplement) on behalf of a Permitted Party.

15 (d) The Permitted Parties (the "Permitted Party List") are:

- 16 (1) Counsel and other professionals for the Debtor retained pursuant to
17 an order of the Bankruptcy Court, including partners, counsel,
18 associates, and employees of such professionals, who are necessary
19 to assist the Debtor in reviewing and analyzing the Survivor Claims;
20 (2) The Bishop of the Debtor and employees of the Debtor who are
21 necessary to assist the Bishop in reviewing and analyzing the Survivor
22 Claims, except that no individual accused of committing abuse in a
23 lawsuit or Survivor Claim shall have access to any Confidential
24 Survivor Proof of Claim Form or Confidential Survivor Supplement;
25 (3) Counsel and other professionals for the Committee retained pursuant
26 to an order of the Court, including partners, counsel, associates, and
27

25 ⁵ "Confidential Information" means any information contained in a Confidential Survivor
26 Proof of Claim except to the extent the (1) information was known to the Permitted Party prior to
27 being disclosed in the Proof of Claim, or (2) becomes generally available to the public through no
28 act or failure on the part of the Permitted Party, (3) is obtained from a third party under no obligation
to maintain its confidentiality, or (4) is developed by the Permitted Party independently without
reference to any Confidential Survivor Proof of Claim.

employees of such professionals, who are necessary to assist the Committee in reviewing and analyzing the Survivor Claims;

- (4) Insurers for the Debtor, together with their successors, administrators, retrocessionaires, reinsurers, reinsurance intermediaries, and their counsel and other professionals, including partners, counsel, associates, consultants, experts, and employees of such professionals, who are necessary to assist the foregoing in reviewing and analyzing Survivor Claims;
- (5) Any unknown claims representative appointed pursuant to an order of the Court in this case;
- (6) Any mediator appointed pursuant to an order of this Court to mediate the terms of a settlement or Plan of reorganization in this case;
- (7) Any special arbitrator/claims reviewer appointed pursuant to an order of this Court to review and resolve the claims of Survivor Claimants;
- (8) Any trustee, or functional equivalent thereof, appointed to administer payments to Survivor Claimants including pursuant to a plan of reorganization or a proposed plan of reorganization;
- (9) Members of the Committee and their personal counsel;
- (10) Any party that is included in a mediation in this bankruptcy case as determined by a court appointed mediator;
- (11) Persons who, in addition to those identified above, are permitted access upon stipulation of the party that produced or disclosed the affected Survivor Claim, after notice has been given to counsel to the Debtor, Committee, and Insurers, and each has had a reasonable opportunity to object; and
- (12) Such other persons as the Court determines should have the information in order to evaluate Survivor Claims; provided, however, that any such determination shall be made on no less than seven days' notice to the Committee and affected Survivor Claimants.

17. For any proof of claim to be validly and properly filed, a completed and signed original⁶ proof of claim form (Bankruptcy Form 410), together with any accompanying

⁶ Any proof of claim may be signed using an electronic signature, including without limitation, any software with electronic signature capabilities, such as DocuSign, AdobeSign, VineSign, or similar, reliable program. A proof of claim may also be submitted using an /s/ followed by the

1 documentation required by Bankruptcy Rules 3001(c) and 3001(d), must be delivered to Donlin,
2 Recano & Company, Inc., the Debtor's claims agent (the "Claims Agent"), at the address identified
3 on the applicable Bar Date Notice or electronically filed with the Claims Agent so as to be received
4 by the date as stated on the applicable Bar Date Notice; provided, however, that if the supporting
5 documentation for a General Proof of Claim is voluminous, such General Proof of Claim may
6 include a summary of such documentation or an explanation as to why such documentation is not
7 available, in accordance with Bankruptcy Rules 3001(c) and 3001(d) and/or other applicable law.
8 Proofs of claim may be submitted in person or by courier service, hand delivery or U.S. Mail, or
9 electronically. Proofs of claim submitted by facsimile or e-mail shall not be accepted. Proofs of
10 claim shall be deemed filed when actually received by the Claims Processing Agent by the Bar
11 Date. If a creditor desires to receive acknowledgement of receipt of a proof of claim, the creditor
12 also must submit to the Claims Agent by the Bar Date and concurrently with submitting its original
13 proof of claim: (i) a third copy of the original proof of claim; and (ii) a self-addressed, stamped
14 return envelope.

15 18. The Debtor is authorized and empowered to take all actions necessary to implement
16 and enforce the relief granted in this Bar Date Order. Nothing herein prohibits the Committee or
17 any counsel for an individual claimant from enforcing this Bar Date Order with respect to the
18 confidentiality provisions contained herein and all parties rights are reserved as to any such request.

19 19. Nothing contained herein shall constitute a waiver by the Debtor of (a) any defenses
20 in connection with any general claims or Survivor Claims that are asserted against the Debtor, or
21 (b) the right to assert that any general claims or Survivor Claims are barred by applicable statutes
22 of limitations.

23 20. This Bar Date Order is without prejudice to any request by the Debtor, Committee
24 or Unknown Claims Representative to modify the Bar Date.


25
26 _____
27 claimant's typed name, provided the person authorized by the claimant to submit his/her proof of
28 claim maintains an original copy of the claimant's "wet" signature or a writing provided by the
claimant authorizing the use of such electronic signature and such signature shall be deemed signed
by the creditor as provided in Local Rule 9004-1(c)(2).

1 21. Under Bankruptcy Rule 3002(c)(4), any claim arising from the rejection of an
2 executory contract or unexpired lease of the Debtor shall be filed within 30 days after such
3 rejection.

4 22. This Court shall retain jurisdiction over any and all matters arising from or relating
5 to the implementation, interpretation, enforcement or modification of this Bar Date Order.

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7 Dated: July 16, 2024

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United States Bankruptcy Judge

APPROVED AS TO FORM

STINSON LLP
KELLER BENVENUTTI KIM LLP

By: /s/ Robert T. Kugler
Robert T. Kugler
Attorneys for the Official
Committee of Unsecured Creditors

DUANE MORRIS LLP

By: /s/ Timothy W. Evanston
Timothy W. Evanston
Attorneys for Certain Underwriters at Lloyd's
London and certain London Market Companies

Exhibit A
(General Proof of Claim Form)

Fill in this information to identify the case:

Debtor 1 The Roman Catholic Bishop of SacramentoDebtor 2
(Spouse, if filing) _____United States Bankruptcy Court for the: Eastern District of CaliforniaCase number 24-21326

THIS PROOF OF CLAIM FORM SHOULD NOT BE FILED OR SUBMITTED BY PARTIES ASSERTING A SURVIVOR CLAIM. SURVIVOR CLAIMANTS SHOULD USE THE CONFIDENTIAL SURVIVOR PROOF OF CLAIM AVAILABLE AT [HTTPS://WWW.DONLINRECANO.COM/CLIENTS/RCBS/STATIC/SURVIVORCLAIMS](https://www.donlinrecano.com/clients/rcbs/static/survivorclaims)

Official Form 410

Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim**1. Who is the current creditor?**

Name of the current creditor (the person or entity to be paid for this claim) _____

Other names the creditor used with the debtor _____

2. Has this claim been acquired from someone else?☐ No☐ Yes. From whom? _____**3. Where should notices and payments to the creditor be sent?**

Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

Where should notices to the creditor be sent?

Name _____

Number _____ Street _____

City _____ State _____ ZIP Code _____

Contact phone _____

Contact email _____

Where should payments to the creditor be sent? (if different)

Name _____

Number _____ Street _____

City _____ State _____ ZIP Code _____

Contact phone _____

Contact email _____

Uniform claim identifier for electronic payments in chapter 13 (if you use one):
_____**4. Does this claim amend one already filed?**☐ No☐ Yes. Claim number on court claims registry (if known) _____

Filed on _____

MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?☐ No☐ Yes. Who made the earlier filing? _____

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor? ☐ No
☐ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____

7. How much is the claim? \$ _____. Does this amount include interest or other charges?
☐ No
☐ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.
Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).
Limit disclosing information that is entitled to privacy, such as health care information.
- _____

9. Is all or part of the claim secured? ☐ No
☐ Yes. The claim is secured by a lien on property.
- Nature of property:**
☐ Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.
☐ Motor vehicle
☐ Other. Describe: _____
- Basis for perfection:** _____
Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)
- Value of property:** \$ _____
Amount of the claim that is secured: \$ _____
Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)
- Amount necessary to cure any default as of the date of the petition:** \$ _____
- Annual Interest Rate** (when case was filed) _____ %
☐ Fixed
☐ Variable

10. Is this claim based on a lease? ☐ No
☐ Yes. Amount necessary to cure any default as of the date of the petition. \$ _____

11. Is this claim subject to a right of setoff? ☐ No
☐ Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☐ No

☐ Yes. Check one:

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

☐ Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

☐ Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

☐ Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

Amount entitled to priority

\$

\$

\$

\$

\$

\$

* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☐ I am the creditor.

☐ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date

MM / DD / YYYY

Signature

Print the name of the person who is completing and signing this claim:

Name

First name

Middle name

Last name

Title

Company

Identify the corporate servicer as the company if the authorized agent is a servicer.

Address

Number

Street

City

State

ZIP Code

Contact phone

Email

Exhibit B
(Confidential Survivor Proof of Claim)

****CONFIDENTIAL SURVIVOR PROOF OF CLAIM ****UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

In re:

Case No. 24-21326

THE ROMAN CATHOLIC BISHOP OF
SACRAMENTO,

Chapter 11

Debtor and
Debtor In Possession.**CONFIDENTIAL SURVIVOR PROOF OF
CLAIM AND CONFIDENTIAL SURVIVOR
SUPPLEMENT****IMPORTANT:****PLEASE COMPLETE THIS FORM SO THAT IT IS RECEIVED NO LATER THAN OCTOBER 1, 2024
("BAR DATE")****PLEASE DO NOT FILE THIS DOCUMENT WITH,
OR SUBMIT IT TO, THE BANKRUPTCY COURT**

This Confidential Survivor Proof of Claim has two separate components: (1) a mandatory three-page "Official Form 410" attached hereto ("Proof of Claim"), and (2) an optional Confidential Survivor Supplement, also attached hereto ("Supplement"). When submitting your Proof of Claim in this case, you are also **strongly encouraged** to also complete the Supplement and include it as an attachment to your Proof of Claim. Submitting the completed Supplement at the outset will help streamline the process of identifying claims and all applicable insurance and expedite distributions to creditors. Providing all of the information requested in this Supplement will allow for a better understanding of the facts supporting your sexual abuse claim against the Debtor. This information will be used in, among other things, efforts to consensually resolve the issues in this chapter 11 case. Additionally, providing the information requested in this Supplement may reduce the likelihood that the parties to the bankruptcy case will need to seek more information from you through a deposition, written interrogatories, or other methods of discovery.

Please carefully read the Notice and Instructions that are included with this Confidential Survivor Proof of Claim and respond to all applicable questions to the best of your ability. If you have an attorney, you should complete this form with the assistance of counsel. Send the executed and completed Survivor Proof of Claim as follows: If by **mail**, to: Donlin, Recano & Company, Inc., Re: The Roman Catholic Bishop of Sacramento, P.O. Box 2053, New York, NY 10272-2042, or if by **hand delivery or overnight courier**, to: Donlin, Recano & Company, Inc., c/o Equiniti, Re: The Roman Catholic Bishop of Sacramento, 48 Wall Street, 22nd Floor, New York, NY 10005, or you may submit a claim **electronically** at: <https://www.donlinrecano.com/Clients/rcbs/FileSurvivorClaim>.

The Confidential Survivor Proof of Claim form must be mailed, delivered or electronically submitted to Donlin, Recano & Company, Inc. ("DRC") so that it is received no later than October 1, 2024. Please note that a Survivor Proof of Claim Form submitted by facsimile, telecopy, or electronic mail transmission will not be accepted and will not be deemed filed.

FAILURE TO COMPLETE AND RETURN A PROOF OF CLAIM (OFFICIAL FORM 410) MAY RESULT IN YOUR INABILITY TO RECEIVE A DISTRIBUTION FROM THE ROMAN CATHOLIC BISHOP OF SACRAMENTO AKA THE DIOCESE OF SACRAMENTO, REFERRED TO HERE AS THE "DIOCESE" AND VOTE ON A PLAN OF REORGANIZATION.

****CONFIDENTIAL SURVIVOR PROOF OF CLAIM ****

YOUR IDENTITY WILL BE KEPT STRICTLY CONFIDENTIAL, AND OUTSIDE THE PUBLIC RECORD OF THE BANKRUPTCY COURT. HOWEVER, THIS CONFIDENTIAL SURVIVOR PROOF OF CLAIM AND THE INFORMATION IN THIS CONFIDENTIAL SURVIVOR PROOF OF CLAIM WILL BE PROVIDED TO THE DEBTOR, THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, CERTAIN INSURERS OF THE DIOCESE AND TO SUCH OTHER PERSONS AS THE BANKRUPTCY COURT DETERMINES NEED THE INFORMATION IN ORDER TO EVALUATE THE CLAIM, ONLY UNDER STRICT, COURT-APPROVED CONFIDENTIALITY GUIDELINES.

This Confidential Survivor Proof of Claim is for Survivor Claimants Only.

For the purposes of this Proof of Claim, a **Survivor Claim** is defined as any Claim (as defined in section 101(5) of the Bankruptcy Code) against the Diocese resulting or arising or related to in whole or in part, directly or indirectly from any actual or alleged sexual conduct or misconduct, grooming, sexual abuse or molestation, indecent assault and/or battery, rape, pedophilia, ephebophilia, or sexually-related physical, psychological, or emotional harm, or contacts, or interactions of a sexual nature between a child and an adult, or a nonconsenting adult and another adult, sexual assault, sexual battery, sexual psychological or emotional abuse, humiliation, intimidation, any other conduct constituting a sexual offense, or any other sexual misconduct, and seeking monetary damages or any other relief based upon the conduct described above, under any theory of liability, including, but not limited to, vicarious liability, any negligence-based theory, conspiracy, fraudulent concealment, intentional tort, continuing tort, public nuisance, invasion of privacy, breach of alleged duties imposed by The Charter for the Protection of Children and Young People, Canon Law or other Catholic Church documents or principles, contribution, indemnity, or any other theory based on any acts or failures to act by the Diocese or any other person or entity for whose acts or failures to act the Diocese is or may be responsible, including but not limited to, claims against clergy, deacons, seminarians, employees, teachers, or volunteers. A Survivor Claim includes all claims for Childhood Sexual Assault, as that term is defined by California Code of Civil Procedure Section 340.1(c).

A **Survivor Claimant** is defined as the person asserting a Survivor Claim against the Diocese, or, if a minor or legally incapacitated adult, then his/her parent or legal guardian or custodian.

Finally, for the purposes of this Proof of Claim, **Abuse** means conduct giving rise to a Survivor Claim.

To be valid, the Confidential Survivor Proof of Claim must be signed by you or your attorney (if represented by one). If the Survivor Claimant is deceased or incapacitated, the Confidential Survivor Proof of Claim may be signed by the Survivor Claimant's representative, executor of the estate or the attorney for the estate. If the Survivor Claimant is a minor or legally incapacitated, the Confidential Survivor Proof of Claim may be signed by the Survivor Claimant's parent or legal guardian or legal custodian, or the Survivor Claimant's attorney.

If you need more space to answer any of the below questions, please attach additional sheets of paper and indicate to which question your answer applies.

**CONFIDENTIAL SURVIVOR PROOF OF CLAIM **

Fill in this information to identify the case:

Debtor 1 The Roman Catholic Bishop of SacramentoDebtor 2
(Spouse, if filing)United States Bankruptcy Court for the: Eastern District of CaliforniaCase number 24-21326

**PLEASE DO NOT FILE THIS DOCUMENT WITH, OR SUBMIT IT TO, THE
BANKRUPTCY COURT. SEND A SIGNED ORIGINAL OF THE COMPLETED
SURVIVOR PROOF OF CLAIM AS FOLLOWS:**

**IF BY MAIL, HAND DELIVERY, OR OVERNIGHT COURIER, TO: THE ROMAN
CATHOLIC BISHOP OF SACRAMENTO, C/O EQUINITI, 48 WALL STREET, 22ND
FLOOR, NEW YORK, NY 1005.**

**IF ELECTRONICALLY AT: <https://www.donlinrecano.com/Clients/rcbs/FileSurvivorClaim>
Official Form 410**

Proof of Claim

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. **Do not send original documents;** they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim**1. Who is the current creditor?**

Name of the current creditor (the person or entity to be paid for this claim)

Other names the creditor used with the debtor

2. Has this claim been acquired from someone else?☐ No☐ Yes. From whom?**3. Where should notices and payments to the creditor be sent?****Where should notices to the creditor be sent?****Where should payments to the creditor be sent? (if different)**Federal Rule of
Bankruptcy Procedure
(FRBP) 2002(g)

Name

Name

Number

Street

Number

Street

City

State

ZIP Code

City

State

ZIP Code

Contact phone

Contact phone

Contact email

Contact email

Uniform claim identifier for electronic payments in chapter 13 (if you use one):

**CONFIDENTIAL SURVIVOR PROOF OF CLAIM **

4. Does this claim amend one already filed? ☐ No
☐ Yes. Claim number on court claims registry (if known) _____ Filed on ____ / ____ / ____
MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim? ☐ No
☐ Yes. Who made the earlier filing? _____

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor? ☐ No
☐ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: ____ _

7. How much is the claim? \$ _____. Does this amount include interest or other charges?
☐ No
☐ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.
Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).
Limit disclosing information that is entitled to privacy, such as health care information.

9. Is all or part of the claim secured? ☐ No
☐ Yes. The claim is secured by a lien on property.

Nature of property:
☐ Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.
☐ Motor vehicle
☐ Other. Describe: _____

Basis for perfection: _____
Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)

Value of property:
\$ _____
Amount of the claim that is secured: _____
\$ _____
Amount of the claim that is unsecured: _____
\$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)

Amount necessary to cure any default as of the date of the petition: \$ _____

Annual Interest Rate (when case was filed) _____ %
☐ Fixed
☐ Variable

10. Is this claim based on a lease? ☐ No
☐ Yes. Amount necessary to cure any default as of the date of the petition. \$ _____

****CONFIDENTIAL SURVIVOR PROOF OF CLAIM ****

11. Is this claim subject to a right of setoff?

☐ No

☐ Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

☐ No

☐ Yes. Check one:

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

☐ Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

☐ Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

☐ Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

Amount entitled to priority

\$ _____

\$ _____

\$ _____

\$ _____

\$ _____

\$ _____

* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☐ I am the creditor.

☐ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date _____
MM / DD / YYYY

Signature

Print the name of the person who is completing and signing this claim:

Name _____
First name Middle name Last name

Title _____

Company _____
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address _____
Number Street

City State ZIP Code

Contact phone _____ Email _____

****CONFIDENTIAL SURVIVOR PROOF OF CLAIM ****UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

In re:

THE ROMAN CATHOLIC BISHOP OF
SACRAMENTO,Debtor and
Debtor In Possession.

Case No. 24-21326

Chapter 11

**OPTIONAL CONFIDENTIAL SURVIVOR SUPPLEMENT TO OFFICIAL FORM 410
FOR USE BY SURVIVOR CLAIMANTS TO ASSERT A SURVIVOR CLAIM****DO NOT FILE THIS DOCUMENT WITH THE COURT**

This supplement to Official Form 410 (“Supplement”) is not required to be filed in order for holders of Survivor Claims¹ to be deemed properly submitted. However, any person asserting a Survivor Claim is encouraged to voluntarily complete this form in full and submit it with the Confidential Survivor Proof of Claim (designated “Official Form 410”). Completing this Supplement in full will allow for a better understanding of the facts supporting your Survivor Claims against the Debtor. This information will be used by the Debtor, the Committee, and other parties in interest, **who are all bound by strict confidentiality agreements**, to, among other things, assist in their efforts to consensually resolve the issues in this Bankruptcy Case. Additionally, providing the information requested in this Supplement may reduce the likelihood that parties to the Bankruptcy Case will need to seek more information from you at some later date under more formal procedures (e.g., deposition, written interrogatories, or other methods of discovery). You may complete none, all, or any portion of this Supplement.

PART 1: CONFIDENTIALITY

The information you share will be kept strictly confidential. This form and the information in it may be provided, pursuant to confidentiality procedures approved by the Bankruptcy Court, to the diocese, certain insurers of the diocese, the Official Committee of Unsecured Creditors, the United States Trustee, and to such other persons as the Bankruptcy Court may authorize. Please be assured that these parties have agreed and are required to keep your information strictly confidential.

¹ Capitalized terms not defined in this Supplement shall have the same meanings given to them in the Instructions to Confidential Survivor Proof of Claim and Confidential Survivor Supplement provided with this Supplement.

****CONFIDENTIAL SURVIVOR PROOF OF CLAIM ******PART 2: IDENTIFYING INFORMATION****A. Survivor Claimant**

First Name

Middle Initial

Last Name

Suffix

Address (If party is incapacitated, is a minor or is deceased, please provide the address of the individual submitting the claim. If you are in jail or prison, your current address).

City

State/Prov.

Zip Code (Postal Code)

Country (if other
than USA)

Telephone No(s):

Home: _____ Work: _____ Cell: _____

Email address: _____

Last 4 digits of Social Security Number: _____

If you are in jail or prison, your identification number: _____

May we leave voicemails for you regarding your claim?

☐ Yes ☐ No

May we send confidential information to your email:

☐ Yes ☐ No

Birth Date: _____

Month

Day

Year

Gender: _____

Any other name, or names, by which the Claimant has been known: _____

****CONFIDENTIAL SURVIVOR PROOF OF CLAIM ****

B. Survivor Claimant's Attorney (if any):

Law Firm Name

Attorney's First Name

Middle Initial

Last Name

Street Address

City

State/Prov.

Zip Code (Postal Code)

Country

(If other than U.S.A.)

Telephone

Fax Number

Email Address

PART 3: NATURE OF COMPLAINT

(Attach additional sheets if necessary)

Note: If you have previously filed a lawsuit against The Roman Catholic Bishop of Sacramento, also known as Diocese of Sacramento ("Diocese") in state or federal court, please attach the complaint, as well as any Fact Sheets and Notices of Adoptions filed in that lawsuit. If you did not file a lawsuit, or if the complaint does not contain all of the information requested below, please provide the information below.

- **Please fill out this Part 3 and Part 4 for each Diocese affiliated perpetrator.**

- a. Who committed the acts of Abuse or other wrongful conduct? Please identify the person by complete name(s) or other description of each abuser to the best of your recollection. If you do not know the name(s) of each abuser, please identify them by title, position or other description (for example, approximate age, height, weight, hair color, clothing worn, identifying marks, etc.).

- b. What is the position, title or relationship to you (if known) of the abuser or individual who committed these acts?

****CONFIDENTIAL SURVIVOR PROOF OF CLAIM ****

- c. Where did the Abuse or other wrongful conduct take place? Please be specific and complete all relevant information that you know, including the City and State, name of church, school or parish (if applicable) and/or the name of any other location(s).

- d. When did the Abuse or other wrongful conduct take place? (Please be as specific as possible here, providing exact dates, grade levels, and/or season of the year (spring, summer, fall, winter), if you remember.)

1. If the Abuse or other wrongful conduct took place over a period of time (months or years), please state when it first started and when it stopped. (Please be as specific as possible. If you can, please indicate the month and year. If you cannot recall the month, please try to recall the season (fall, winter, spring, summer).

2. If the Abuse or other wrongful conduct took place more than once, please state how many times it occurred.

3. Please also state your age(s) and your grade(s) in school (if applicable) at the time the abuse or other wrongful conduct took place. Please be as specific as possible and include what season of the school year (if applicable) it was (fall, winter, spring, summer).

- e. Please describe in as much detail as you can the nature of the abuse and what happened (for example, the circumstances, approximate number of occurrences, frequency, duration, and types of sexual abuse). (Please use additional pages and attach them to this Proof of Claim, if necessary.):

****CONFIDENTIAL SURVIVOR PROOF OF CLAIM ****

- f. Were there any witnesses to the abuse? If so, please identify the witnesses and their present location if known.

- g. Are there any other individuals whom you believe knew about the abuse and/or would be able to corroborate the abuse, including persons as the Diocese? If so, what are their names?

- h. Did you tell anyone about the Abuse or other wrongful conduct, even if not in its entirety? If so, who did you tell, when and what did you tell that person (this would include parents, relatives, friends, the Diocese, counselors, and law enforcement authorities)? You do not need to disclose any communications you had with your attorney.

- i. If subsequent wrongful conduct by the Diocese or its employees or officials caused you further trauma directly or indirectly related to the Abuse state:

1. When the conduct occurred.

2. What happened (describe what happened).

3. If known, identify by name, title, position, and/or relationship to you any individual involved in the conduct.

****CONFIDENTIAL SURVIVOR PROOF OF CLAIM ****

PART 4: IMPACT OF ABUSE

(Attach additional sheets if necessary)

Where more than one perpetrator is alleged, please answer the questions separately as to each perpetrator.

- a. Please describe in detail, being as specific as you can, what injuries (including physical, mental and/or emotional) have occurred to you because of the act or acts of Abuse or other wrongful conduct that resulted in the claim (for example, the effect on your education, employment, personal relationships, health, and any physical injuries).

- b. Have you sought counseling or other treatment for your injuries? If so, with whom and when?

PART 5: ADDITIONAL INFORMATION

- a. Prior Bankruptcy Claims: Have you, or has anyone on your behalf, filed any claims in any other bankruptcy case relating to the Abuse described in this claim?

☐ Yes ☐ No (If Yes, you are required to attach a copy of any completed claim form.)

If Yes, which case(s): _____

- b. Prior Non-Bankruptcy Claims: Have you, or anyone on your behalf, asserted or filed any claim or lawsuit seeking damages for the sexual abuse described in this claim?

☐ Yes ☐ No

If Yes, which case(s): _____ (Please attach a copy of any complaint in such lawsuit).

If Yes, did you file a certificate of merit (described in Cal. Code of Civil Proc. § 340.1(f)?

☐ Yes ☐ No

****CONFIDENTIAL SURVIVOR PROOF OF CLAIM ****

- c. Other Claims or Settlements: Have you ever asserted a claim against the Diocese, or against any entity or individual other than the Diocese (including, but not limited to any parish, church, school, or other organization) relating to Abuse or other wrongful conduct described in this claim?

☐ Yes ☐ No (If Yes, please describe, when you asserted the claim, against whom the claim was asserted, the manner in which the claim was asserted (for example, a complaint made to law enforcement, a lawsuit, a demand letter, or participation in a settlement program), the result of such claim (including, for example, whether such claim resulted in a settlement, payment for counseling, or was adjudicated and, the outcome of such adjudication). You are required to attach a copy of any settlement agreement.)

- d. Bankruptcy. Have you ever filed bankruptcy? ☐ Yes ☐ No (If Yes, please provide the following information:

Name of Case: _____ Court: _____

Date filed: _____ Case No. _____

Chapter: 7 11 12 13 Name of Trustee: _____

Sign and print your name. If you are signing the claim on behalf of another person or an estate, print your title.

Under penalty of perjury, I declare the foregoing statements to be true and correct.

Date: _____

Signature: _____

Print Name: _____

Title: _____

(Relationship of signer to party on behalf of whom claim is being made, such as parent, family member, guardian, custodian, attorney, executor of estate)

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.

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Exhibit C
(Confidentiality Agreement)

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

In re

THE ROMAN CATHOLIC BISHOP OF
SACRAMENTO,

Debtor and
Debtor in Possession.

Case No. 24-21326

Chapter 11

**CLAIMS CONFIDENTIALITY
AGREEMENT**

This Agreement (“Agreement”) is entered into as of _____.

The undersigned (the “Recipient”) is a Permitted Party pursuant to the Order: (1) Fixing Time for Filing Proofs of Claims; (2) Approving Proof of Claim Forms; (3) Providing Confidentiality Protocols; and (4) Approving Form and Manner of Notice (the “Bar Date Order”) [Docket No. ____] on _____, 2024 by the United States Bankruptcy Court for the Eastern District of California (the “Court”) in Case No. 24-21326, In Re: The Roman Catholic Bishop of Sacramento (the “Case”).

WHEREAS, the Recipient requests access to Confidential Survivor Proof of Claim (including the Confidential Survivor Proof of Claim Form and optional Confidential Survivor Supplement)¹ filed in the Case after execution of this Agreement pursuant to and in accordance with the terms of the Bar Date Order;

WHEREAS, Recipient agrees to keep the information provided in any and all Confidential Survivor Proof of Claim confidential pursuant to and in accordance with the terms of the Bar Date Order and this Agreement; and

WHEREAS, with the exception of the parties identified in paragraph 16(d)(1)-(11) of the Bar Date Order, access to the Confidential Survivor Proof of Claim extends only to the natural person who executes this Agreement. A separate confidentiality agreement must be signed by each

¹ Terms used but not defined herein shall have the meaning and definitions ascribed to them in the Bar Date Order.

1 natural person who seeks access to the Confidential Survivor Proof of Claim on behalf of a Permitted
2 Party.

3 **NOW, THEREFORE, IT IS AGREED AS FOLLOWS:**

4 1. Recipient agrees to keep the information provided in the Confidential Survivor Proof
5 of Claim confidential pursuant to and in accordance with the terms of the Bar Date Order;

6 2. Recipient agrees to not distribute any Confidential Survivor Proof of Claim or
7 information provided in the Confidential Survivor Proof of Claim in violation of the Confidentiality
8 Protocols in the Bar Date Order.

9 3. Recipient agrees that only the natural person who executes this Agreement will have
10 access to the Confidential Survivor Proof of Claim unless Recipient is a Permitted Party pursuant
11 to paragraph 16(d)(1)-(11) of the Bar Date Order, in which case the Bar Date Order shall govern the
12 means of execution of a single binding Agreement with respect to such Permitted Party.

13 4. Recipient will only communicate information from the Confidential Survivor Proof
14 of Claim with other Permitted Parties who have executed a confidentiality agreement pursuant to
15 the Bar Date Order.

16 5. Recipient consents to the jurisdiction of the Court to adjudicate any violation of this
17 Agreement or the Bar Date Order.

18 6. Recipient shall report any disclosure of information from a Confidential Survivor
19 Proof of Claim to the Debtor and any appointed Committee within seven days of becoming aware
20 of such disclosure and shall cooperate with efforts to recover the information and/or mitigate the
21 effects of the disclosure.

22 Dated: _____, 2024

23 Signature: _____

24 Print Name: _____

25 Name of Law Firm (if applicable): _____

26 Name of Party Represented: _____

27 Name of Company/Entity: _____

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Exhibit D
(Notice of Bar Date for General Proofs of Claim)

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

In re

THE ROMAN CATHOLIC BISHOP OF
SACRAMENTO,

Debtor and
Debtor in Possession.

Case No. 24-21326

Chapter 11

**NOTICE OF BAR DATE FOR FILING OF
GENERAL CREDITOR PROOF OF
CLAIM FORM¹**

**TO ALL PERSONS AND ENTITIES WITH CLAIMS AGAINST THE ROMAN
CATHOLIC BISHOP OF SACRAMENTO:**

PLEASE TAKE NOTICE that on April 1, 2024 (the “Petition Date”) The Roman Catholic Bishop of Sacramento aka the Diocese of Sacramento, debtor and debtor in possession (“Debtor”) in the above-captioned case (the “Bankruptcy Case”) filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Eastern District of California (the “Court”). The Debtor, its address, case number, proof of claim forms and other relevant information related to this Bankruptcy Case may be obtained at: <https://www.donlinrecano.com/rcbsacramento> .

PLEASE TAKE FURTHER NOTICE that the Court entered an order (the “Bar Date Order”) establishing October 1, 2024, as the claims bar date (“Bar Date”) in the Bankruptcy Case. In Section III of this notice (the “General Creditor Bar Date Notice”), you will find directions for filing, by mail and electronically, a proof of claim against the Debtor.

PLEASE TAKE FURTHER NOTICE that for your convenience, the Debtor has enclosed with this General Creditor Bar Date Notice, a proof of claim form (the “General Creditor Proof of Claim Form”). If this General Creditor Bar Date Notice does not include a General Creditor Proof of Claim Form, you may obtain a copy of the General Creditor Proof of Claim Form by visiting <https://www.donlinrecano.com/Clients/rcbs/Static/POC> or by contacting Donlin, Recano & Company, Inc. at the email address or telephone number listed at the end of this General Creditor Bar Date Notice.

KEY DEFINITIONS

- As used in this General Creditor Bar Date Notice, the term “Entity” has the meaning given to it in section 101(15) of the Bankruptcy Code, and includes all persons (individuals,

¹ Survivor Claimants will receive a separate notice with additional instructions for filing confidential Survivor Claims.

partnerships and corporations), estates, trusts, Governmental Units and the United States Trustee.

- As used in this General Creditor Bar Date Notice, the term “Governmental Unit” has the meaning given to it in section 101(27) of the Bankruptcy Code and includes the United States, states, commonwealths, districts, territories, municipalities, foreign states, or departments, agencies or instrumentalities of the foregoing.
- As used in this General Creditor Bar Date Notice, the term “Claim” shall mean, as to or against the Debtor and in accordance with section 101(5) of the Bankruptcy Code: (i) any right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured or unsecured; or (ii) any right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured or unsecured.

PRELIMINARY INSTRUCTIONS

Claims based on acts or omissions of the Debtor that occurred before April 1, 2024, must be filed on or prior to the Bar Date, even if such claims are not now fixed, liquidated, or certain or did not mature or become fixed, liquidated, or certain before April 1, 2024.

Please note that individuals asserting Claims arising from abuse for which such individuals believe the Roman Catholic Bishop of Sacramento may be liable are instructed to file a Confidential Survivor Proof of Claim, consistent with the Bar Date Order and the Notice of Bar Date for Survivor Proofs of Claim. CLAIMANTS MAY OBTAIN COPIES of these Forms from the Debtor’s Claims, Noticing and Solicitation Agent, Donlin, Recano & Company, Inc. at <https://www.donlinrecano.com/Clients/rcbs/Static/SurvivorClaims> .

A Claimant should consult an attorney if the Claimant has any questions, including whether such Claimant must file a Claim by submitting a General Creditor Proof of Claim Form.

I. WHO MUST FILE A GENERAL CREDITOR PROOF OF CLAIM FORM AND THE BAR DATE

A. *The Bar Date:* The Bar Date Order establishes **October 1, 2024**, as the deadline for filing proofs of claim by submitting a General Creditor Proof of Claim Form in this Bankruptcy Case:

1. The Bar Date: All Entities Excluding Governmental Units. Except as set forth below, pursuant to the Bar Date Order, all Entities, excluding Governmental Units, holding Claims against the Debtor (whether secured, unsecured priority, or unsecured nonpriority) that arose or are deemed to have arisen prior to April 1, 2024, are required to file Claims by submitting a General Creditor Proof of Claim Form on or before the Bar Date, **October 1, 2024.**

1 **Entities that MUST File Claims by submitting a General Creditor Proof of Claim**
2 **Form by the Bar Date:** Except as set forth in paragraph “3” below, the following Entities
must file a Claim on or before the Bar Date:

3 a. Any person or entity whose pre-petition Claim against the Debtor that
4 is not listed in the Debtor’s Schedules or whose pre-petition Claim is listed in the
Schedules but is listed as disputed, contingent or unliquidated and that desires to
5 participate in this case or share in any distribution in this case, including Claims
based on 11 U.S.C. § 503(b)(9); and

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7 b. Any person or entity that believes that its pre-petition Claim is
improperly classified in the Schedules or is listed in an incorrect amount and that
8 desires to have its claim allowed in a classification or amount other than that
identified in the Schedules, including Claims based on 11 U.S.C. § 503(b)(9).

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10 2. The Bar Date: Governmental Units. Except as set forth below, pursuant to
the Bar Date Order, all Governmental Units (as defined by Bankruptcy Code section
11 101(27)) holding Claims against the Debtor that arose or are deemed to have arisen prior to
April 1, 2024, are required to file a Claim by submitting a General Creditor Proof of Claim
12 Form by **October 1, 2024.**

13 **Entities that MUST File Claims by submitting a General Creditor Proof of Claim**
14 **Form by the Bar Date:** Except as set forth in paragraph “3” below, the following Entities
must file a Claim on or before the Bar Date:

15 a. Any person or entity whose pre-petition claim against the Debtor that
16 is not listed in the Debtor’s Schedules or whose pre-petition claim is listed in the
Schedules but is listed as disputed, contingent or unliquidated and that desires to
17 participate in this case or share in any distribution in this case; and

18 b. Any person or entity that believes that its pre-petition claim is
19 improperly classified in the Schedules or is listed in an incorrect amount and that
desires to have its claim allowed in a classification or amount other than that
20 identified in the Schedules.

21 3. **Entities NOT Required to File Claims by the Bar Date:** The Bar Date
22 Order further provides that the following Entities need not file a Claim by submitting a
General Creditor Proof of Claim Form by the Bar Date:

23 a. Any person or entity that has already properly filed a Claim against
24 the Debtor by filing a General Creditor Proof of Claim Form with the Clerk of the
Court for the United States Bankruptcy Court for the Eastern District of California
25 or with Donlin, Recano & Company, Inc., the Debtor’s claims, noticing and
solicitation agent;
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b. Any person or entity: (i) whose claim is listed in the Schedules or any amendments thereto, and (ii) whose claim is not described therein as “disputed,” “contingent,” or “unliquidated,” and (iii) who does not dispute the amount or classification of its claim as set forth in the Schedules;

c. Professionals retained by the Debtor or the Committee pursuant to orders of this Court, who assert administrative claims for payment of fees and expenses subject to the Court’s approval pursuant to Bankruptcy Code sections 330, 331, and 503(b);

d. Any person or entity that asserts an administrative expense claim against the Debtor pursuant to Bankruptcy Code sections 503(b)(1) through (8);

e. Any person or entity whose Claim against the Debtor has been allowed by an order of the Court entered on or before the Bar Date;

f. Any person or entity whose Claim has been paid in full;

g. Any holder of a Claim for which a separate deadline is (or has been) fixed by the Court; and

h. The United States Trustee regarding a claim for quarterly fees under 28 U.S.C. § 1930(a)(6).

II. CONSEQUENCES OF FAILURE TO FILE PROOF OF CLAIM

Any Entity that is required to file a Claim by submitting a General Creditor Proof of Claim Form, but fails to do so by the Bar Date described in this General Creditor Bar Date Notice: (i) may NOT be treated as a creditor with respect to such Claim for the purposes of voting on and distribution under any chapter 11 plan proposed and/or confirmed in this Bankruptcy Case; and (ii) may be forever barred, estopped, and enjoined from asserting such Claim against the Debtor (or filing a proof of claim with respect thereto), and the Debtor and its property may be forever discharged from any and all indebtedness or liability with respect to such Claim.

RESERVATION OF RIGHTS

The Debtor reserves the right to: (i) dispute, or to assert offsets or defenses against, any filed Claim or any Claim listed or reflected in the Schedules as to nature, amount, liability, classification or otherwise; and (ii) subsequently designate any Claim as disputed, contingent or unliquidated. Nothing contained in this General Creditor Bar Date Notice shall preclude the Debtor from objecting to any Claim, whether scheduled or filed, on any grounds.

III. PROCEDURE FOR FILING PROOFS OF CLAIM

Unless one of the exceptions described in **Section I, Paragraph 3** above applies, you **MUST** assert your Claim by submitting an original General Creditor Proof of Claim Form by mail, overnight delivery, courier or hand delivery, or electronically, so that it is received by the Bar Date, as follows:

If General Creditor Proof of Claim Form is sent by mail, send to:

Donlin, Recano & Company, Inc.

Re: The Roman Catholic Bishop of Sacramento

P.O. Box 2053

New York, NY 10272-2042

If General Creditor Proof of Claim Form is sent by Hand Delivery or Overnight Courier, send to:

Donlin, Recano & Company, Inc.

c/o Equiniti

Re: The Roman Catholic Bishop of Sacramento

48 Wall Street, 22nd Floor

New York, NY 10005

If General Creditor Proof of Claim Form is submitted electronically:

<https://www.donlinrecano.com/Clients/rcbs/FileClaim>

Any General Creditor Proof of Claim Form submitted by facsimile or email will not be accepted and will not be deemed filed until the Claim is submitted by the method described in the foregoing sentences.

All General Creditor Proof of Claim Forms must be signed by the creditor or, if the creditor is not an individual, by an authorized agent of the creditor. The General Creditor Proof of Claim Form must be written in English and be denominated in United States currency. In addition, all General Creditor Proof of Claim Forms must include all documentation required by Bankruptcy Rules 3001(c) and 3001(d), including an original or a copy of any written document that forms the basis of the Claim or, for secured Claims, evidence that the alleged security interest has been perfected. If you wish to receive acknowledgement of receipt of your General Creditor Proof of Claim Form, you must also submit by the Bar Date, and concurrently with submission of your original General Creditor Proof of Claim Form: (i) one additional copy of your original General Creditor Proof of Claim Form; and (ii) a self-addressed, stamped return envelope.

ADDITIONAL INFORMATION

1. You may be listed as the holder of a Claim against the Debtor in the Schedules. If you choose to rely on the Schedules, it is your responsibility to determine that the claim is accurately listed in the Schedules. If you hold or assert a Claim that is not listed in the Schedules or if you disagree with the amount or priority of your Claim as listed in the Schedules, or your Claim is listed in the Schedules as either contingent, unliquidated, or disputed, you must file a proof of claim. Copies of the Schedules and the Bar Date Order are available at <https://www.donlinrecano.com/Clients/rcbs/Index>.

2. Questions concerning the contents of this General Creditor Bar Date Notice and requests for General Creditor Proof of Claim Forms should be directed to Donlin, Recano &

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Company, Inc. via email at rcbsacramentoinfo@drc.equiniti.com or by phone at 1-866-714-7301 (U.S. and Canada toll free) or 1-212-771-1128 (International), between the hours of 9:00 a.m. and 5:00 p.m. (prevailing Eastern Time), Monday through Friday. Please note that Donlin, Recano & Company, Inc. is 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.

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Dated: July __, 2024

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FELDERSTEIN FITZGERALD WILLOUGHBY
PASCUZZI & RIOS LLP

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By /s/ Paul J. Pascuzzi
PAUL J. PASCUZZI
JASON E. RIOS
THOMAS R. PHINNEY
MIKAYLA E. KUTSURIS
Attorneys for The Roman Catholic
Bishop of Sacramento

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Dated: July __, 2024

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SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

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By /s/ Ori Katz
ORI KATZ
ALAN H. MARTIN

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Attorneys for The Roman Catholic Bishop of
Sacramento

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Exhibit E
(Notice of Bar Date for Survivor Proofs of Claim)

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

In re

THE ROMAN CATHOLIC BISHOP OF
SACRAMENTO,

Debtor in Possession.

Case No. 24-21326

Chapter 11

**NOTICE OF DEADLINE FOR FILING CLAIMS RELATING TO OR ARISING FROM
SEXUAL ABUSE**

**TO ALL PERSONS AND ENTITIES WITH CLAIMS ARISING FROM SEXUAL
ABUSE FOR WHICH THE ROMAN CATHOLIC BISHOP OF SACRAMENTO MAY BE
LIABLE:**

**OCTOBER 1, 2024 IS THE LAST DATE TO FILE PROOFS OF CLAIM FOR
SEXUAL ABUSE.**

On April 1, 2024 (the “Petition Date”) The Roman Catholic Bishop of Sacramento aka the Diocese of Sacramento, debtor and debtor in possession (“Debtor” or “Diocese”) in the above-captioned case (the “Bankruptcy Case”) filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code in the United States Bankruptcy Court for the Eastern District of California (the “Court”). The Debtor, its address, case number, proof of claim forms and other relevant information related to this Bankruptcy Case may be obtained at: <https://www.donlinrecano.com/rcbsacramento>. Any person who believes that he or she has, or may have, a claim arising from abuse (described below) for which the person believes the Debtor may be liable (each a “Survivor Claim” and collectively, the “Survivor Claims”) should carefully read this notice.

For the purposes of proofs of claim filed against the Diocese by a Survivor Claimant, a “**Survivor Claim**” is defined as: any Claim (as defined in section 101(5) of the Bankruptcy Code) against the Diocese resulting or arising or related to in whole or in part, directly or indirectly from any actual or alleged sexual conduct or misconduct, grooming, sexual abuse or molestation, indecent assault and/or battery, rape, pedophilia, ephebophilia, or sexually-related physical, psychological, or emotional harm, or contacts, or interactions of a sexual nature between a child and an adult, or a nonconsenting adult and another adult, sexual assault, sexual battery, sexual psychological or emotional abuse, humiliation, intimidation, any other conduct constituting a sexual offense, or any other sexual misconduct, and seeking monetary damages or any other relief based upon the conduct described above, under any theory of liability, including, but not limited to, vicarious liability, any negligence-based theory, conspiracy, fraudulent concealment, intentional tort, continuing tort, public nuisance, invasion of privacy, breach of alleged duties imposed by The Charter for the

1 Protection of Children and Young People, Canon Law or other Catholic Church documents or
2 principles, contribution, indemnity, or any other theory based on any acts or failures to act by the
3 Diocese or any other person or entity for whose acts or failures to act the Diocese is or may be
4 responsible, including but not limited to, claims against clergy, deacons, seminarians, employees,
5 teachers, or volunteers. A Survivor Claim includes all claims for Childhood Sexual Assault, as that
6 term is defined by California Code of Civil Procedure Section 340.1(c).

7 A “**Survivor Claimant**” is defined as the person asserting a Survivor Claim against the
8 Diocese, or if a minor or legally incapacitated adult, then his/her parent or legal guardian or
9 custodian.

10 Finally, for the purposes of this Proof of Claim “**Abuse**” means conduct giving rise to a
11 Survivor Claim.

12 **FILING DEADLINE**

13 The United States Bankruptcy Court for the Eastern District of California entered an order
14 (the “Bar Date Order”) establishing **October 1, 2024**, as the last date (the “Survivor Bar Date”) for
15 each Survivor Claimant to file a mandatory three-page “Official Form 410” (the “Survivor Claim
16 Form”). The Survivor Bar Date and the procedures set forth below for filing proofs of claim apply
17 to all Survivor Claims against the Debtor.

18 **WHO MUST FILE**

19 If you believe that you have a Survivor Claim, you must file a Survivor Claim Form (the
20 enclosed Official Form 410) to maintain and/or preserve any claims that you have against the
21 Debtor. Even if you have already filed a lawsuit against the Debtor alleging abuse you must still
22 file a Survivor Claim Form to maintain and/or preserve your rights in the Debtor’s chapter 11 case.
23 No other material is required except the Official Form 410, but you are encouraged to provide
24 additional the information requested in the enclosed Optional Supplement.

25 **WHAT TO FILE**

26 **FILE A SURVIVOR CLAIM FORM (OFFICIAL FORM 410), PLUS ANY**
27 **OPTIONAL SUPPLEMENT, COPIES OF WHICH ARE ENCLOSED. YOU MAY ALSO**
28 **OBTAIN A COPY OF THE SURVIVOR CLAIM FORM AND OPTIONAL SUPPLEMENT**
BY FOLLOWING THE INSTRUCTIONS BELOW. ALL SURVIVOR CLAIM FORMS
AND OPTIONAL SUPPLEMENTS FILED BY A SURVIVOR CLAIMANT WILL BE
KEPT STRICTLY CONFIDENTIAL AS DESCRIBED BELOW.

29 **PROCEDURES FOR FILING A SURVIVOR CLAIM FORM**

30 To file a Survivor Claim Form:

- 31 • Fill out the confidential Survivor Claim Form, and if you so choose, the optional
32 Confidential Survivor Supplement. A copy of each is provided with this Survivor
33 Claims Bar Date Notice, and can also be obtained here:
34 <https://www.donlinrecano.com/Clients/rcbs/Static/SurvivorClaims> .

- 1 • Survivor claimants are strongly encouraged to complete and submit the optional
2 Confidential Survivor Supplement to the Survivor Claim Form. Providing all of the
3 information requested in this Supplement in full will allow the Debtor to understand
4 the facts supporting your Survivor Claim against the Debtor. This information will
5 be used by the Debtor, the Committee, and other parties in interest bound by the strict
6 confidentiality agreements in, among other things, their efforts to consensually
7 resolve the issues in this Bankruptcy Case. Additionally, providing the information
8 requested in the Supplement may reduce the likelihood that parties to the Bankruptcy
9 Case will need to seek more information from you at some later date under more
10 formal procedures (e.g., deposition, written interrogatories, or other methods of
11 discovery).
- 12 • For additional copies of the confidential Survivor Claim Form or Supplement: (a)
13 photocopy the confidential Survivor Claim Form or Supplement; (b) contact the
14 Debtor's claims agent Donlin, Recano & Company, Inc. via email at
15 rcbsacramentoinfo@drc.equiniti.com or by phone at 1-866-714-7301 (U.S. and
16 Canada toll free) or 1-212-771-1128 (International), between the hours of 9:00 a.m.
17 to 5:00 p.m. (prevailing Eastern Time), Monday through Friday, or (c) visit the
18 website at: <https://www.donlinrecano.com/Clients/rcbs/Index>.
- 19 • **Please note that the Debtor's staff is not permitted to give legal advice. You
20 should consult your own attorney for assistance regarding any other inquiries,
21 such as questions concerning the completion or filing of a proof of claim.**
- 22 • Return the original completed Survivor Claim Form and Supplement (if submitting)
23 **so as to be received by October 1, 2024**, as follows:

If Survivor Claim Form is sent by mail, send to:

Donlin, Recano & Company, Inc.
Re: The Roman Catholic Bishop of Sacramento
P.O. Box 2053
New York, NY 10272-2042

If Survivor Claim Form is sent by Hand Delivery or Overnight Courier, send to:

Donlin, Recano & Company, Inc.
C/O Equiniti
Re: The Roman Catholic Bishop of Sacramento
48 Wall Street, 22nd Floor
New York, NY 10005

Or electronically at:

<https://www.donlinrecano.com/Clients/rcbs/FileSurvivorClaim>

- 27 • **Do not file** the Survivor Claim Form or the optional Supplement with the Bankruptcy
28 Court.

- Survivor Claim Forms will be deemed timely filed only if they are received by Donlin, Recano & Company, Inc. by October 1, 2024.
- Please note that a Survivor Claim Form or Supplement submitted by facsimile, telecopy or electronic mail transmission will not be accepted and will not be deemed filed.

CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM

The deadline for filing a Survivor Claim Form is October 1, 2024. Any person who has a Survivor Claim and does not file a Survivor Claim Form by that date may not be treated as a creditor for voting or distribution purposes under any plan of reorganization and such claim will be subject to discharge. Failure to file a Survivor Claim Form may prevent such person from voting on any plan of reorganization in this case. Further, if such Survivor Claim is discharged, the Survivor Claimant may be forever barred and prevented from asserting his or her Survivor Claim against the Debtor or its property, and may not receive any payment or distribution in connection with such Survivor Claim.

CONFIDENTIALITY

Pursuant to the Bar Date Order, any filed Survivor Claim Form and the optional Supplement thereto will remain confidential in this bankruptcy case. Therefore, the Survivor Claim Form and optional Supplement thereto that you file will not be available to the general public, but will be kept strictly confidential, except that as specified by the Bar Date Order information will be provided to the Debtor, the Debtor's attorneys, the United States Trustee's Office for the Eastern District of California, the Debtor's insurers, attorneys for the official committee of unsecured creditors and its members, any unknown claims representative appointed under a plan of reorganization, any settlement trustee appointed to administer payments to Survivor Claimants, and such other persons as the Court determines should have the information in order to evaluate the Survivor Claim, all of whom will have agreed, prior to obtaining any information, to keep the information provided by you as confidential.

Dated: July __, 2024

FELDERSTEIN FITZGERALD WILLOUGHBY
PASCUZZI & RIOS LLP

By /s/ Paul J. Pascuzzi
Paul J. Pascuzzi
Attorneys for The Roman Catholic
Bishop of Sacramento

Dated: July __, 2024

SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

By /s/ Ori Katz
Ori Katz
Alan H. Martin
Attorneys for The Roman Catholic Bishop of
Sacramento

Exhibit F

(Publication Notice)

In re: The Roman Catholic Bishop of Sacramento, Case No. 24-21326
U.S. Bankruptcy Court for the Eastern District of California

Notice of Deadline for Filing Claims: October 1, 2024

**YOU MAY HAVE A SEXUAL ABUSE CLAIM OR OTHER
CLAIM AGAINST THE DIOCESE OF SACRAMENTO**

On April 1, 2024, The Roman Catholic Bishop of Sacramento aka Diocese of Sacramento filed a chapter 11 bankruptcy petition for protection under title 11 of the United States Code.

If you were sexually abused by any person connected with the Diocese, you must file a claim so as to be received by October 1, 2024, or otherwise you will be forever barred, estopped, and enjoined from asserting such claim against the Diocese.

Claims based on acts or omissions of the Diocese that occurred before April 1, 2024, must be filed on or before October 1, 2024, even if such claims are not now fixed, liquidated, or certain or did not mature or become fixed, liquidated, or certain before April 1, 2024.



For more information on how to file a claim or about the bankruptcy, please visit: <https://www.donlinrecano.com/rcbsacramento>, or contact the Debtor's claims agent Donlin, Recano, & Company, Inc. via email at rcbsacramentoinfo@drc.equiniti.com or by phone at 1-866-714-7301; or visit the Debtor's website at <https://scd.org> and follow the links for Chapter 11 filing.