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The Roman Catholic Bishop of San Diego

UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

In re:

THE ROMAN CATHOLIC BISHOP OF
SAN DIEGO, a California Corporation Sole,

Debtor.

Case No. 24-02202

Chapter 11

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

Dept.: 1
Courtroom: 218
Judge: Hon. Christopher B. Latham

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

FEBRUARY 3, 2025 IS THE LAST DATE TO FILE PROOFS OF CLAIM FOR ABUSE.

On June 17, 2024, The Roman Catholic Bishop of San Diego sometimes referred to as The Diocese of San Diego (“Debtor” or “RCBSD”) filed a voluntary petition for relief under chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Southern District of California (the “Court”). 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/rcbsd>. 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 “Survivor Claims”) should carefully read this notice.

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 RCBSD 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 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 RCBSD or any other person or entity for whose acts or failures to act the RCBSD is or was allegedly responsible, including but not limited to, claims against clergy, deacons, seminarians, employees, teachers, or volunteers.

As part of a chapter 11 plan, the RCBSD may seek Court approval to release claims held by Survivor Claimants against other entities that may be related to the RCBSD but that are not debtors in this case, such as parishes and high schools.

A list of credibly accused priests in the Diocese is available on Debtor's website (www.safeinourdiocese.org/accused-priests/). The fact that this list may not include the name of the priest who sexually abused you does not mean that you should not file a Survivor Claim Form. This is a list of priests in the Diocese against whom Debtor has vetted reports of Sexual Abuse through the internal processes of Debtor.

FILING DEADLINE

THE COURT ENTERED AN ORDER (THE "BAR DATE ORDER") ESTABLISHING **FEBRUARY 3, 2025**, AS THE LAST DATE (THE "SURVIVOR BAR DATE") FOR EACH SURVIVOR CLAIMANT TO FILE A PROOF OF CLAIM FORM (THE "SURVIVOR PROOF OF CLAIM"). THE SURVIVOR BAR DATE AND THE PROCEDURES SET FORTH BELOW FOR FILING PROOFS OF CLAIM APPLY TO ALL SURVIVOR CLAIMS ASSERTED AGAINST DEBTOR.

WHO MUST FILE

If you believe that you have a Survivor Claim, you must file a Survivor Proof of Claim by the Survivor Bar Date to maintain and/or preserve any claims that you have against RCBSD. Even if you have already filed a lawsuit against RCBSD alleging abuse, you must still file a Survivor Proof of Claim to maintain and/or preserve your rights in RCBSD's chapter 11 case. You are also strongly encouraged to complete and submit a Confidential Survivor Supplement (the "Survivor Supplement" and together with the Survivor Proof of Claim, the "Survivor Claim Form") together with the Survivor Proof of Claim. If you fail to complete and submit the Survivor Supplement by the Survivor Bar Date, your claim may be subject to objection and disallowance unless you thereafter furnish additional information in support of your Survivor Claim.

WHAT TO FILE

FILE A CONFIDENTIAL SURVIVOR PROOF OF CLAIM AND A VOLUNTARY CONFIDENTIAL SURVIVOR SUPPLEMENT, COPIES OF WHICH ARE ENCLOSED, AND ANY ADDITIONAL INFORMATION YOU WISH TO ATTACH TO THE SUPPLEMENT. YOU MAY ALSO OBTAIN A COPY OF THE SURVIVOR PROOF OF CLAIM AND THE CONFIDENTIAL SURVIVOR SUPPLEMENT BY FOLLOWING THE INSTRUCTIONS BELOW.

PROCEDURES FOR FILING A SURVIVOR CLAIM FORM

To file a Survivor Claim Form:

- Fill out the confidential Survivor Proof of Claim, and the Confidential Survivor Supplement, together with any additional information you wish to submit. A copy of the Survivor Proof of Claim and the Confidential Survivor Supplement is provided with this Survivor Claims Bar Date Notice, and can also be obtained here: <https://www.donlinrecano.com/Clients/rcbsd/Static/SurvivorClaims>.
- If you submitted a Confidential Plaintiff Questionnaire for Settlement Purposes (a “Questionnaire”) in the action entitled *In re Diocese of San Diego Cases*, JCCP No 5105 in the Superior Court of the State of California, County of San Diego you may attach the Questionnaire and reference the Questionnaire in response to any question in Parts 4 through 7 of the Confidential Survivor Supplement, rather than answering those questions again in the Survivor Supplement. You also may supplement your prior responses to the Questionnaire in the space provided in the Confidential Survivor Supplement, but the answers from the Questionnaire that you reference will be incorporated into your sworn Confidential Survivor Supplement unless you expressly state your intention to modify those answers in your responses to the Survivor Supplement.
- For additional copies of the confidential Survivor Claim Form: (a) photocopy the confidential Survivor Claim Form; (b) contact the Debtor’s claims agent Donlin Recano via email at rcbsdinfo@drc.equiniti.com or by phone at 1-866-521-4424 (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, or (c) visit the website at: <https://www.donlinrecano.com/rcbsd>.
- **Please note that Debtor’s staff 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.**
- Return the original completed Survivor Proof of Claim **so as to be received by February 3, 2025**, as follows:

If Survivor Claim Form is sent by mail:

Donlin, Recano & Company, LLC
Re: The Roman Catholic Bishop of San Diego

P.O. Box 2053
New York, NY 10272- 2042

If Survivor Claim Form is sent via hand delivery or overnight courier

Donlin, Recano & Company, LLC
C/O Angeion Group
Re: The Roman Catholic Bishop of San Diego
200 Vesey Street, 24th Floor
New York, NY 10281

Or electronically at:

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

- **Do not file the Survivor Proof of Claim or the Confidential Survivor Supplement with the Bankruptcy Court.**
- Survivor Claim Form will be deemed timely filed only if received by Donlin Recano by **February 3, 2025**.
- Please note that a Survivor Claim Form 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 FEBRUARY 3, 2025. ANY PERSON WHO HAS A SURVIVOR CLAIM AND DOES NOT FILE A SURVIVOR PROOF OF CLAIM 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 PROOF OF CLAIM 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 RCBSD OR ITS PROPERTY, AND MAY NOT RECEIVE ANY PAYMENT OR DISTRIBUTION IN CONNECTION WITH SUCH SURVIVOR CLAIM. ANY PERSON SUBMITTING A SURVIVOR PROOF OF CLAIM IS STRONGLY ENCOURAGED TO ATTACH A SURVIVOR SUPPLEMENT. IF A SURVIVOR FILES A SURVIVOR PROOF OF CLAIM WITHOUT ATTACHING A SURVIVOR SUPPLEMENT, THE CLAIM MAY BE SUBJECT TO OBJECTION AND DISALLOWANCE UNLESS ADDITIONAL INFORMATION IN SUPPORT OF THE CLAIM IS THEREAFTER PROVIDED.

CONFIDENTIALITY

Pursuant to the Bar Date Order, all Survivor Proofs of Claim and the Confidential Survivor Supplements and any attachments thereto shall remain confidential in this bankruptcy case. Therefore, the Survivor Claim Form, including the Confidential Survivor Supplement, that you file will not be available to the general public, but will be kept confidential, except that as specified by

1 court order, information will be provided to Debtor, Debtor's attorneys, the United States Trustee,
2 Debtor's insurer(s), attorneys for the Official Committee of Unsecured Creditors and its members,
3 any unknown claims representative appointed under a plan of reorganization, any settlement trustee
4 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
agree to keep the information provided by you confidential.

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6 Dated: November 15, 2024

GORDON REES SCULLY MANSUKHANI,
LLP

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8 BY: /s/ Jeffrey D. Cawdrey

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