

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

**The Diocese of Camden, New Jersey
Chapter 11 Reorganization Proceeding
(Case No. 20-21257)**

**NOTICE OF HEARING ON, AND OBJECTION DEADLINE
FOR, THE DEBTOR'S MOTION TO APPROVE INSURER
SETTLEMENTS**

PLEASE TAKE NOTICE that the Diocese of Camden, New Jersey ("Diocese"), the debtor in the captioned bankruptcy proceeding, case number 20-21257, in the United States Bankruptcy Court for the District of New Jersey ("Court") has entered into Settlement Agreements (collectively "Agreements") pursuant to 11 U.S.C. §§ 105(a) and 363 and Fed. R. Bankr. P. 2002(l), 6004(c), and 9019(a) with Underwriters at Lloyd's, London, and certain London Market Insurance Companies (Catalina Worthing Insurance Ltd f/k/a HFPI (as Part VII transferee of Excess Insurance Company Ltd), RiverStone Insurance (UK) Limited (as successor in interest to Terra Nova Insurance Company Ltd. and Sphere Drake Insurance PLC), Tenecom Ltd. (f/k/a Yasuda Fire & Marine Ins. Co. (UK) Ltd.), Union America Insurance Company, London & Edinburgh Insurance Company Ltd (as successor in interest to London & Edinburgh General Ins. Co. Ltd.), and Dominion Insurance Company Ltd.), Interstate Fire & Casualty Company, National Surety Corporation, and Century Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance Company of North America, Insurance Company of North America, Federal Insurance Company, and Illinois Union Insurance Company (collectively, "Insurers").

PLEASE TAKE FURTHER NOTICE that on July 28, 2026, the Diocese filed a motion to approve the Agreements ("Motion"), at ECF 4054, in the Court. A hearing on the Motion shall commence on **August 18, 2026 at 11:00 a.m.**, before the Honorable Jerrold N. Poslusny, Jr., United States Bankruptcy Judge, at the United States Bankruptcy Court, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, Camden, New Jersey 08101.

PLEASE TAKE FURTHER NOTICE that if the Motion is approved, then, as described more particularly in the Agreements, the Diocese and certain non-debtor related entities (collectively with the Diocese, the "DOC Entities") will sell, and the Insurers will purchase, (a) all policies of insurance issued or allegedly issued by the Insurers to the DOC Entities, whether known or unknown at the time of the Agreements, including but not limited to those policies identified in

the Agreements, along with (b) certain related Claims of the DOC Entities (collectively, and as defined in the Settlement Agreements, the “Purchased Property”).

PLEASE TAKE FURTHER NOTICE THAT THE DOC ENTITIES ARE SEEKING TO SETTLE AND SELL, FREE AND CLEAR OF ALL LIENS, CLAIMS, ENCUMBRANCES, AND OTHER INTERESTS, THE PURCHASED PROPERTY. THIS “FREE AND CLEAR” SALE OF THE PURCHASED PROPERTY ENTAILS CERTAIN RELEASES, INJUNCTIONS, AND OTHER PROTECTIVE PROVISIONS IN FAVOR OF THE INSURERS. AMONG OTHER THINGS, THE MOTION PROPOSES A SETTLING INSURER INJUNCTION THAT PERMANENTLY ENJOINS ALL PERSONS WHO HAVE HELD OR ASSERTED, OR MAY IN THE FUTURE HOLD OR ASSERT, ANY CLAIMS FROM TAKING ANY ACTION, DIRECTLY OR INDIRECTLY, FOR PURPOSES OF ASSERTING, ENFORCING, OR ATTEMPTING TO ASSERT OR ENFORCE ANY BARRED CLAIM (AS DEFINED IN THE AGREEMENTS AND INCLUDING CLAIMS AGAINST THE DOC ENTITIES ARISING OUT OF SEXUAL ABUSE) AGAINST THE INSURERS, CERTAIN RELATED ENTITIES, OR THE PROPERTY OR ASSETS OF EACH. THE DOC ENTITIES ARE SEEKING TO FULLY RELEASE ANY CLAIMS AGAINST THE ABOVE-REFERENCED INSURER RELEASED PARTIES ARISING FROM OR RELATED IN ANY WAY TO THE POLICIES, INCLUDING ALL EXTRA-CONTRACTUAL CLAIMS. FURTHER, THE AGREEMENTS SPECIFY THAT THE INSURERS WILL RECEIVE THE BENEFIT OF AN INJUNCTION CHANNELING ALL CHANNELED CLAIMS (AS DEFINED IN THE AGREEMENTS), INCLUDING CLAIMS FOR SEXUAL ABUSE, TO A TRUST UNDER THE CONFIRMED PLAN, WHICH WILL ADMINISTER AND RESOLVE THE CHANNELED CLAIMS, AND THE HOLDERS OF ALL SUCH CLAIMS WILL BE BARRED FROM TAKING ANY ACTION AGAINST THE PROTECTED PARTIES OR INSURERS, INCLUDING COMMENCING OR CONTINUING AN ACTION WITH RESPECT TO ANY CHANNELED CLAIM; ENFORCING A JUDGMENT OR ORDER AGAINST THE PROTECTED PARTIES OR INSURERS WITH RESPECT TO ANY CHANNELED CLAIM; CREATING OR PERFECTING LIENS OF ANY KIND RELATING TO ANY CHANNELED CLAIM; AND ASSERTING OR IMPLEMENTING ANY CHANNELED CLAIM AGAINST ANY OF THE PROTECTED PARTIES OR INSURERS. THERE ARE ADDITIONAL

PROVISIONS IN THE AGREEMENTS — BEYOND THOSE SET FORTH IN THE PRECEDING SENTENCES — WHICH SHOULD BE REVIEWED TO UNDERSTAND COMPLETELY THE AGREEMENTS AND THEIR EFFECT ON YOUR RIGHTS.

Copies of the Motion may be obtained by contacting (a) Kroll at <https://cases.ra.kroll.com/camdendiocese/>, camdeninfo@ra.kroll.com, or Toll-Free: (877) 465-8420; Local: (347) 817-4096; or (b) visiting the website of United States Bankruptcy Court for the District of New Jersey at <https://www.njb.uscourts.gov/>. A PACER login and password are required to access documents on the Bankruptcy Court's website and these can be obtained through the PACER Service Center at www.pacer.psc.uscourts.gov.

PLEASE TAKE FURTHER NOTICE that any written objection to the Motion by a party other than the Diocese, the Insurers, the committees appointed in the case, and the parishes and other Catholic entities located within the territory of the Diocese must be filed and served by **August 11, 2026**. Any written response must reference case number 20-21257; state the specific facts upon which the objection is based; be filed with the Clerk of the Court; provide proof of service that a copy of the response was served on counsel for the Diocese, counsel for the Official Committee of Tort Claimant Creditors, counsel for the Official Committee of Unsecured Trade Creditors, and upon the United States Trustee; and must also conform and be served in accordance with the Local Rules for the Bankruptcy Court for the District of New Jersey.

IF YOU HAVE (1) A CLAIM AGAINST THE DOC ENTITIES AS TO WHICH INSURANCE COVERAGE IS OR MAY BE AVAILABLE, (2) AN INTEREST IN ANY OF THE DOC ENTITIES' INSURANCE POLICIES OR CERTIFICATES, OR (3) ANY CLAIMS AGAINST THE INSURERS RELATING TO THE FOREGOING, **YOUR RIGHTS MAY BE AFFECTED.**