UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW MEXICO

In re:
ROMAN CATHOLIC CHURCH OF THE ARCHDIOCESE OF SANTA FE,
a New Mexico corporation sole,

Debtor.

Case No. 18-13027-t11

NOTICE OF DEADLINE FOR OBJECTIONS TO MOTION TO APPROVE PARTICIPATING RELIGIOUS ORDERS SETTLEMENT AGREEMENTS

PLEASE TAKE NOTICE THAT:

On November 3, 2022, the Roman Catholic Church of the Archdiocese of Santa Fe, a New Mexico corporation sole, (the "Debtor"), the Debtor and Debtor-in-possession in the above-captioned Chapter 11 reorganization case, filed the *Debtor's First Amended Plan of Reorganization Dated November 3, 2022* (Doc. No.1151) (as it may be amended, the "Plan") and an Amended Disclosure Statement to accompany the Plan (Doc. No. 1152) (the "Amended Disclosure Statement"). On November 8, 2022, the Bankruptcy Court approved the Amended Disclosure Statement.

The Plan provides the means for settling and paying all Claims[1] asserted against the Debtor. The Plan also provides for certain Participating Religious Orders to participate by contributing funds that will be used for the benefit of Tort Claimants. The Plan provides for the creation of the ASF Settlement Trust for the exclusive benefit of Class 3 Tort Claimants and the Unknown Tort Claims Trust for the exclusive benefit of Class 4 Unknown Tort Claimants (together, the "Trusts"). The Plan also provides that all Tort Claims and all Claims that directly or indirectly, arise out of, relate to, or are in connection with the same injury, damages, facts or circumstances giving rise to a Tort Claim (including an Unknown Tort Claim) will be channeled to the Trusts. The Trust Assets principally will consist of cash and a promissory note from the Debtor, and cash contributions by ASF Participating Parties and Settling Insurers, as more fully described in the Amended Disclosure Statement.

The Debtor has entered into certain Participating Religious Orders Settlement Agreements that will provide a total of $8,475,000 in settlement payments from the Participating Religious Orders and their Funding Insurers. In exchange for this payment, the Participating Religious Orders and their Funding Insurers will become Protected Parties under the Plan as it pertains to all Tort Claims against both the Debtor and one of the Participating Religious Orders, including Unknown Tort Claims ("Joint Tort Claims") and all other Related Insurance Claims and Extra Contractual Claims that directly or indirectly, arise out of, relate to, or are in connection with the same injury, damages, facts or circumstances giving rise to a Joint Tort Claim. These will be included in the Channeled Claims that will be channeled to the Trusts, meaning that the Trusts will be the sole and exclusive sources of payment for any such Claims against the Debtor, the Participating Religious Orders, and the Funding Insurers that are paying part of the contribution to the Trusts. If the Plan is confirmed, the Participating Religious Orders and their Funding Insurers will also be released from any such Claims under the Plan, and the Participating Religious Orders Settlement Agreements.

[1] Capitalized terms not otherwise defined herein are as defined in the Plan and, if not defined in the Plan, as defined in the Bankruptcy Code.

The **"**Participating Religious Orders" are: Sons of the Holy Family, Inc.; Congregation of the Blessed Sacrament, Province of St. Ann; Servants of the Paraclete; Brothers of the Christian Schools, SFNO District; Province of St. John the Baptist of the Order of the Friars Minor and Province of Our Lady of Guadalupe of the Order of the Friars Minor.

The "Funding Insurers" are: (i) Arrowood Indemnity Company, formerly known as Royal Indemnity Company, successor by merger to Royal Insurance Company of America ("Arrowood"); (ii) The Catholic Mutual Relief Society of America ("Catholic Mutual"); (iii) the Continental Insurance Company ("CNA"); (iv) Liberty Mutual Insurance Company; (v) Travelers Indemnity Company and St. Paul Fire and Marine Insurance Company, as itself and as a successor to or assignee of St. Paul Mercury Indemnity Company and St. Paul Fire and Marine Insurance Company ("Travelers"); (vi) United States Fire Insurance Company ("U.S. Fire"); and (vii) Hartford Accident and Indemnity Company ("Hartford"). Arrowood, Catholic Mutual, CNA, Travelers, and U.S. Fire are each also Settling Insurers under the Plan.

The Debtor has filed a motion to approve the Participating Religious Orders Settlement Agreements in conjunction with confirmation of the Plan.

IF YOU HOLD CLAIMS AGAINST THE DEBTOR AND ANY OF THE PARTICIPATING RELIGIOUS ORDERS, YOUR RIGHTS MAY BE AFFECTED.

Copies of the Participating Religious Orders Settlement Agreements, the Plan, the Amended Disclosure Statement and the exhibits thereto, including the Insurance Settlement Agreements and the Participating Party Agreement, can be inspected at the Office of the Clerk of the Bankruptcy Court at the address below, at the Debtor's website at https://archdiosf.org, or by requesting copies by mail from counsel to the Debtor, at 505-766-9272.

Objections must be: (i) be in writing, (ii) state the name and address of the objecting party, (iii) identify the Participating Religious Order Settlement Agreement to which the objection is directed, (iv) state with particularity the basis and nature of the objection, and (iv) be filed with the Court and filed electronically to the extent required by New Mexico Local Bankruptcy Rule 5005-4 together with proof of service, and served on Thomas D. Walker, Walker & Associates, P.C., at the address given below to be received no later than **5:00 p.m.** (Mountain Time) on **December 22, 2022**. The Clerk's mailing address (for use if electronic filing is not required) is Clerk of the Bankruptcy Court, Pete V. Domenici U.S. Courthouse, 333 Lomas Blvd. NW, Suite 360, Albuquerque, New Mexico 87102.

Objections not timely filed and served in the manner set forth above shall not be considered and shall be overruled. If any objections are timely filed, they will be considered at the hearing on confirmation of the Plan to be held on **December 28, 2022, at 9:00 a.m. Mountain Time**, in the Jemez Courtroom, Third Floor, Pete V. Domenici U.S. Courthouse, 333 Lomas Blvd. NW, Albuquerque, NM 87102. If no objections are timely filed, an order approving the Participating Religious Orders Settlement Agreements will be presented to the Bankruptcy Court without further notice.

Date of Mailing: November 21, 2022

Respectfully submitted by:
WALKER & ASSOCIATES, P.C.
s/filed electronically 11/21/2022
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CERTIFICATE OF SERVICE:

In accordance with NM LBR 9036-1 and Fed. R. Civ. P. 5(b)(3), this certifies that on November 21, 2022, a copy of the foregoing was served via the Court's CM/ECF notification facilities to those parties who are registered CM/ECF participants in this case, and via first class United States mail, postage prepaid, to all persons listed on the mailing matrix kept by the Clerk of the Bankruptcy Court, a copy of which is attached to the original of this Notice that will be filed with the Clerk and to the confidential mailing list maintained by the Clerk of the Bankruptcy Court that will not be attached.

s/ filed electronically 11/21/2022
Thomas D. Walker