



**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**
Caption in Compliance with D.N.J. LBR 9004-1(b)

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Chapter 11 Debtor and Debtor-in-Possession*

In re:

THE DIOCESE OF CAMDEN, NEW JERSEY,

Debtor.

Order Filed on February 11, 2021
by Clerk
U.S. Bankruptcy Court
District of New Jersey

Chapter 11

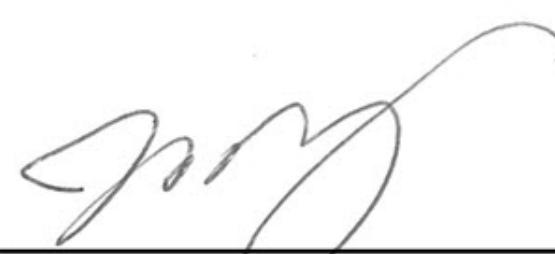
Case No. 20-21257 (JNP)

Hearing Date and Time:
January 27, 2021 at 10:00 a.m.

**ORDER ESTABLISHING DEADLINE FOR FILING
PROOFS OF CLAIM AND APPROVING THE FORM AND
MANNER OF NOTICE THEREOF**

The relief set forth on the following pages, numbered two (2) through seventeen (17), be and hereby is **ORDERED**.

DATED: February 11, 2021


Honorable Jerrold N. Poslusny, Jr.
United States Bankruptcy Court

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Debtor: The Diocese of Camden, New Jersey

Case No.: 20-21257 (JNP)

Caption of Order: Order Establishing Deadline for Filing Proofs of Claim and Approving the Form and Manner of Notice Thereof

THIS MATTER is before this Court upon the motion (the “Motion”)¹ of The Diocese of Camden, New Jersey, the debtor and debtor-in-possession (the “Diocese”) in this chapter 11 case (the “Chapter 11 Case”) requesting entry of an order: (a) establishing deadlines to file proofs of claim against the Diocese, including but not limited to, claims arising under section 503(b)(9) of the Bankruptcy Code, (b) approving the form and manner of notice of the Bar Date (defined below), (c) authorizing the Diocese to publish notice of the Bar Date, and (d) granting related relief; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Standing Order of Reference to the Bankruptcy Court Under Title 11* of the United States District Court for the District of New Jersey, as amended on September 18, 2012; and venue being proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and notice of the Motion being sufficient under the circumstances; and it appearing that no other or further notice need be provided; and the Official Committee of Tort Claimant Creditors (the “Committee”) and certain other parties having objected to the Motion; and the Court having held a hearing on the Motion on January 27, 2021; and the Court having issued an oral opinion on February 5, 2021; and the Court having determined that the relief sought in the Motion, as modified by this Order, is in the best interests of the Diocese, its estate and creditors; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED AS FOLLOWS:

1. The Motion is **GRANTED** as set forth herein.

¹ Capitalized terms used but not defined herein shall have the same meaning ascribed to such terms in the Motion.

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A. Approval of Proof of Claim Forms

2. The General Proof of Claim Form, in the form annexed hereto as **Exhibit A**, is hereby approved.

3. The Proof of Claim Form asserting Survivor Claims (the “Survivor Proof of Claim”), in the form substantially similar to the form attached as **Exhibit B**, is hereby approved.

B. Claims Bar Date

4. **June 30, 2021 at 11:59 p.m. (prevailing Eastern time)** (the “Bar Date”) is the deadline by which all persons and entities must file prepetition claims in this Chapter 11 Case, including, but not limited to: (i) a claim related to sexual abuse committed by any person connected with the Diocese; (ii) any claims under 11 U.S.C. § 503(b)(9); and (iii) all governmental units (as defined in section 101(27) of the Bankruptcy Code) (“Governmental Units”). For purposes of this Order, a “Survivor Claim” and a “Survivor Claimant” is as defined in the Survivor Proof of Claim Form (annexed hereto as Exhibit B).

C. Who Must File a Proof of Claim and Consequences for Failure To Do So

5. **Except as set forth otherwise herein, the following persons or entities must file a proof of claim on or before the Bar Date:**

a. Any person or entity who believes its prepetition claim was omitted from the Diocese’s Schedules of Assets and Liabilities (as amended) filed in this Chapter 11 Case (the “Schedules”), or whose prepetition claim is listed in the Schedules, but is designated as being “contingent,” “unliquidated,” or “disputed,” and who may be entitled to any distributions to creditors that may be made in this Chapter 11 Case.

b. Any person or entity who believes that its prepetition claim is improperly classified in the Schedules or is listed in an incorrect amount and that desires

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to have its claim allowed in a classification or amount other than as identified in the Schedules.

- c. Any Survivor Claimant who wishes to assert a Survivor Claim against the Diocese, regardless of whether such person has previously filed a lawsuit against the Diocese or otherwise has given formal or informal notice of such claims to the Diocese, including any person whose claim may be barred by a statute of limitations or repose in effect as of the Bar Date.

6. **The following persons or entities are not required to file proofs of claim at this time:**

- a. Any person or entity that has already properly filed a proof of claim against the Diocese with the Clerk of the Court for the United States Bankruptcy Court for the District of New Jersey, except that, any person who has asserted a Survivor Claim must submit a completed Survivor Proof of Claim;
- b. Any person or entity: (a) whose claim is listed in the Schedules or any amendments thereto; and (b) whose claim is not identified therein as “contingent,” “unliquidated,” or “disputed,” and (c) who does not dispute the amount or classification of its claim as set forth in the Schedules;
- c. Any professionals retained by: (i) the Diocese; (ii) the Committee; (iii) the Official Committee of Unsecured Trade Creditors (the “Trade Committee”); and (iv) any other committee appointed by the Office of the United States Trustee pursuant to orders of this Court, who assert administrative claims for payment of fees and expenses subject to the Court’s approval, pursuant to sections 330, 331(a) and 503(b) of the Bankruptcy Code;
- d. Any person or entity that asserts an administrative expense claim against the Diocese pursuant to sections 503(b) or 507(a)(2) of the Bankruptcy Code;
- e. Any person or entity whose claim against the Diocese is allowed by an order of the Court entered on or before the Bar Date; and
- f. Any person or entity whose claim has been previously settled or paid in full or released.

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7. Any person or entity who is required to file a proof of claim pursuant to this Order but fails to do so on or before the applicable Bar Date (i) shall not be treated as a creditor with respect to such Claim and shall not be entitled to vote to accept or reject, or to share in any distribution under, any Chapter 11 plan proposed and/or confirmed in this Chapter 11 Case; and (ii) **shall be forever barred, estopped, and enjoined from asserting such Claim against the Diocese, and the Diocese and its property shall be forever discharged from any and all indebtedness or liability with respect to such Claim.**

8. Notwithstanding anything to the contrary in this Order and subject to Bankruptcy Rule 9006, a Survivor Claimant whose Survivor Claim has not yet accrued pursuant to N.J.S.A 2A:14-2, S.477, 218th Leg., 2d Ann. Sess. (N.J. 2019) is not subject to the provisions of paragraph 7.

9. For the avoidance of doubt, nothing contained in this Order shall preclude a claimant from seeking relief from the Court to file a late-filed claim in accordance with Bankruptcy Rule 9006.

10. The filing of a Survivor Proof of Claim shall not constitute a waiver of the claimant's right to a jury trial, if any.

D. Filing a Proof of Claim

11. **Proofs of claim may not be filed with the Court or with the Clerk of the Court. Instead, all proofs of claim must be submitted to Prime Clerk, the Diocese's Claims and Noticing Agent ("Prime Clerk"), as set forth in paragraphs 12 and 13 below.**

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12. All claimants, except for those asserting Survivor Claims, shall submit their proof of claim using the General Proof of Claim Form, a copy of which is attached hereto as **Exhibit A**. In order to be considered valid, each General Proof of Claim submitted in this Chapter 11 Case must: (a) be written in English, (b) be denominated in lawful currency of the United States as of the Petition Date, (c) have attached copies of any writings upon which the claim is based in accordance with Bankruptcy Rules 3001(c) and 3001(d) (including for secured claims, evidence that the security interest has been perfected) unless such writings are voluminous or confidential, in which case a summary must be attached or an explanation provided as to why such writings are not available and such writings will be provided to the Diocese, the Committee and/or the Trade Committee upon request, and (d) be actually received by Prime Clerk on or before the Bar Date. Proofs of claim may be filed (i) electronically using the interface available on Prime Clerk's website at <https://cases.primeclerk.com/camdendiocese/EPOC-Index>, or (ii) by mail, overnight courier, or hand delivery to Prime Clerk's address. Proofs of claim sent by facsimile, telecopy, or e-mail will not be accepted. In the event that a completed General Proof of Claim is mailed to or personally delivered to the Clerk of the Court for the United States Bankruptcy Court for the District of New Jersey, the Clerk of the Court is directed to mark the Proof of Claim with the date and time of receipt, place the Proof of Claim Form in a sealed envelope, and transmit the sealed envelope to Prime Clerk at the address for receipt of General Proofs of Claim Forms above.

13. All claimants asserting Survivor Claims shall submit their proof of claim using the Survivor Proof of Claim Form, a copy of which is attached hereto as **Exhibit B**. In order to be considered valid, each Survivor Proof of Claim must: (a) be written in English or include a

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translation to English, (b) contain responses to substantially all requests for information set forth therein to the best of the Survivor Claimant's knowledge at the time the form is signed, (c) be signed by the Survivor Claimant or its attorney or if such Survivor Claimant is a minor, legally incapacitated, or deceased, by such Survivor Claimant's parent, legal guardian or executor, and (d) be actually received by Prime Clerk on or before the Bar Date. Proofs of claim may be filed (i) electronically using the interface available at <https://cases.primeclerk.com/camdendiocese/EPOC-Index>, or (ii) by mail, overnight courier, or hand delivery to Prime Clerk's address. Proofs of claim sent by facsimile, telecopy, or e-mail will not be accepted. In the event that a completed Survivor Proof of Claim is mailed to or personally delivered to the Clerk of the Court for the United States Bankruptcy Court for the District of New Jersey, the Clerk of the Court is directed to mark the Survivor Proof of Claim with the date and time of receipt, place the Survivor Proof of Claim in a sealed envelope, and transmit the sealed envelope to Prime Clerk at the address for receipt of Survivor Proofs of Claim above. A Survivor Claim may only be made on account of Abuse of an individual. Any other claim shall be asserted as a General Claim.

14. If a claimant submits a timely proof of claim that asserts or appears to assert a Survivor Claim on a document that is not a Survivor Proof of Claim Form, such claim will be treated as timely filed only if such claimant submits a completed Survivor Proof of Claim as of the later of the Bar Date and the date which is thirty days following written notice by the Diocese to such Survivor Claimant from the Diocese of the need to complete and submit a Survivor Proof of

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Claim. The Diocese shall provide a copy of such notice to the Committee at the same time the notice is sent to the claimant.

E. Confidentiality Protocol

15. Due to the sensitive nature of the information requested in the Survivor Proof of Claim Form, the following confidentiality protocol (“Confidentiality Protocol”) shall apply to all Survivor Proofs of Claim (and General Proofs of Claim that assert or appear to assert a Survivor Claim) submitted by Survivor Claimants. Notwithstanding anything herein to the contrary, the following Confidentiality Protocol and the Confidentiality Agreement (defined below) are for the sole protection of Survivor Claimants and as set forth in more detail in the Confidentiality Agreement, the facts and details of the alleged abuse along with the name of the alleged clergy or agent(s) of the Diocese involved are not deemed confidential.

- (i) All claimants asserting a Survivor Claim shall submit such claims directly to Prime Clerk, the Diocese’s Claims and Noticing Agent, using the Survivor Proof of Claim Form. Such claims should not be filed with the Court.
- (ii) Survivor Proofs of Claim received by Prime Clerk shall be treated as confidential and will be made available only to Authorized Parties (as defined below) unless a Survivor Claimant affirmatively elects to have their Survivor Proof of Claim disclosed publicly. Any claim that appears to be a Survivor Claim that is filed as a General Claim shall be treated by Prime Clerk as a confidential claim pending resolution of the claimant’s intent regarding confidential treatment of such claim. The Confidentiality Protocol is for the sole and exclusive benefit of the Survivor Claimants. Accordingly, any Survivor Claimant may elect to make information contained in his or her personal Survivor Proof of Claim public, even if he or she does not elect to have his or her personal Survivor Proof of Claim disclosed publicly. For the avoidance of doubt, Survivor Claimants are not bound by the confidentiality provisions of this Order with respect to

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disclosures regarding their own Abuse or any information disclosed by a Survivor Claimant in his or her Survivor Claim.

(iii) Survivor Proofs of Claim received by Prime Clerk shall be held and treated as confidential by Prime Clerk, and copies thereof shall be provided or made available only to the following parties (the "Authorized Parties"):

- i. The Bishop of the Diocese, officers of the Diocese, and such other current or former employees of the Diocese who are necessary to assist the Diocese in reviewing and analyzing the Survivor Proofs of Claim. For the avoidance of doubt, any person that was disclosed to the Diocese as an individual who had allegedly committed an act of abuse, as well as any person identified as an alleged abuser in a Survivor Proof of Claim Form or who is otherwise acknowledged by the Diocese as someone who committed Abuse, shall not be an Authorized Person; *provided, however,* that the Diocese is authorized to discuss the contents of any Survivor Proof of Claim, (other than the claimant's name, address, the signature block and any other information which could reasonably be used to personally identify a Survivor Claimant or any witness to the abuse disclosed in the Survivor Proof of Claim Form), with a person identified as an alleged abuser who was not previously disclosed to the Diocese as an individual who had committed an act of abuse, *provided, further,* that if the Diocese seeks to disclose information that could reasonably be used to identify a Survivor Claimant or a witness identified in a Survivor Proof of Claim Form to an alleged abuser, the Diocese may do so upon written consent from the Committee and the Survivor Claimant. If the Committee does not consent, the Diocese may contact the Court to arrange a telephonic conference seeking such authorization upon no less than three (3) days' notice to the affected Survivor Claimant(s), the Committee and the Diocese;
- ii. Counsel to the Diocese (including any special counsel or other counsel), counsel to the Committee, and counsel to the Trade Committee, including partners, counsel, associates, and employees of such counsel;
- iii. Members of the Committee and their individual counsel (after the Survivor Proof of Claim has been redacted to remove the claimant's name, address, the signature block and any other information which

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could reasonably be used to personally identify a Survivor Claimant);

- iv. Any insurance company that provided insurance or reinsurance that may cover the claims described in any Survivor Proof of Claim, together with their respective successors, reinsurers, counsel, experts and consultants; *provided, however,* that the Diocese's insurers shall be provided with all Survivor Proof of Claim Forms alleging any abuse that occurred, even in part, during such insurer's policy periods, *provided further,* that access by the Diocese's insurers to Survivor Proof of Claim Forms alleging that abuse occurred wholly outside such insurer's policy periods shall be resolved at a later date, with nothing in this Order affecting such potential access;
- v. Any person appointed pursuant to an order of the Bankruptcy Court to serve as a mediator, as a representative for unknown or future claimants, or as a special arbitrator/claims reviewer appointed to review and resolve Survivor Claims, in this Chapter 11 Case or any adversary proceeding filed in this Chapter 11 Case;
- vi. 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;
- vii. Any person upon express written consent of the affected Survivor Claimant, *provided, however,* that if the Survivor Claimant filed his or her claim *pro se*, then consent of the Survivor Claimant and counsel to the Committee shall be obtained before disclosing such claimant's proof of claim to any person;
- viii. Any person with the express written consent of the Diocese and the Committee, upon 10 business days' notice to the affected Survivor Claimant(s) and the affected Survivor Claimant(s)' attorney, if known. A Survivor Claimant may file an objection with the Court concerning the disclosure of a Survivor Proof of Claim within the notice period;
- ix. Such other persons as the Court may authorize to access to one or more of the Survivor Proofs of Claim pursuant to subsequent order; *provided, however,* that any such determination shall be made on no

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less than 7 days' notice to the affected Survivor Claimant(s), the Committee and the Diocese;

- x. Counsel of record to any Authorized Party upon execution of a Confidentiality Agreement by such counsel;
 - xi. The Office of the United States Trustee. Paragraphs 15(iv) and 15(v) of this Order shall not apply to the U.S. Trustee; and
 - xii. Any party as ordered by the Court on no less than ten (10) days' notice to the Diocese and the Committee.
- (iv) Notwithstanding the designation of Authorized Parties above, no person or entity may obtain copies of any Survivor Proof of Claim prior to the execution of a confidentiality agreement substantially in the form attached hereto as **Exhibit C** (the "**Confidentiality Agreement**"); *provided, however* that a mediator appointed in the case shall not be required to execute a confidentiality agreement if such mediator is currently a Bankruptcy Judge, a District Court Judge, or a State Court Judge. Counsel of record to any Authorized Party shall only be required to execute a single Confidentiality Agreement, which shall be deemed binding on their entire firm. Access to the Survivor Proofs of Claim for all other Authorized Parties shall be restricted to the natural person who executes a Confidentiality Agreement, and a separate Confidentiality Agreement must be signed by each natural person seeking access to the Survivor Proofs of Claim on behalf of an Authorized Party. Copies of all Confidentiality Agreements shall be provided to the Diocese and the Committee through their respective counsel.
- (v) Authorized Parties in possession of any Survivor Proof(s) of Claim shall keep such Survivor Proof(s) of Claim confidential and shall not use or disclose any information provided in any Survivor Proof(s) of Claim except in accordance with the terms of this order, the Confidentiality Agreement or pursuant to an order of this Court, unless the Survivor Claimant has elected to make his or her Survivor Proof of Claim public by indicating such consent in the Survivor Proof of Claim Form. If an Authorized Party seeks to share information with a non-Authorized Party or contact a witness identified in a Survivor Proof of Claim Form based upon information obtained solely from the Survivor Proof of Claim Form, such Authorized Party must provide fourteen (14) days' notice (the "**Notice Period**") to: (i) the Survivor Claimant; (ii) the Survivor Claimant's counsel (if known); (iii)

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counsel for the Diocese; and (iv) counsel for the Committee. If an objection is made within the Notice Period, no disclosure of such information shall be made unless and until a decision is rendered by the Bankruptcy Court;

- (vi) Prime Clerk shall assign to each claimant asserting a Survivor Claim a unique identifier code and shall maintain a confidential list of the identities of the Survivor Claimants, their corresponding identifier code, and their respective Survivor Proof(s) of Claim. The confidential list of the identities of Survivor Claimants shall be provided only to such parties that are Authorized Parties entitled to the personally identifying information of Survivor Claimants pursuant to this Order.
- (vii) Survivor Proofs of Claim received by Prime Clerk, including any attachments thereto, shall not be made publicly available on the Diocese's case website and shall be redacted on the claims register. For the avoidance of doubt, only the claim number and claim amount will be made publicly available on the case website and only such information will be included in the publicly available claims register.

F. Exculpation

16. Notwithstanding anything herein to the contrary, Prime Clerk shall be exculpated from liability² for, and shall be under no obligation or duty to advise claimants and/or make determinations as to whether the appropriate proof of claim form was used; *provided however*, to the extent that a claimant seeks such advice, Prime Clerk shall refer the claimant to the instructions detailing the proof of claim forms in the Bar Date Notice and to Prime Clerk's proof of claim website for these cases at <https://cases.primeclerk.com/camdendiocese/>; *further provided, however*, that in no event shall Prime Clerk be exculpated in the case of its own bad faith, self-dealing, breach of fiduciary duty (if any), gross negligence or willful misconduct.

² Whenever Prime Clerk is acting on behalf of the Clerk of the Court, the exculpation provision in this Order shall also apply to the Clerk of the Court.

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G. Service of the Bar Date Notice

17. Within fifteen (15) days following entry of this Order, the Diocese shall serve by United States mail, first-class postage prepaid: (i) notice of the Bar Date, substantially in the form attached to this Order as **Exhibit D** and incorporated herein by reference (the “**Bar Date Notice**”); and (ii) a copy of the General Proof of Claim Form (together with the Bar Date Notice, the “**General Claim Notice Package**”), upon (a) the Office of the United States Trustee; (b) counsel to the Committee, counsel to the Trade Committee, and any other committee appointed in this case; (c) all entities who have filed a notice of appearance in the Diocese’s case; (d) all creditors listed in the Diocese’s Schedules (except those creditors listed on the portions of Schedule F filed under seal relating to Survivor Claimants); (e) all parties to executory contracts and unexpired leases of the Diocese; (f) all entities that have previously filed proofs of claim in the Diocese’s Chapter 11 Case; (g) any other entities or their counsel, including governmental units, known to the Diocese as entities who may reasonably be expected to have claims against the estate; and (h) such additional persons and entities as deemed appropriate by the Diocese.

18. Within fifteen (15) days following entry of this Order, the Diocese shall serve by United States mail, first-class postage prepaid: (i) the Bar Date Notice, (ii) a copy of this Order (without exhibits or schedules), and (iii) a Survivor Proof of Claim Form (together with the Bar Date Notice and this Order, the “**Survivor Claim Notice Package**”), upon each person, or their respective counsel, who, (a) is listed on that portion of the Diocese’s Schedule F filed under seal, or (b) to the knowledge of the Diocese as determined after a review of the Diocese’s books and records has (1) filed, or threatened to file, a lawsuit against the Diocese alleging that such Survivor

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Claimant was subjected to Abuse by an individual for whom the Diocese was allegedly responsible; (2) otherwise contacted the Diocese to report that they were subjected to Abuse by an individual for whom the Diocese was allegedly responsible, whether or not that individual's claim was considered to be substantiated and whether or not the report was written or verbal, in either case where contact information for such person or his or her attorney is included in the Diocese's books and records; (3) been identified to the Diocese as an individual who was subjected to Abuse by an individual for whom the Diocese was allegedly responsible to the extent contact information for such person or his or her attorney is included in the Diocese's books and records; or (4) previously filed a proof of claim in the Diocese's Chapter 11 Case asserting a claim based on Abuse. The Survivor Claim Notice Package shall also be served upon (a) the Office of the United States Trustee; (b) counsel to the Committee; (c) counsel to the Trade Committee; and (d) any other committee appointed in this case. Notwithstanding the foregoing, the Diocese shall not be required to send a Survivor Claim Notice Package to any person who has previously entered into a settlement with the Diocese regarding a claim based on Abuse if the Diocese has performed all of its obligations under the terms of such settlement.

19. In addition to providing direct notice to known creditors as set forth above, subject to applicable publication guidelines and submission deadlines, the Diocese shall cause a notice in substantially the form attached hereto as Exhibit E (the "Publication Notice") to be published as follows: (i) three times in a national edition of the *New York Times*, *USA Today*, or the *Wall Street Journal*, with the first publication as soon as practicable, the second publication no later than April 15, 2021, and the third publication no later than June 7, 2021; and (ii) twice in *The Philadelphia*

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Inquirer, The Courier-Post, South Jersey Times, The Daily Journal, The Press of Atlantic City, and The Cape May County Herald, with the first publication no later than sixty (60) prior to the Bar Date and the second publication no later than thirty (30) days prior to the Bar Date.

20. In addition to the foregoing publication, the Diocese shall use reasonable best efforts to take the following additional measures to disseminate information relating to the Bar Date as soon as practicable following entry of this Order:

(i) Beginning within fifteen (15) days of the Bar Date Order and at least through the Bar Date, the Diocese will cause prominent, one-click links to the General Claim Notice Package and the Survivor Claim Notice Package to be posted on the case management website maintained by Prime Clerk.

(ii) The Diocese will establish and maintain, or cause Prime Clerk to establish and maintain, a telephone number which may be used by claimants to ask questions or to request copies of the General Claim Notice Package, the Survivor Claim Notice Package, or parts thereof;

(iii) Beginning within fifteen (15) days of the Bar Date Order and at least through the Bar Date, the Diocese will cause links to the General Claim Notice Package and the Survivor Claims Notice Package to be posted on the Diocese's website homepage. In addition, the Diocese will cause links to the General Claim Notice Package and the Survivor Claims Notice Package to be posted every thirty (30) days on the home page for <https://catholicstarherald.org/>.

(iv) Beginning within fifteen (15) days of the Bar Date Order and until the Survivor Claim Bar Date, the Diocese will cause links to the General Claim Notice Package and the Survivor Claims Notice Package to be posted on its Facebook and Twitter account in a pinned posting, and, to such posting shall provide one-click links to the General Proof of Claim Form and the Survivor Proof of Claim Form. The Diocese's Facebook and Twitter accounts shall be updated every thirty (30) days between now and the Bar Date by posting one-click links to the General Proof of Claim Form and the Survivor Proof of Claim Form.

(v) Beginning within fifteen (15) days of the Bar Date Order and until the Bar Date, the Diocese will cause, to the Diocese's reasonable best efforts, the Survivor Claims Notice Package to be posted on a Facebook or Twitter account maintained by any Parish of the Diocese in a pinned posting and/or in a Parish bulletin.

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(vi) Within fifteen (15) days of entry of the Bar Date Order, the Diocese will issue a press release regarding the Bar Date and including the Bar Date Notice to the news departments of the following newspapers: *The Philadelphia Inquirer*, *The Courier-Post*, *South Jersey Times*, *The Daily Journal*, *The Press of Atlantic City* and *The Cape May County Herald*.

(vii) Beginning within fifteen (15) days of the Bar Date Order through the Bar Date, the Diocese will cause a copy of the Publication Notice to be read on KYW News Radio.

(viii) The Diocese will mail a copy of the Publication Notice to each parish and ministry (except primary and secondary schools) affiliated with the Diocese with a request to display the Publication Notice in a prominent place until expiration of the Bar Date.

(ix) The Diocese will place a copy of the Publication Notice in each edition of the *Catholic Star Herald* until the Bar Date.

(x) The Diocese will mail a copy of the Bar Date Notice to the following on the Diocese's stationary and shall request that the party post the Bar Date Notice in a prominent place until the expiration of the Bar Date:

- i. the Attorney General of the State of New Jersey; and
- ii. For each of the counties of Atlantic, Camden, Cape May, Cumberland, Gloucester, and Salem:
 1. the prosecutor's office;
 2. sheriff's office;
 3. at least one public health agency in each county; and
 4. at least one substance abuse agency or hospital (if any).

21. The Court finds that the form and manner of giving notice of the Bar Date as approved herein fulfills the notice requirements of the Bankruptcy Rules and is reasonably calculated under the circumstances to apprise both known and potential unknown creditors of the establishment of the Bar Date and the need to file a proof of claim, consistent with the due process rights of all parties under the standards established in Mullane v. Central Hannover Bank & Trust

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Co., 339 U.S. 306 (1950) and Hecht v. United Collection Bureau, Inc., 691 F.3d 218 (2d Cir. 2012). Accordingly, the Diocese is authorized and directed to serve and/or publish notice of the Bar Date in the manner described herein.

22. Nothing contained in this Order is intended or should be construed as a finding as to the validity of any claim against the Diocese, and all parties retain all rights to dispute any claim on any grounds. All parties retain the right to dispute, or to assert offsets or defenses to, any claim (whether or not reflected on the Schedules or any amendments thereto) as to amount, liability, classification, or otherwise, and to subsequently designate any claim as contingent, unliquidated or disputed.

23. The Court retains jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation and/or enforcement of this Order.

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**
Caption in Compliance with D.N.J. LBR 9004-1(b)

**McMANIMON, SCOTLAND
& BAUMANN, LLC**
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*Counsel for The Diocese of Camden, New Jersey,
Chapter 11 Debtor and Debtor-in-Possession*

In re:	Chapter 11
THE DIOCESE OF CAMDEN, NEW JERSEY,	Case No. 20-21257 (JNP)
Debtor.	Hearing Date and Time: January 27, 2021 at 10:00 a.m.

**ORDER ESTABLISHING DEADLINE FOR FILING
PROOFS OF CLAIM AND APPROVING THE FORM AND
MANNER OF NOTICE THEREOF**

The relief set forth on the following pages, numbered two (2) through seventeen (17), be and hereby is **ORDERED**.

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THIS MATTER is before this Court upon the motion (the “Motion”)¹ of The Diocese of Camden, New Jersey, the debtor and debtor-in-possession (the “Diocese”) in this chapter 11 case (the “Chapter 11 Case”) requesting entry of an order: (a) establishing deadlines to file proofs of claim against the Diocese, including but not limited to, claims arising under section 503(b)(9) of the Bankruptcy Code, (b) approving the form and manner of notice of the Bar Date (defined below), (c) authorizing the Diocese to publish notice of the Bar Date, and (d) granting related relief; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Standing Order of Reference to the Bankruptcy Court Under Title 11* of the United States District Court for the District of New Jersey, as amended on September 18, 2012; and venue being proper in this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and notice of the Motion being sufficient under the circumstances; and it appearing that no other or further notice need be provided; and the Official Committee of Tort Claimant Creditors (the “Committee”) and certain other parties having objected to the Motion; and the Court having held a hearing on the Motion on January 27, 2021; and the Court having issued an oral opinion on February 5, 2021; and the Court having determined that the relief sought in the Motion, as modified by this Order, is in the best interests of the Diocese, its estate and creditors; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED AS FOLLOWS:

1. The Motion is **GRANTED** as set forth herein.

¹ Capitalized terms used but not defined herein shall have the same meaning ascribed to such terms in the Motion.

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A. Approval of Proof of Claim Forms

2. The General Proof of Claim Form, in the form annexed hereto as **Exhibit A**, is hereby approved.
3. The Proof of Claim Form asserting Survivor Claims (the “Survivor Proof of Claim”), in the form substantially similar to the form attached as **Exhibit B**, is hereby approved.

B. Claims Bar Date

4. **June 30, 2021 at 11:59 p.m. (prevailing Eastern time)** (the “Bar Date”) is the deadline by which all persons and entities must file prepetition claims in this Chapter 11 Case, including, but not limited to: (i) a claim related to sexual abuse committed by any person connected with the Diocese; (ii) any claims under 11 U.S.C. § 503(b)(9); and (iii) all governmental units (as defined in section 101(27) of the Bankruptcy Code) (“Governmental Units”). For purposes of this Order, a “Survivor Claim” and a “Survivor Claimant” is as defined in the Survivor Proof of Claim Form (annexed hereto as Exhibit B).

C. Who Must File a Proof of Claim and Consequences for Failure To Do So

5. **Except as set forth otherwise herein, the following persons or entities must file a proof of claim on or before the Bar Date:**

- a. Any person or entity who believes its prepetition claim was omitted from the Diocese’s Schedules of Assets and Liabilities (as amended) filed in this Chapter 11 Case (the “Schedules”), or whose prepetition claim is listed in the Schedules, but is designated as being “contingent,” “unliquidated,” or “disputed,” and who may be entitled to any distributions to creditors that may be made in this Chapter 11 Case.
- b. Any person or entity who believes that its prepetition claim is improperly classified in the Schedules or is listed in an incorrect amount and that desires

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to have its claim allowed in a classification or amount other than as identified in the Schedules.

- c. Any Survivor Claimant who wishes to assert a Survivor Claim against the Diocese, regardless of whether such person has previously filed a lawsuit against the Diocese or otherwise has given formal or informal notice of such claims to the Diocese, including any person whose claim may be barred by a statute of limitations or repose in effect as of the Bar Date.

6. **The following persons or entities are not required to file proofs of claim at this time:**

- a. Any person or entity that has already properly filed a proof of claim against the Diocese with the Clerk of the Court for the United States Bankruptcy Court for the District of New Jersey, except that, any person who has asserted a Survivor Claim must submit a completed Survivor Proof of Claim;
- b. Any person or entity: (a) whose claim is listed in the Schedules or any amendments thereto; and (b) whose claim is not identified therein as “contingent,” “unliquidated,” or “disputed,” and (c) who does not dispute the amount or classification of its claim as set forth in the Schedules;
- c. Any professionals retained by: (i) the Diocese; (ii) the Committee; (iii) the Official Committee of Unsecured Trade Creditors (the “Trade Committee”); and (iv) any other committee appointed by the Office of the United States Trustee pursuant to orders of this Court, who assert administrative claims for payment of fees and expenses subject to the Court’s approval, pursuant to sections 330, 331(a) and 503(b) of the Bankruptcy Code;
- d. Any person or entity that asserts an administrative expense claim against the Diocese pursuant to sections 503(b) or 507(a)(2) of the Bankruptcy Code;
- e. Any person or entity whose claim against the Diocese is allowed by an order of the Court entered on or before the Bar Date; and
- f. Any person or entity whose claim has been previously settled or paid in full or released.

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7. Any person or entity who is required to file a proof of claim pursuant to this Order but fails to do so on or before the applicable Bar Date (i) shall not be treated as a creditor with respect to such Claim and shall not be entitled to vote to accept or reject, or to share in any distribution under, any Chapter 11 plan proposed and/or confirmed in this Chapter 11 Case; and (ii) **shall be forever barred, estopped, and enjoined from asserting such Claim against the Diocese, and the Diocese and its property shall be forever discharged from any and all indebtedness or liability with respect to such Claim.**

8. Notwithstanding anything to the contrary in this Order and subject to Bankruptcy Rule 9006, a Survivor Claimant whose Survivor Claim has not yet accrued pursuant to N.J.S.A 2A:14-2, S.477, 218th Leg., 2d Ann. Sess. (N.J. 2019) is not subject to the provisions of paragraph 7.

9. For the avoidance of doubt, nothing contained in this Order shall preclude a claimant from seeking relief from the Court to file a late-filed claim in accordance with Bankruptcy Rule 9006.

10. The filing of a Survivor Proof of Claim shall not constitute a waiver of the claimant's right to a jury trial, if any.

D. Filing a Proof of Claim

11. **Proofs of claim may not be filed with the Court or with the Clerk of the Court. Instead, all proofs of claim must be submitted to Prime Clerk, the Diocese's Claims and Noticing Agent ("Prime Clerk"), as set forth in paragraphs 12 and 13 below.**

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12. All claimants, except for those asserting Survivor Claims, shall submit their proof of claim using the General Proof of Claim Form, a copy of which is attached hereto as **Exhibit A**. In order to be considered valid, each General Proof of Claim submitted in this Chapter 11 Case must: (a) be written in English, (b) be denominated in lawful currency of the United States as of the Petition Date, (c) have attached copies of any writings upon which the claim is based in accordance with Bankruptcy Rules 3001(c) and 3001(d) (including for secured claims, evidence that the security interest has been perfected) unless such writings are voluminous or confidential, in which case a summary must be attached or an explanation provided as to why such writings are not available and such writings will be provided to the Diocese, the Committee and/or the Trade Committee upon request, and (d) be actually received by Prime Clerk on or before the Bar Date. Proofs of claim may be filed (i) electronically using the interface available on Prime Clerk's website at <https://cases.primeclerk.com/camdendiocese/EPOC-Index>, or (ii) by mail, overnight courier, or hand delivery to Prime Clerk's address. Proofs of claim sent by facsimile, telecopy, or e-mail will not be accepted. In the event that a completed General Proof of Claim is mailed to or personally delivered to the Clerk of the Court for the United States Bankruptcy Court for the District of New Jersey, the Clerk of the Court is directed to mark the Proof of Claim with the date and time of receipt, place the Proof of Claim Form in a sealed envelope, and transmit the sealed envelope to Prime Clerk at the address for receipt of General Proofs of Claim Forms above.

13. All claimants asserting Survivor Claims shall submit their proof of claim using the Survivor Proof of Claim Form, a copy of which is attached hereto as **Exhibit B**. In order to be considered valid, each Survivor Proof of Claim must: (a) be written in English or include a

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translation to English, (b) contain responses to substantially all requests for information set forth therein to the best of the Survivor Claimant's knowledge at the time the form is signed, (c) be signed by the Survivor Claimant or its attorney or if such Survivor Claimant is a minor, legally incapacitated, or deceased, by such Survivor Claimant's parent, legal guardian or executor, and (d) be actually received by Prime Clerk on or before the Bar Date. Proofs of claim may be filed (i) electronically using the interface available at <https://cases.primeclerk.com/camdendiocese/EPOC-Index>, or (ii) by mail, overnight courier, or hand delivery to Prime Clerk's address. Proofs of claim sent by facsimile, telecopy, or e-mail will not be accepted. In the event that a completed Survivor Proof of Claim is mailed to or personally delivered to the Clerk of the Court for the United States Bankruptcy Court for the District of New Jersey, the Clerk of the Court is directed to mark the Survivor Proof of Claim with the date and time of receipt, place the Survivor Proof of Claim in a sealed envelope, and transmit the sealed envelope to Prime Clerk at the address for receipt of Survivor Proofs of Claim above. A Survivor Claim may only be made on account of Abuse of an individual. Any other claim shall be asserted as a General Claim.

14. If a claimant submits a timely proof of claim that asserts or appears to assert a Survivor Claim on a document that is not a Survivor Proof of Claim Form, such claim will be treated as timely filed only if such claimant submits a completed Survivor Proof of Claim as of the later of the Bar Date and the date which is thirty days following written notice by the Diocese to such Survivor Claimant from the Diocese of the need to complete and submit a Survivor Proof of

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Claim. The Diocese shall provide a copy of such notice to the Committee at the same time the notice is sent to the claimant.

E. Confidentiality Protocol

15. Due to the sensitive nature of the information requested in the Survivor Proof of Claim Form, the following confidentiality protocol (“Confidentiality Protocol”) shall apply to all Survivor Proofs of Claim (and General Proofs of Claim that assert or appear to assert a Survivor Claim) submitted by Survivor Claimants. Notwithstanding anything herein to the contrary, the following Confidentiality Protocol and the Confidentiality Agreement (defined below) are for the sole protection of Survivor Claimants and as set forth in more detail in the Confidentiality Agreement, the facts and details of the alleged abuse along with the name of the alleged clergy or agent(s) of the Diocese involved are not deemed confidential.

- (i) All claimants asserting a Survivor Claim shall submit such claims directly to Prime Clerk, the Diocese’s Claims and Noticing Agent, using the Survivor Proof of Claim Form. Such claims should not be filed with the Court.
- (ii) Survivor Proofs of Claim received by Prime Clerk shall be treated as confidential and will be made available only to Authorized Parties (as defined below) unless a Survivor Claimant affirmatively elects to have their Survivor Proof of Claim disclosed publicly. Any claim that appears to be a Survivor Claim that is filed as a General Claim shall be treated by Prime Clerk as a confidential claim pending resolution of the claimant’s intent regarding confidential treatment of such claim. The Confidentiality Protocol is for the sole and exclusive benefit of the Survivor Claimants. Accordingly, any Survivor Claimant may elect to make information contained in his or her personal Survivor Proof of Claim public, even if he or she does not elect to have his or her personal Survivor Proof of Claim disclosed publicly. For the avoidance of doubt, Survivor Claimants are not bound by the confidentiality provisions of this Order with respect to

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disclosures regarding their own Abuse or any information disclosed by a Survivor Claimant in his or her Survivor Claim.

- (iii) Survivor Proofs of Claim received by Prime Clerk shall be held and treated as confidential by Prime Clerk, and copies thereof shall be provided or made available only to the following parties (the "Authorized Parties"):
- i. The Bishop of the Diocese, officers of the Diocese, and such other current or former employees of the Diocese who are necessary to assist the Diocese in reviewing and analyzing the Survivor Proofs of Claim. For the avoidance of doubt, any person that was disclosed to the Diocese as an individual who had allegedly committed an act of abuse, as well as any person identified as an alleged abuser in a Survivor Proof of Claim Form or who is otherwise acknowledged by the Diocese as someone who committed Abuse, shall not be an Authorized Person; *provided, however,* that the Diocese is authorized to discuss the contents of any Survivor Proof of Claim, (other than the claimant's name, address, the signature block and any other information which could reasonably be used to personally identify a Survivor Claimant or any witness to the abuse disclosed in the Survivor Proof of Claim Form), with a person identified as an alleged abuser who was not previously disclosed to the Diocese as an individual who had committed an act of abuse, *provided, further,* that if the Diocese seeks to disclose information that could reasonably be used to identify a Survivor Claimant or a witness identified in a Survivor Proof of Claim Form to an alleged abuser, the Diocese may do so upon written consent from the Committee and the Survivor Claimant. If the Committee does not consent, the Diocese may contact the Court to arrange a telephonic conference seeking such authorization upon no less than three (3) days' notice to the affected Survivor Claimant(s), the Committee and the Diocese;
 - ii. Counsel to the Diocese (including any special counsel or other counsel), counsel to the Committee, and counsel to the Trade Committee, including partners, counsel, associates, and employees of such counsel;
 - iii. Members of the Committee and their individual counsel (after the Survivor Proof of Claim has been redacted to remove the claimant's name, address, the signature block and any other information which

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could reasonably be used to personally identify a Survivor Claimant);

- iv. Any insurance company that provided insurance or reinsurance that may cover the claims described in any Survivor Proof of Claim, together with their respective successors, reinsurers, counsel, experts and consultants; *provided, however,* that the Diocese's insurers shall be provided with all Survivor Proof of Claim Forms alleging any abuse that occurred, even in part, during such insurer's policy periods, *provided further,* that access by the Diocese's insurers to Survivor Proof of Claim Forms alleging that abuse occurred wholly outside such insurer's policy periods shall be resolved at a later date, with nothing in this Order affecting such potential access;
- v. Any person appointed pursuant to an order of the Bankruptcy Court to serve as a mediator, as a representative for unknown or future claimants, or as a special arbitrator/claims reviewer appointed to review and resolve Survivor Claims, in this Chapter 11 Case or any adversary proceeding filed in this Chapter 11 Case;
- vi. 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;
- vii. Any person upon express written consent of the affected Survivor Claimant, *provided, however,* that if the Survivor Claimant filed his or her claim *pro se*, then consent of the Survivor Claimant and counsel to the Committee shall be obtained before disclosing such claimant's proof of claim to any person;
- viii. Any person with the express written consent of the Diocese and the Committee, upon 10 business days' notice to the affected Survivor Claimant(s) and the affected Survivor Claimant(s)' attorney, if known. A Survivor Claimant may file an objection with the Court concerning the disclosure of a Survivor Proof of Claim within the notice period;
- ix. Such other persons as the Court may authorize to access to one or more of the Survivor Proofs of Claim pursuant to subsequent order; *provided, however,* that any such determination shall be made on no

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less than 7 days' notice to the affected Survivor Claimant(s), the Committee and the Diocese;

- x. Counsel of record to any Authorized Party upon execution of a Confidentiality Agreement by such counsel;
 - xi. The Office of the United States Trustee. Paragraphs 15(iv) and 15(v) of this Order shall not apply to the U.S. Trustee; and
 - xii. Any party as ordered by the Court on no less than ten (10) days' notice to the Diocese and the Committee.
- (iv) Notwithstanding the designation of Authorized Parties above, no person or entity may obtain copies of any Survivor Proof of Claim prior to the execution of a confidentiality agreement substantially in the form attached hereto as **Exhibit C** (the "Confidentiality Agreement"); *provided, however* that a mediator appointed in the case shall not be required to execute a confidentiality agreement if such mediator is currently a Bankruptcy Judge, a District Court Judge, or a State Court Judge. Counsel of record to any Authorized Party shall only be required to execute a single Confidentiality Agreement, which shall be deemed binding on their entire firm. Access to the Survivor Proofs of Claim for all other Authorized Parties shall be restricted to the natural person who executes a Confidentiality Agreement, and a separate Confidentiality Agreement must be signed by each natural person seeking access to the Survivor Proofs of Claim on behalf of an Authorized Party. Copies of all Confidentiality Agreements shall be provided to the Diocese and the Committee through their respective counsel.
- (v) Authorized Parties in possession of any Survivor Proof(s) of Claim shall keep such Survivor Proof(s) of Claim confidential and shall not use or disclose any information provided in any Survivor Proof(s) of Claim except in accordance with the terms of this order, the Confidentiality Agreement or pursuant to an order of this Court, unless the Survivor Claimant has elected to make his or her Survivor Proof of Claim public by indicating such consent in the Survivor Proof of Claim Form. If an Authorized Party seeks to share information with a non-Authorized Party or contact a witness identified in a Survivor Proof of Claim Form based upon information obtained solely from the Survivor Proof of Claim Form, such Authorized Party must provide fourteen (14) days' notice (the "Notice Period") to: (i) the Survivor Claimant; (ii) the Survivor Claimant's counsel (if known); (iii)

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counsel for the Diocese; and (iv) counsel for the Committee. If an objection is made within the Notice Period, no disclosure of such information shall be made unless and until a decision is rendered by the Bankruptcy Court;

- (vi) Prime Clerk shall assign to each claimant asserting a Survivor Claim a unique identifier code and shall maintain a confidential list of the identities of the Survivor Claimants, their corresponding identifier code, and their respective Survivor Proof(s) of Claim. The confidential list of the identities of Survivor Claimants shall be provided only to such parties that are Authorized Parties entitled to the personally identifying information of Survivor Claimants pursuant to this Order.
- (vii) Survivor Proofs of Claim received by Prime Clerk, including any attachments thereto, shall not be made publicly available on the Diocese's case website and shall be redacted on the claims register. For the avoidance of doubt, only the claim number and claim amount will be made publicly available on the case website and only such information will be included in the publicly available claims register.

F. Exculpation

16. Notwithstanding anything herein to the contrary, Prime Clerk shall be exculpated from liability² for, and shall be under no obligation or duty to advise claimants and/or make determinations as to whether the appropriate proof of claim form was used; *provided however*, to the extent that a claimant seeks such advice, Prime Clerk shall refer the claimant to the instructions detailing the proof of claim forms in the Bar Date Notice and to Prime Clerk's proof of claim website for these cases at <https://cases.primeclerk.com/camdendiocese/>; *further provided, however*, that in no event shall Prime Clerk be exculpated in the case of its own bad faith, self-dealing, breach of fiduciary duty (if any), gross negligence or willful misconduct.

² Whenever Prime Clerk is acting on behalf of the Clerk of the Court, the exculpation provision in this Order shall also apply to the Clerk of the Court.

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G. Service of the Bar Date Notice

17. Within fifteen (15) days following entry of this Order, the Diocese shall serve by United States mail, first-class postage prepaid: (i) notice of the Bar Date, substantially in the form attached to this Order as **Exhibit D** and incorporated herein by reference (the “**Bar Date Notice**”); and (ii) a copy of the General Proof of Claim Form (together with the Bar Date Notice, the “**General Claim Notice Package**”), upon (a) the Office of the United States Trustee; (b) counsel to the Committee, counsel to the Trade Committee, and any other committee appointed in this case; (c) all entities who have filed a notice of appearance in the Diocese’s case; (d) all creditors listed in the Diocese’s Schedules (except those creditors listed on the portions of Schedule F filed under seal relating to Survivor Claimants); (e) all parties to executory contracts and unexpired leases of the Diocese; (f) all entities that have previously filed proofs of claim in the Diocese’s Chapter 11 Case; (g) any other entities or their counsel, including governmental units, known to the Diocese as entities who may reasonably be expected to have claims against the estate; and (h) such additional persons and entities as deemed appropriate by the Diocese.

18. Within fifteen (15) days following entry of this Order, the Diocese shall serve by United States mail, first-class postage prepaid: (i) the Bar Date Notice, (ii) a copy of this Order (without exhibits or schedules), and (iii) a Survivor Proof of Claim Form (together with the Bar Date Notice and this Order, the “**Survivor Claim Notice Package**”), upon each person, or their respective counsel, who, (a) is listed on that portion of the Diocese’s Schedule F filed under seal, or (b) to the knowledge of the Diocese as determined after a review of the Diocese’s books and records has (1) filed, or threatened to file, a lawsuit against the Diocese alleging that such Survivor

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Claimant was subjected to Abuse by an individual for whom the Diocese was allegedly responsible; (2) otherwise contacted the Diocese to report that they were subjected to Abuse by an individual for whom the Diocese was allegedly responsible, whether or not that individual's claim was considered to be substantiated and whether or not the report was written or verbal, in either case where contact information for such person or his or her attorney is included in the Diocese's books and records; (3) been identified to the Diocese as an individual who was subjected to Abuse by an individual for whom the Diocese was allegedly responsible to the extent contact information for such person or his or her attorney is included in the Diocese's books and records; or (4) previously filed a proof of claim in the Diocese's Chapter 11 Case asserting a claim based on Abuse. The Survivor Claim Notice Package shall also be served upon (a) the Office of the United States Trustee; (b) counsel to the Committee; (c) counsel to the Trade Committee; and (d) any other committee appointed in this case. Notwithstanding the foregoing, the Diocese shall not be required to send a Survivor Claim Notice Package to any person who has previously entered into a settlement with the Diocese regarding a claim based on Abuse if the Diocese has performed all of its obligations under the terms of such settlement.

19. In addition to providing direct notice to known creditors as set forth above, subject to applicable publication guidelines and submission deadlines, the Diocese shall cause a notice in substantially the form attached hereto as Exhibit E (the "Publication Notice") to be published as follows: (i) three times in a national edition of the *New York Times*, *USA Today*, or the *Wall Street Journal*, with the first publication as soon as practicable, the second publication no later than April 15, 2021, and the third publication no later than June 7, 2021; and (ii) twice in *The Philadelphia*

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Inquirer, The Courier-Post, South Jersey Times, The Daily Journal, The Press of Atlantic City, and The Cape May County Herald, with the first publication no later than sixty (60) prior to the Bar Date and the second publication no later than thirty (30) days prior to the Bar Date.

20. In addition to the foregoing publication, the Diocese shall use reasonable best efforts to take the following additional measures to disseminate information relating to the Bar Date as soon as practicable following entry of this Order:

(i) Beginning within fifteen (15) days of the Bar Date Order and at least through the Bar Date, the Diocese will cause prominent, one-click links to the General Claim Notice Package and the Survivor Claim Notice Package to be posted on the case management website maintained by Prime Clerk.

(ii) The Diocese will establish and maintain, or cause Prime Clerk to establish and maintain, a telephone number which may be used by claimants to ask questions or to request copies of the General Claim Notice Package, the Survivor Claim Notice Package, or parts thereof;

(iii) Beginning within fifteen (15) days of the Bar Date Order and at least through the Bar Date, the Diocese will cause links to the General Claim Notice Package and the Survivor Claims Notice Package to be posted on the Diocese's website homepage. In addition, the Diocese will cause links to the General Claim Notice Package and the Survivor Claims Notice Package to be posted every thirty (30) days on the home page for <https://catholicstarherald.org/>.

(iv) Beginning within fifteen (15) days of the Bar Date Order and until the Survivor Claim Bar Date, the Diocese will cause links to the General Claim Notice Package and the Survivor Claims Notice Package to be posted on its Facebook and Twitter account in a pinned posting, and, to such posting shall provide one-click links to the General Proof of Claim Form and the Survivor Proof of Claim Form. The Diocese's Facebook and Twitter accounts shall be updated every thirty (30) days between now and the Bar Date by posting one-click links to the General Proof of Claim Form and the Survivor Proof of Claim Form.

(v) Beginning within fifteen (15) days of the Bar Date Order and until the Bar Date, the Diocese will cause, to the Diocese's reasonable best efforts, the Survivor Claims Notice Package to be posted on a Facebook or Twitter account maintained by any Parish of the Diocese in a pinned posting and/or in a Parish bulletin.

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(vi) Within fifteen (15) days of entry of the Bar Date Order, the Diocese will issue a press release regarding the Bar Date and including the Bar Date Notice to the news departments of the following newspapers: *The Philadelphia Inquirer*, *The Courier-Post*, *South Jersey Times*, *The Daily Journal*, *The Press of Atlantic City* and *The Cape May County Herald*.

(vii) Beginning within fifteen (15) days of the Bar Date Order through the Bar Date, the Diocese will cause a copy of the Publication Notice to be read on KYW News Radio.

(viii) The Diocese will mail a copy of the Publication Notice to each parish and ministry (except primary and secondary schools) affiliated with the Diocese with a request to display the Publication Notice in a prominent place until expiration of the Bar Date.

(ix) The Diocese will place a copy of the Publication Notice in each edition of the *Catholic Star Herald* until the Bar Date.

(x) The Diocese will mail a copy of the Bar Date Notice to the following on the Diocese's stationary and shall request that the party post the Bar Date Notice in a prominent place until the expiration of the Bar Date:

- i. the Attorney General of the State of New Jersey; and
- ii. For each of the counties of Atlantic, Camden, Cape May, Cumberland, Gloucester, and Salem:
 1. the prosecutor's office;
 2. sheriff's office;
 3. at least one public health agency in each county; and
 4. at least one substance abuse agency or hospital (if any).

21. The Court finds that the form and manner of giving notice of the Bar Date as approved herein fulfills the notice requirements of the Bankruptcy Rules and is reasonably calculated under the circumstances to apprise both known and potential unknown creditors of the establishment of the Bar Date and the need to file a proof of claim, consistent with the due process rights of all parties under the standards established in Mullane v. Central Hannover Bank & Trust

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Debtor: The Diocese of Camden, New Jersey

Case No.: 20-21257 (JNP)

Caption of Order: Order Establishing Deadline for Filing Proofs of Claim and Approving the Form and Manner of Notice Thereof

Co., 339 U.S. 306 (1950) and Hecht v. United Collection Bureau, Inc., 691 F.3d 218 (2d Cir. 2012). Accordingly, the Diocese is authorized and directed to serve and/or publish notice of the Bar Date in the manner described herein.

22. Nothing contained in this Order is intended or should be construed as a finding as to the validity of any claim against the Diocese, and all parties retain all rights to dispute any claim on any grounds. All parties retain the right to dispute, or to assert offsets or defenses to, any claim (whether or not reflected on the Schedules or any amendments thereto) as to amount, liability, classification, or otherwise, and to subsequently designate any claim as contingent, unliquidated or disputed.

23. The Court retains jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation and/or enforcement of this Order.

Exhibit A

General Proof of Claim

Fill in this information to identify the case (Select only one Debtor per claim form):

Debtor: The Diocese of Camden, New Jersey

Case Number: 20-21257

Modified Official Form 410

Proof of Claim

04/19

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 (other than a claim entitled to priority under 11 U.S.C. § 503(b)(9)). 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.

IF YOU ARE ASSERTING A CLAIM OF ABUSE, DO NOT USE THIS FORM. INSTEAD, USE THE SURVIVOR PROOF OF CLAIM FORM.

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 _____

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?	<input type="checkbox"/> No <input type="checkbox"/> 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? <input type="checkbox"/> No <input type="checkbox"/> 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 creditcard. 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?	<input type="checkbox"/> No <input type="checkbox"/> Yes. The claim is secured by a lien on property. Nature of property: <input type="checkbox"/> Real estate. If the claim is secured by the debtor's principal residence, file a <i>Mortgage Proof of Claim Attachment</i> (Official Form 410-A) with this <i>Proof of Claim</i> . <input type="checkbox"/> Motor vehicle <input type="checkbox"/> 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) _____ % <input type="checkbox"/> Fixed <input type="checkbox"/> Variable
10. Is this claim based on a lease?	<input type="checkbox"/> No <input type="checkbox"/> Yes. Amount necessary to cure any default as of the date of the petition. \$_____
11. Is this claim subject to a right of setoff?	<input type="checkbox"/> No <input type="checkbox"/> Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?	<input type="checkbox"/> No <input type="checkbox"/> Yes. Check one:	
A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.	<input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B). \$ _____	
	<input type="checkbox"/> Up to \$3,025* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7). \$ _____	
	<input type="checkbox"/> Wages, salaries, or commissions (up to \$13,650*) 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). \$ _____	
	<input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8). \$ _____	
	<input type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5). \$ _____	
	<input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)() that applies. \$ _____	
<small>* Amounts are subject to adjustment on 4/01/22 and every 3 years after that for cases begun on or after the date of adjustment.</small>		
13. Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9)?	<input type="checkbox"/> No <input type="checkbox"/> Yes. Indicate the amount of your claim arising from the value of any goods received by the Debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim. \$ _____	

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

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 _____

Modified Official Form 410

Instructions for Proof of Claim

United States Bankruptcy Court

12/15

These instructions and definitions generally explain the law. In certain circumstances, such as bankruptcy cases that debtors do not file voluntarily, exceptions to these general rules may apply. You should consider obtaining the advice of an attorney, especially if you are unfamiliar with the bankruptcy process and privacy regulations.

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.

How to fill out this form

- Fill in all of the information about the claim as of the date the case was filed.
- Fill in the caption at the top of the form.
- If the claim has been acquired from someone else, then state the identity of the last party who owned the claim or was the holder of the claim and who transferred it to you before the initial claim was filed.
- Attach any supporting documents to this form.
Attach redacted copies of any documents that show that the debt exists, a lien secures the debt, or both. (See the definition of *redaction* on the next page.)
Also attach redacted copies of any documents that show perfection of any security interest or any assignments or transfers of the debt. In addition to the documents, a summary may be added. Federal Rule of Bankruptcy Procedure (called “Bankruptcy Rule”) 3001(c) and (d).
- Do not attach original documents because attachments may be destroyed after scanning.
- If the claim is based on delivering health care goods or services, do not disclose confidential health care information. Leave out or redact confidential information both in the claim and in the attached documents.

- A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, individual’s tax identification number, or financial account number, and only the year of any person’s date of birth. See Bankruptcy Rule 9037.
- For a minor child, fill in only the child’s initials and the full name and address of the child’s parent or guardian. For example, write *A.B., a minor child (John Doe, parent, 123 Main St., City, State)*. See Bankruptcy Rule 9037.

Confirmation that the claim has been filed

To receive confirmation that the claim has been filed, enclose a stamped self-addressed envelope and a copy of this form. You may view a list of filed claims in this case by visiting the Claims and Noticing Agent’s website at http://cases.primeclerk.com/camden_diocese.

Understand the terms used in this form

Administrative expense: Generally, an expense that arises after a bankruptcy case is filed in connection with operating, liquidating, or distributing the bankruptcy estate.
11 U.S.C. § 503.

Claim: A creditor’s right to receive payment for a debt that the debtor owed on the date the debtor filed for bankruptcy.
11 U.S.C. §101 (5). A claim may be secured or unsecured.

Claim Pursuant to 11 U.S.C. §503(b)(9): A claim arising from the value of any goods received by the Debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of the Debtor's business. Attach documentation supporting such claim.

Creditor: A person, corporation, or other entity to whom a debtor owes a debt that was incurred on or before the date the debtor filed for bankruptcy. 11 U.S.C. §101 (10).

Debtor: A person, corporation, or other entity who is in bankruptcy. Use the debtor's name and case number as shown in the bankruptcy notice you received. 11 U.S.C. § 101 (13).

Evidence of perfection: Evidence of perfection of a security interest may include documents showing that a security interest has been filed or recorded, such as a mortgage, lien, certificate of title, or financing statement.

Information that is entitled to privacy: A *Proof of Claim* form and any attached documents must show only the last 4 digits of any social security number, an individual's tax identification number, or a financial account number, only the initials of a minor's name, and only the year of any person's date of birth. If a claim is based on delivering health care goods or services, limit the disclosure of the goods or services to avoid embarrassment or disclosure of confidential health care information. You may later be required to give more information if the trustee or someone else in interest objects to the claim.

Priority claim: A claim within a category of unsecured claims that is entitled to priority under 11 U.S.C. §507(a). These claims are paid from the available money or property in a bankruptcy case before other unsecured claims are paid. Common priority unsecured claims include alimony, child support, taxes, and certain unpaid wages.

Proof of claim: A form that shows the amount of debt the debtor owed to a creditor on the date of the bankruptcy filing. The form must be filed in the district where the case is pending.

Redaction of information: Masking, editing out, or deleting certain information to protect privacy. Filers must redact or leave out information entitled to **privacy** on the *Proof of Claim* form and any attached documents.

Secured claim under 11 U.S.C. §506(a): A claim backed by a lien on particular property of the debtor. A claim is secured to the extent that a creditor has the right to be paid from the property before other creditors are paid. The amount of a secured claim usually cannot be more than the value of the particular property on which the creditor has a lien. Any amount owed to a creditor that is more than the value of the property normally may be an unsecured claim. But exceptions exist; for example, see 11 U.S.C. § 1322(b) and the final sentence of 1325(a).

Examples of liens on property include a mortgage on real estate or a security interest in a car. A lien may be voluntarily granted by a debtor or may be obtained through a court proceeding. In some states, a court judgment may be a lien.

Setoff: Occurs when a creditor pays itself with money belonging to the debtor that it is holding, or by canceling a debt it owes to the debtor.

Unsecured claim: A claim that does not meet the requirements of a secured claim. A claim may be unsecured in part to the extent that the amount of the claim is more than the value of the property on which a creditor has a lien.

Offers to purchase a claim

Certain entities purchase claims for an amount that is less than the face value of the claims. These entities may contact creditors offering to purchase their claims. Some written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court, the bankruptcy trustee, or the debtor. A creditor has no obligation to sell its claim. However, if a creditor decides to sell its claim, any transfer of that claim is subject to Bankruptcy Rule 3001(e), any provisions of the Bankruptcy Code (11 U.S.C. § 101 et seq.) that apply, and any orders of the bankruptcy court that apply.

Please send completed Proof(s) of Claim to:

The Diocese of Camden, New Jersey Claims Processing Center
c/o Prime Clerk LLC
850 3rd Avenue, Suite 412
Brooklyn, NY 11232

Do not file these instructions with your form

Exhibit B

Survivor Proof of Claim Form

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:)
THE DIOCESE OF CAMDEN, NEW JERSEY,) Case No. 20-21257 (JNP)
Debtor.) Chapter 11
)
)

SEXUAL ABUSE SURVIVOR PROOF OF CLAIM

**THIS COMPLETED FORM MUST BE RECEIVED NO LATER THAN
JUNE 30, 2021 AT 11:59 P.M. (EASTERN TIME)**

DO NOT FILE THIS DOCUMENT WITH THE COURT

This Sexual Abuse Survivor Proof of Claim (this “**Survivor Proof of Claim**”) must be received no later than **11:59 p.m. (Eastern Time) on June 30, 2021** (the “**Bar Date**”). Please carefully read the following instructions included with this Survivor Proof of Claim and complete all applicable questions to the extent of your knowledge or recollection.

If you do not know the answer to an open-ended question, you can write “I don’t know” or “I don’t recall” if either is the case. If a question does not apply, please write “N/A.” If you are completing this form in hard copy, please write or type clearly using blue or black ink.

Claims properly filed in accordance with these instructions may later be amended to, among other things, supplement, modify, correct, or clarify the information provided herein by properly filing a subsequent Survivor Proof of Claim and referring back to the originally filed claim.

To file this Survivor Proof of Claim, it must be actually received by Prime Clerk, the claims and noticing agent (the “**Claims Agent**”) for The Diocese of Camden, New Jersey (the “**Diocese**” or the “**Debtor**”) by either filing it:

- (i) electronically using the interface available at:
<https://cases.primeclerk.com/camdendiocese/EPOC-Index>; or
- (ii) mail, overnight courier, or hand delivery to Prime Clerk at: The Diocese of Camden, New Jersey Claims Processing Center, c/o Prime Clerk LLC, 850 3rd Avenue, Suite 412, Brooklyn, NY 11232.

Survivor Proofs of Claim sent by any other means (such as facsimile transmission or email, or through a different manner than described in (i) and (ii) above) **will not** be accepted.

You May Consult An Attorney Regarding This Matter.

Failure To Timely Complete And Return This Form by the Bar Date May Result In Your Inability To Vote on a Plan of Reorganization and Receive a Distribution in the above-captioned Chapter 11 Case.

“**You**” and/or “**Survivor Claimant**” refers to the person asserting a Survivor Claim against the Diocese related to the Survivor Claimant’s sexual abuse.

For this claim to be valid, the Survivor Claimant, or his/her attorney must sign this form. If the Survivor Claimant is deceased or incapacitated, the form must be signed by the Survivor Claimant’s representative or the attorney for the Survivor Claimant’s estate.

If the Survivor Claimant is a minor, the form must be signed by the survivor’s parent, legal guardian, or attorney. Any Survivor Proof of Claim signed by a representative or legal guardian must attach documentation establishing such person’s authority to sign the claim for the Survivor Claimant.

Who Should File a Survivor Claimant Proof of Claim?

This Survivor Proof of Claim is only for people who have experienced sexual abuse (defined below) on or before the date the Debtor’s filed for bankruptcy protection, October 1, 2020. This Survivor Proof of Claim is the manner and process through which you can make a claim against the Diocese based on sexual abuse. Any person making a claim based on anything other than sexual abuse should file a General Proof of Claim (Official Bankruptcy Form 410).

Who Is a Survivor?

The term Survivor refers to a person who experienced sexual abuse, as defined below.

What is Sexual Abuse?

For the purposes of this Survivor Proof of Claim, a “**Survivor Claim**” is any claim (as defined in section 101(5) of the Bankruptcy Code) against the Diocese resulting or arising in whole or in part, directly or indirectly from any actual or alleged sexual conduct or misconduct, sexual abuse or molestation, indecent assault and/or battery, rape, pedophilia, ephebophilia, or sexually-related physical, sexually-related psychological, or sexually related emotional harm, or contacts, or interactions of a sexual nature between a child and an adult, or an adult and another adult regardless of whether consensual or nonconsensual, sexual assault, sexual battery, sexual psychological or emotional abuse, humiliation, or intimidation, or any other conduct constituting a sexual offense of any type, kind, nature or description, incest, or use of a child in a sexual performance, and seeking monetary damages or any other relief, under any theory of liability, including vicarious liability, any negligence-based theory, 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 was allegedly responsible.

“Sexual abuse” is defined as an act of sexual contact or sexual penetration between a child under the age of 18 years and an adult.

- a. **“Sexual contact”** means an intentional touching by the victim or actor, either directly or through clothing, of the victim’s or actor’s intimate parts for the purpose of sexually arousing or sexually gratifying the actor. Sexual contact of the adult with himself must be in view of the victim whom the adult knows to be present.
- b. **“Sexual penetration”** means vaginal intercourse, cunnilingus, fellatio, digital penetration, or anal intercourse between persons or insertion of the hand, finger or object into the anus or vagina either by the adult or upon the adult's instruction.
- c. **“Intimate parts”** means the following body parts: sexual organs, genital area, anal area, inner thigh, groin, buttock or breast of a person.
- d. **“Injury or illness”** includes psychological injury or illness, whether or not accompanied by physical injury or illness.

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

You May Wish to Consult an Attorney Regarding This Matter.

You may also obtain information from the Claims Agent by: (1) calling toll free at 1 (877) 465-8420 or (2) visiting the case website at <https://cases.primeclerk.com/camden-diocese/Home-SubmitInquiry> to submit an inquiry or chat with a live representative (do not contact the Claims Agent for legal advice).

You may also obtain information from counsel for the Official Committee of Tort Claimant Creditors of The Diocese of Camden, New Jersey (the “**Committee**”), Lowenstein Sandler LLP, by sending an email to DOCAbuseClaims@lowenstein.com.

Penalty for presenting fraudulent claim: Fine of up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157 and 3571.

PART 1: CONFIDENTIALITY

Unless you indicate below, your identity and this Survivor Proof of Claim, will be kept **confidential** under seal, and outside the public record. However, information in this Survivor Proof of Claim will be confidentially provided, pursuant to Court-approved guidelines, to such persons necessary to adjudicate the claim under Section 502 of the Bankruptcy Code including the Debtor, the Committee, the Office of the United States Trustee, any unknown claims representative appointed in the bankruptcy case, insurers of the Diocese including authorized claims administrators of such insurers and their reinsurers, and each of the respective counsel, retained advisors and experts of the foregoing persons and any special arbitrator, mediator, or claims reviewer appointed to review and resolve Survivor Proof of Claims, as trustee, or functional equivalent thereof, appointed to administer payments to holders of Survivor Proof of Claims, and confidentially to such other persons that the Court determines need the information in order to evaluate the claim. Information in this Survivor Proof of Claim may be required to be disclosed to governmental authorities under mandatory reporting laws in many jurisdictions.

This Survivor Proof of Claim (along with any accompanying exhibits and attachments) will be maintained as confidential as indicated above unless you expressly request that it be publicly available by checking the “public” box and signing below.

PUBLIC: I want my identity and this Survivor Proof of Claim (together with any exhibits and attachments) to be made part of the official claims register in this case. **My claim may be available for review by any and all members of the public.**

Signature: _____

Print Name: _____

PART 2: IDENTIFYING INFORMATION

A. Identity of Survivor

First Name _____ Middle Initial _____ Last Name _____ Jr/Sr/III _____

Mailing Address (If Survivor Claimant is incapacitated, is a minor, or is deceased, provide the address of the individual submitting the claim. If you are in jail or prison, provide the address of your place of incarceration):

Number and Street:				
City:		State:		Zip Code:
Country (not USA):		Email Address:		
Telephone (Home):		Telephone (Cell):		
Attorney Email:		Attorney Phone:		

For communications regarding this claim you may use (check the appropriate boxes):

Email US Mail Home Voicemail Cell Voicemail Counsel listed below

Social Security Number of Survivor Claimant (last four digits only): XXX-XX-_____

If the Survivor Claimant is in jail or prison, provide the Survivor Claimant's identification number

Birthdate of Survivor Claimant (only the month and year): (MM/YYYY): _____ / _____

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

Gender of Survivor Claimant: Male Female Other
(specify) _____

B. If you have hired an attorney relating to the sexual abuse described in this Survivor Proof of Claim, please provide his or her name and contact information

Law Firm Name:				
Attorney's Name:				
Number and Street:				
City:		State:		Zip Code:
Country (not USA):		Email Address #1:		
Telephone (Work):		Email Address #2:		
Telephone (Cell):		Fax No.:		

PART 3: NATURE OF THE SEXUAL ABUSE

(Attach additional sheets if necessary)

For each of the questions listed below, please complete your answers to the best of your recollection.

Note: If you have previously filed a lawsuit about your sexual abuse in state or federal court, you must attach a copy of the complaint. If you have not filed a lawsuit, or if the complaint does not contain all of the information requested below, you must provide the information below to the extent of your recollection.

Please answer each of the following questions as best you are able. **If you do not know or recall an answer, you may indicate that you do not know or recall the answer and move on to the next question.**

- A. Were you sexually abused by more than one person? Yes No
- B. Please identify each person who sexually abused you. If you do not remember the name of the sexual abuser(s), provide as much information about the individual that you recall and their relationship to the Diocese. What was the sexual abuser's position, title, or role?

- C. How were you introduced to your abuser? (if you know):

- D. Where did the sexual abuse occur? Please be as specific as possible and provide all relevant information that you recall including the City and State, name of the religious Parish, School, or Orphanage (if applicable). Did it occur in more than one location? If so, please be as specific as possible and provide all relevant information that you recall including the City and State, names of religious Parish or School or Orphanage (if applicable) of any other locations.

- E. When did the first act of sexual abuse take place? If you do not remember the calendar date, approximately what season of the year was it (spring, summer, fall, winter), approximately what age were you when it started, and, if applicable, what

school grade were you in at the time?

—
—
—

F. Approximately how frequently were you sexually abused?

G. If the sexual abuse took place on more than one date, please state approximately how many times it occurred and when it stopped. If you were sexually abused by more than one sexual abuser, indicate when the sexual abuse by each of the sexual abusers started and stopped. If you do not remember the calendar date, approximately what season of the year was it (spring, summer, fall, winter), approximately what age were you when it started and stopped, and, if applicable, what school grade(s) were you in at the time?

H. **NARRATIVE SUMMARY:** Please describe the sexual abuse in as much detail as you can recall in the lines below. You may attach additional pages if needed.

I. Did you, or did anyone you know of on your behalf, tell anyone about the sexual abuse when you were a child, including parents, family members, a friend, anyone affiliated with the Diocese, Parish, School, or Orphanage, law enforcement, including the district attorney's office, police department, or investigators, the Diocese's Victim Assistance Coordinator, Office of Children and Youth Protection, Victim Compensation Program or other similar Diocesan program?

Yes No

If so, what was the date you reported the abuse? Who did you tell?

- J. Are you aware of anyone who knew about the sexual abuse committed against you, or the sexual abuser committing sexual abuse against other children?

Yes No

If your answer is “Yes”, can you describe who they were and how they knew about the abuse?

- K. Were you harmed in any way, directly or indirectly, by actions taken by the Diocese after the abuse? If so, please describe:

- a. What happened:

- b. When it happened:

- c. The name, title, position or relationship to you of any individual involved in the subsequent wrongful conduct (if you know):

PART 4: IMPACT OF SEXUAL ABUSE

(Attach additional pages if necessary)

If you currently cannot describe any harm you have suffered on account of the sexual abuse, you may omit this section for now. However, you may be asked to provide the information requested at a later date.

- A. Please describe how you believe you were impacted, harmed, damaged, or injured as a result of the sexual abuse you described above. You can check the boxes, fill in the narrative, or both. **Please note that the boxes are not meant to limit the characterization or description of the impact(s) of your sexual abuse** (Check all that apply).

- Psychological / emotional health (including depression, anxiety, shame, suicidal thoughts, feeling numb, feeling of worthlessness, difficulty managing or feeling emotions including anger)
- Post-traumatic stress reactions (including intrusive images, feelings from the abuse, numbing or avoidance behaviors, emotion dissociation behaviors)
- Mental Health diagnoses (including Obsessive Compulsive Disorder-OCD, Bipolar Disorder, Borderline Personality, Post Traumatic Stress Disorder-PTSD, Severe Depression, Generalized Anxiety)
- Physical health (including chronic disease, chronic undiagnosed pain or physical problems)
- Education (failing grades, not graduating high school, or being unable to finish other training or education)

If this box is checked, please also indicate your highest level of education completed or degree obtained:

- No High School Degree or GED
- High School/GED Some College
- Associate's Degree Bachelor's Degree
- Masters, PhD, MD, JD, or other higher education

- Employment (including difficulties with supervisors, difficulty maintaining steady employment, being fired from jobs)

If this box is checked please also indicate:

Are you currently employed: Yes No

If yes, please provide your current occupation and employer:

If no, please provide your former occupation:

-
- Intimate relationships (including difficulty maintaining emotional attachments with significant others, difficulty with sexual behavior, marriage, or infidelity)

If this box is checked, please also indicate:

Are you currently married: Yes No
Have you ever been divorced: Yes No

- Difficulties with parenting children, whether through challenges to attachment or overly protective parental behaviors
- Social relationships (including distrust of others, isolating yourself, not being able to keep healthy relationships)
- Alcohol, prescription or illegal drug use, narcotics, self-harm (i.e. cutting), and/or substance abuse
- Other addictive behaviors, including gambling and sex addiction
- Loss of faith, religion, and/or spirituality
- Other (please explain and add any other information you remember to the categories above)
-
-
-

- B. **IMPACT STATEMENT:** If you wish to provide a narrative description of how you were impacted, harmed, damaged, or injured as a result of the sexual abuse you described above, please provide it below. Please provide in as much detail as you can recall in the lines below. You may use additional pages if needed.
-
-
-
-
-
-

C. TREATMENT HISTORY: Have you ever sought counseling or other mental health treatment for any reason even if you did not connect that treatment as being related to the sexual abuse that you described above?

Yes No

If your response to the prior question is “Yes,” please state with whom you sought counseling and when. You may attach additional pages if needed.

PART 5: ADDITIONAL INFORMATION

- A. **Prior Litigation.** Was a lawsuit regarding the sexual abuse you have described in this Survivor Proof of Claim filed by you or on your behalf?

Yes No

(If "Yes," you are required to attach a copy of the complaint.)

- B. **Prior Bankruptcy Claims.** Have you filed any claims in any other bankruptcy case relating to the sexual abuse you have described in this Survivor Proof of Claim?

Yes No

If "Yes", please identify the bankruptcy case (If "Yes," you are also required to attach a copy of any completed claim form.)

- C. **Settlements.** Regardless of whether a complaint was ever filed against any party because of the sexual abuse, have you settled any claim relating to the sexual abuse you have described in this Survivor Proof of Claim?

Yes No (If "Yes," please describe, including parties to the settlement. You are required to attach a copy of any settlement agreement.)

Have you ever accepted a prior settlement from the Diocese of Camden, New Jersey either through litigation or the Independent Victim Compensation Program (the IVCP)?

Yes No

If yes, please provide details of the settlement.

D. Services provided by the Diocese.

Did you receive, or are you currently receiving, counseling or other services provided by the Diocese?

Yes No

If yes, please provide the name of the service provider and description of the services.

E. Current Bankruptcy Case.

Are you currently a debtor in a bankruptcy case? Yes No

If yes, please provide the following information:

Name of Case: _____ Court: _____

Date filed: _____ Case No. _____

Chapter of your bankruptcy: Chapter 7 Chapter 11 Chapter 12 Chapter 13

Name of Trustee: _____

SIGNATURE

To be valid, this Survivor Proof of Claim must be signed by you or your attorney. If the Survivor Claimant is deceased or incapacitated, the form must be signed by the Survivor Claimant's representative or the attorney for the Survivor Claimant's estate. If the Survivor Claimant is a minor, the form must be signed by the Survivor Claimant's parent or legal guardian, or the Survivor Claimant's attorney. (Any form signed by a representative or legal guardian must attach documentation establishing such person's authority to sign this form for the Survivor Claimant.)

Penalty for presenting a fraudulent claim is a fine of up to \$500,000, imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152, 157 and 3571.

Check the appropriate box:

- I am the Survivor Claimant.
- I am the Survivor Claimant's attorney, guardian, kinship (or other authorized) caretaker, executor, or authorized representative.
- Other (describe): _____

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

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

Date: _____

Signature: _____

Print Name: _____

Relationship to Survivor Claimant (if not signed by Survivor Claimant):

Address: _____

Contact Phone: _____

Email: _____

Exhibit C
Confidentiality Agreement

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

THE DIOCESE OF CAMDEN, NEW JERSEY,

Debtor.

Chapter 11

Case No. 20-21257 (JNP)

**AUTHORIZED PARTY CONFIDENTIALITY AGREEMENT
REGARDING CONFIDENTIAL PROOFS OF CLAIM**

This Authorized Party Confidentiality Agreement Regarding Confidential Proofs of Claim (this “Agreement”) is entered into as of _____, 2021 by and among The Diocese of Camden, New Jersey (the “Diocese”), the Official Committee of Tort Claimant Creditors (the “Committee”) and [_____] (the “Recipient”), an Authorized Party pursuant to the *Order Establishing Deadlines for Filing Proofs of Claim and Approving the Form and Manner of Notice Thereof* (the “Order”) [ECF ___] entered by the United States Bankruptcy Court for the District of New Jersey (the “Bankruptcy Court”) in the above-captioned chapter 11 bankruptcy case (the “Chapter 11 Case”) on February ___, 2021.

WHEREAS, the Recipient will be granted access to Survivor Proofs of Claim and General Proofs of Claim that assert or appear to assert Abuse Claims (collectively, the “Confidential Proofs of Claim”) filed in the Chapter 11 Case after execution of this Agreement pursuant to and in accordance with the terms of the Order and this Agreement;

WHEREAS, Recipient acknowledges that the Confidential Proofs of Claim contain sensitive, non-public information, which is to remain confidential pursuant to the Order and the terms of this Agreement; and

WHEREAS, with the exception of counsel of record to Authorized Parties, access to the Confidential Proof of Claim Forms extends only to the natural person who executes this Agreement and a separate copy of this Agreement must be signed by each natural person who seeks access to the Confidential Proofs of Claim on behalf of an Authorized or Permitted Party. Counsel of Record to Authorized Parties may sign one form on behalf of their firm, and the terms of this Agreement and the Order shall apply to each member, partner, shareholder, counsel, associate, paraprofessional and employee of the Recipient firm, and all such individuals shall be subject to the terms of this Agreement and the Order as though they had signed it on their own behalf.

NOW THEREFORE, IT IS AGREED AS FOLLOWS:

1. Recipient agrees that the Confidential Proofs of Claim and any Confidential Information (as such term is defined below) contained therein shall be kept confidential pursuant to and in accordance with the terms of the Order and this Agreement.

2. For purposes of this Agreement, the term "Confidential Information" means each Confidential Proof of Claim itself, and the identity of the Survivor Claimant contained in a Confidential Proof of Claim, except to the extent (a) that the Survivor Claimant elects to permit disclosure of his/her identity in the Confidential Proof of Claim by authorizing such disclosure pursuant to the terms of the Confidential Proof of Claim Form or (b) such information (i) was known to the Recipient prior to being disclosed in an Confidential Proof of Claim, (ii) is or becomes generally available to the public through no act or failure on the part of the Recipient, (iii) is obtained from a third party under no obligation to maintain its confidentiality; or (iv) is developed by the Recipient independently without reference to any Confidential Proof of Claim.

3. Notwithstanding anything to the contrary herein, this Agreement does not pertain to (i) documents, discovery, deposition testimony, trial testimony or other materials produced by the Debtor, Diocese of Camden, its parishes, churches, schools and/or entities, whether in written, oral, electronic, graphic, audiovisual, or any other form, but rather does pertain only to the identity of the sexual abuse victim/survivor identified in the Confidential Proof of Claim; (ii) the Diocese, its parishes, churches, schools and/or entities, or to any sexual abuse predators or alleged sexual abuse predators (i.e. clergy, priests, teachers, employees, agent, or volunteers, etc.) identified in the Confidential Proof of Claim or (iii) the facts and details of the victim/survivor's sexual abuse/misconduct.

4. Recipient agrees to not to use or distribute any Confidential Proof of Claim Forms or Confidential Information in violation of this Agreement.

5. Recipient may use Confidential Proofs of Claim, and any Confidential Information contained therein, only in connection with the evaluation, prosecution or defense of the claims asserted in such Confidential Proofs of Claim in the Diocese's Chapter 11 Case, any related adversary proceedings or contested matters in the Chapter 11 Case, any related insurance or reinsurance coverage demands, claims, disputes, or litigation, and settlement negotiations or mediations regarding all of the foregoing, and as otherwise required by applicable federal or state laws or regulations (each, a "Permitted Use").

6. Recipient shall not disclose any Confidential Information to any other person or entity except that Recipient may disclose Confidential Information (i) to any person or entity that is an Authorized Party who may receive such information in regard to that particular claim pursuant to the Order and has executed a copy of this Agreement, (ii) to the Bankruptcy Court or any other tribunal of competent jurisdiction so long as such disclosure is made pursuant to a Permitted Use and under seal, or (iii) in accordance with the terms of the Order, including, but not limited to, paragraph 15(v) of the Order.

7. Recipient consents to the exclusive jurisdiction of the Bankruptcy Court to adjudicate any disputes with respect to any terms, condition or alleged violations of this Agreement or the Order.

8. Recipient shall promptly report any disclosure of Confidential Information in violation or breach of this Agreement to the Diocese and the Committee and shall cooperate with efforts to recover and secure any such Confidential Information and/or to mitigate the effects of any such disclosure.

9. Nothing in this Agreement precludes Recipient from seeking a modification of the Order or the terms of this Agreement with respect to any proposed disclosure of Confidential Information contained in the Confidential Proof of Claim Forms, *provided, however*, that (a) any motion for such modification shall be on notice to all Survivor Claimants, the Committee and the Diocese and (b) Recipient shall not disclose any Confidential Information in connection with any such petition unless such disclosure is restricted to the Bankruptcy Court, the Diocese, the Committee, the affected claimant(s) and made under seal.

10. This Agreement shall become effective as of the date it is delivered to counsel for the Diocese and counsel for the Committee.

Dated: _____, 2021

Dated: _____, 2021

THE DIOCESE OF CAMDEN, NEW JERSEY THE OFFICIAL COMMITTEE OF TORT CLAIMANT CREDITORS

By: _____

By: _____

Name: _____

Name: _____

Its: _____

Its: _____

Dated: _____, 2021

[INSERT NAME]

By: _____

Name: _____

Its: _____

Exhibit D

Bar Date Notice

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

THE DIOCESE OF CAMDEN, NEW JERSEY,

Debtor.

Chapter 11

Case No. 20-21257 (JNP)

NOTICE OF DEADLINE FOR FILING PROOFS OF CLAIM

**TO ALL PERSONS AND ENTITIES WITH CLAIMS AGAINST THE DIOCESE
OF CAMDEN, NEW JERSEY:**

PLEASE TAKE NOTICE that on October 1, 2020 (the “Petition Date”), The Diocese of Camden, New Jersey (the “Diocese”) 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 District of New Jersey (the “Bankruptcy Court”). Information regarding the Diocese, its mission, and other relevant information related to this chapter 11 case (the “Chapter 11 Case”) may be obtained at the case management website maintained by Prime Clerk, the Diocese’s Claims and Noticing Agent, at: <https://cases.primeclerk.com/camdendiocese/>.

PLEASE TAKE FURTHER NOTICE that on February ___, 2021, the Bankruptcy Court entered an order (the “Order”) establishing June 30, 2021 at 11:59 p.m. (prevailing Eastern time), as the deadline for all persons and entities to file prepetition claims in this Chapter 11 Case, including, but not limited to: (i) a claim related to sexual abuse committed by any person connected with the Diocese; (ii) any claims under 11 U.S.C. § 503(b)(9); and (iii) all governmental units (as defined in section 101(27) of the Bankruptcy Code) (“Governmental Units”) (the “Bar Date”).

Except as described below or in the Order, the Order requires all persons and Entities, including Governmental Units, that have or may assert prepetition claims of any type, kind, nature or description against the Diocese to submit proofs of claim so that they are actually received by Prime Clerk on or before the Bar Date. Please note that the terms “Entity,” “Governmental Unit,” and “Claim,” are defined below. For purposes of the Order, a “Survivor Claim” and a “Survivor Claimant” is as defined in the Survivor Proof of Claim Form enclosed herewith.

PLEASE TAKE FURTHER NOTICE that the Order directs all claimants to submit their claims using one of two prescribed forms. All claimants, except for those asserting Survivor Claims, are directed to use the General Proof of Claim Form to submit their claim. If the Diocese has identified you as having a potential Claim, other than a Survivor Claim, a copy of the General Proof of Claim Form is enclosed with this Notice. All claimants wishing to assert Survivor Claims are directed to use the Survivor Proof of Claim Form.

PLEASE TAKE FURTHER NOTICE that if the Diocese has identified you as having a potential Survivor Claim, a copy of the Survivor Proof of Claim Form is enclosed with this Notice. If no proof of claim form accompanies this Notice, or if you did not receive the correct proof of claim form, copies of both the General Proof of Claim Form and the Survivor Proof of Claim Form may be obtained online by visiting <https://cases.primeclerk.com/camden-diocese/>, or may be requested by calling 877-465-8420 (Toll-Free) or 347-817-4096 (Local).

KEY DEFINITIONS

As used in this Notice, the term “Entity” has the meaning given to it in section 101(15) of the Bankruptcy Code, and includes all persons (individuals, partnerships and corporations), estates, trusts, and the United States Trustee.

As used in this 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 Notice, the term “Claim” shall mean, as to or against the Diocese 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.

YOU SHOULD CONSULT AN ATTORNEY IF YOU HAVE ANY QUESTIONS, INCLUDING WHETHER YOU HAVE A CLAIM OR WHETHER YOU MUST FILE A PROOF OF CLAIM. SURVIVORS OF SURVIVOR CLAIMS MAY ALSO OBTAIN INFORMATION FROM COUNSEL FOR THE OFFICIAL COMMITTEE OF TORT CLAIMANT CREDITORS OF THE DIOCESE OF CAMDEN, NEW JERSEY (THE “COMMITTEE”), LOWENSTEIN SANDLER LLP, BY SENDING AN EMAIL TO DOCABUSECLAIMS@LOWENSTEIN.COM.

I. WHO MUST FILE A PROOF OF CLAIM PRIOR TO THE BAR DATE

- a. ***The Bar Date:*** The Order establishes June 30, 2021 at 11:59 p.m. (prevailing Eastern time) as the Bar Date for filing proofs of claim in this case.
- b. ***The Following Persons or Entities Must File a Proof of Claim on or Before the Bar Date:***
 - i. Any person or Entity who believes its prepetition claim was omitted from the Diocese’s Schedules of Assets and Liabilities (as amended) filed in this Chapter 11 Case (the “Schedules”), or whose prepetition claim is listed in the Schedules, but is designated as being “contingent,” “unliquidated,” or “disputed,” and who desires to participate in this Chapter 11 Case or to share

in any distributions to creditors that may be made in this Chapter 11 Case; and

- ii. Any person or Entity who believes that its prepetition claim is 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 as identified in the Schedules.
- iii. Any Survivor Claimant who wishes to assert a Survivor Claim against the Diocese, regardless of whether such person has previously filed a lawsuit against the Diocese or otherwise has given formal or informal notice of such claims to the Diocese, including any person whose claim may be barred by a statute of limitations or repose in effect as of the Bar Date.

c. *The Following Persons or Entities are Not Required to File Proofs of Claim at this Time:*

- i. Any person or Entity that has already properly filed a proof of claim against the Diocese with the Clerk of the Court for the Bankruptcy Court, except that any person who has asserted a Survivor Claim must submit a completed Survivor Proof of Claim;
- ii. Any person or Entity: (a) whose claim is listed in the Schedules or any amendments thereto; and (b) whose claim is not identified therein as “contingent,” “unliquidated,” or “disputed,” and (c) who does not dispute the amount or classification of its claim as set forth in the Schedules;
- iii. Any professionals retained by the Diocese, the Committee, and the Official Committee of Unsecured Trade Vendors pursuant to orders of this Court, who assert administrative claims for payment of fees and expenses subject to the Court’s approval, pursuant to sections 330, 331(a) and 503(b) of the Bankruptcy Code;
- iv. Any person or Entity that asserts an administrative expense claim against the Diocese pursuant to sections 503(b) or 507(a)(2) of the Bankruptcy Code;
- v. Any person or Entity whose claim against the Diocese is allowed by an order of the Court entered on or before the Bar Date; and
- vi. Any person or Entity whose claim has been previously settled or paid in full.

II. CONFIDENTIALITY OF SURVIVOR CLAIMS

Pursuant to the Order, filed Survivor Proofs of Claim will be treated confidentially in this Chapter 11 Case unless the Survivor elects to have his or her claim publicly disclosed. Any Survivor Proof of Claim that you file will not be available to the general public, and will be kept confidential, except that information will be provided to Authorized Parties under the Order, all of whom will agree to keep the information provided by you confidential pursuant to the Order.

III. CONSEQUENCES OF FAILURE TO FILE PROOF OF CLAIM

Any person or Entity that is required to file a proof of claim, but fails to do so on or before the Bar Date: (i) shall NOT be treated as a creditor with respect to such Claim and shall not be entitled to vote to accept or reject, or to share in any distribution under, any Chapter 11 plan proposed and/or confirmed in this Chapter 11 Case; and (ii) shall be forever barred, estopped, and enjoined from asserting such Claim against the Diocese (or filing a proof of claim with respect thereto), and the Diocese and its property shall be forever discharged from any and all indebtedness or liability with respect to such Claim. If it is unclear from the Schedules whether your Claim is disputed, contingent or unliquidated as to amount or is otherwise properly listed and classified, you must file a proof of claim on or before the Bar Date. Any party that relies on the information in the Schedules bears responsibility for determining that its Claim is accurately listed therein.

IV. RESERVATION OF RIGHTS

Nothing in the Order shall be construed as limiting any party's rights 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 Notice shall preclude any party from objecting to any Claim, whether scheduled or filed, on any grounds.

V. PROCEDURE FOR FILING PROOFS OF CLAIM

Proofs of claim should not be filed with the Court or with the Clerk of the Court. Instead, **all proofs of claim should be submitted to Prime Clerk**, the Diocese's Claims and Noticing Agent, as set forth below:

To be considered valid, each Proof of Claim submitted in this Chapter 11 Case must: (a) be written in English, (b) be denominated in lawful currency of the United States as of the Petition Date, (c) have attached copies of any writings upon which the claim is based in accordance with bankruptcy Rules 3001(c) and 3001(d) (including for secured claims, evidence that the security interest has been perfected), and (d) be actually received by Prime Clerk, the Diocese's Claims and Noticing Agent, on or prior to the Bar Date either:

(i) electronically using the interface available on Prime Clerk's website at <https://cases.primeclerk.com/camden-diocese/EPOC-Index>; or

(ii) by delivering an original copy by hand mail or overnight courier to:

The Diocese of Camden, New Jersey Claims Processing Center
c/o Prime Clerk LLC
850 3rd Avenue, Suite 412
Brooklyn, NY 11232

Proofs of claim sent by facsimile, telecopy, or e-mail will not be accepted.

VI. ADDITIONAL INFORMATION

You may be listed as the holder of a Claim in the Diocese's 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 contingent, unliquidated, or disputed, you must file a proof of claim. Copies of the Schedules and the Order are available for inspection during regular business hours at the office of the Office of the Clerk of Court, United States Bankruptcy Court for the District of New Jersey, U.S. Post Office and Courthouse, 401 Market Street, Camden, New Jersey 08101. In addition, copies of the Diocese's Schedules and the Order are available on the Prime Clerk case management website at <https://cases.primeclerk.com/camdendiocese/> for free, or on the Court's website (<http://njb.uscourts.gov/>) by following the directions for accessing the ECF system on such website (a PACER password is required).

Requests for proofs of claim should be directed to Prime Clerk, the Diocese's Claims and Noticing Agent at 877-465-8420 (Toll-Free) or 347-817-4096 (Local). Prime Clerk is not permitted to give you legal advice. You should consult your own attorney for assistance regarding any other inquiries, such as questions concerning the contents of this notice or the completion or filing of a proof of claim.

Dated: February ___, 2021

Exhibit E

Publication Notice

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re The Diocese of Camden, New Jersey
Case No. 20-21257 (JNP)

PLEASE TAKE NOTICE THAT on October 1, 2020, The Diocese of Camden, New Jersey, (the “Diocese”) filed for protection under Chapter 11 of Title 11 of the United States Code.

The Bankruptcy Court has established June 30, 2021 at 11:59 p.m. (prevailing Eastern time) as the deadline to file proofs of claim against the Diocese (the “Bar Date”).

If you have a claim against the Diocese including, without limitation, a claim related to sexual abuse committed by any person connected with the Diocese, you must file a claim on or before the Bar Date with Prime Clerk, the appointed Claims Agent.

Please visit <https://cases.primeclerk.com/camdendiocese> or call 877-465-8420 (Toll-Free) or 347-817-4096 (Local) for more information on how to file your proof of claim.

IF YOU DO NOT TIMELY FILE A PROOF OF CLAIM, YOU MAY FORFEIT YOUR RIGHT TO VOTE ON ANY PLAN OF REORGANIZATION AND TO SHARE IN ANY DISTRIBUTIONS TO CREDITORS IN CONNECTION WITH THE DIOCESE'S CHAPTER 11 CASE.