

**UNITED STATES
BANKRUPTCY COURT
DISTRICT OF MINNESOTA
THE ARCHDIOCESE
OF SAINT PAUL AND
MINNEAPOLIS CHAPTER
11 REORGANIZATION
PROCEEDING
(CASE NO. 15-30125)
NOTICE OF HEARINGS AND
OBJECTION DEADLINES
FOR MOTIONS TO
APPROVE SETTLEMENTS
WITH INSURERS**

PLEASE TAKE NOTICE that The Archdiocese of Saint Paul and Minneapolis (the "Archdiocese") and the Official Committee of Unsecured Creditors (the "Committee") have filed, in the United States Bankruptcy Court for the District of Minnesota, case number 15-30125, motions to approve settlement, release and policy and certificate buyback agreements (the "Insurance Settlement and Buyback Agreements") pursuant to 11 U.S.C. §§ 105(a), 363, & 365 and Fed. R. Bankr. P. 2002(l), 6004(c), and 9019(a) with the following entities (the "Settling Insurers"):

The Catholic Mutual Relief Society of America (including certificates issued to certain parishes); The Home Insurance Company and Liquidation; State Farm Fire & Casualty Company; Employers Liability Assurance Corporation and its successors Lamorak Ins. Co. f/k/a OneBeacon America Ins. Co. and Belvedere Insurance Company; The Fidelity and Casualty Company of New York, National Fire Insurance Company of Hartford, American Casualty Company of Reading, Pa., and Continental Casualty Company; Fireman's Fund Insurance Company, as successor to Fireman's Fund Indemnity Company, and Interstate Fire & Casualty Company; TIG Insurance Company, as successor to International Insurance Company; Hartford Accident and Indemnity Company; American Home Assurance Company; Travelers Casualty and Surety Company (formerly known as Aetna Casualty and Surety Company), Northfield Insurance Company, St. Paul Surplus Lines Insurance Company, and St. Katherine Insurance Company PLC (now known as St. Paul International Insurance Company); Travelers Indemnity Company; St. Paul Fire and Marine Insurance Company; United States Fidelity and Guaranty Company; and Phoenix Insurance Company; and 21st Century Centennial Insurance Company f/k/a Colonial Penn Insurance Company and Certain Underwriters at Lloyd's, London subscribing to Policies SL3721, SL3722, SL3723, ISL3115, ISL3116, ISL3117, ISL3675, ISL3613, ISL3614, and ISL3615; Catalina Worthing Insurance Ltd f/k/a HFPI (as Part VII transferee of (Excess Insurance Company Ltd and/or London & Edinburgh Insurance Company Ltd as successor to London & Edinburgh General Insurance Company Ltd)), Riverstone Insurance (UK) Limited (as successor in interest to Sphere Drake Insurance Ltd.), Riverstone Management Limited for and on behalf of Markel International Insurance Company Limited (formerly known as Terra Nova Insurance Company Limited), CX Reinsurance Company Ltd. (formerly known as CNA Reinsurance of London Ltd.), Dominion Insurance Company Ltd., Stronghold Insurance Company Limited, Tenecom Ltd. (formerly known as The Yasuda Fire & Marine Insurance Company of Europe Ltd. and also known as Yasuda Fire & Marine Insurance Company (U.K.)), and those insurers subscribing to Insurance Policy Nos. SLC5743, ICO4076, ICO5200, and ICO5402.

If approved, the Archdiocese will (a) sell, and certain of the Settling Insurers will purchase, all of the insurance policies and certain certificates issued or allegedly issued to or owned by the Archdiocese as described more particularly in the Insurance Settlement and Buyback Agreements, free and clear of all liens, claims, encumbrances, and other interests, and/or (b) fully release any all claims against the Settling Insurers and their related entities.

IN ADDITION, THE MOTIONS SEEK A RULING THAT SETTLING INSURERS ARE ENTITLED TO THE BENEFIT OF INJUNCTIONS, AS PART OF THE ARCHDIOCESE'S AND COMMITTEE'S CONTEMPLATED JOINT PLAN OF REORGANIZATION, PERMANENTLY BARRING ALL CLAIMS BY ANY PERSON OR ENTITY AGAINST SETTLING INSURERS AND CERTAIN RELATED ENTITIES (THE "SETTLING INSURER ENTITIES," AS SPECIFICALLY DEFINED IN THE JOINT PLAN) RELATING TO (A) ALL INSURANCE POLICIES AND CERTIFICATES ISSUED OR ALLEGEDLY ISSUED TO THE ARCHDIOCESE OR (B) TORT CLAIMS RESULTING IN WHOLE OR IN PART FROM SEXUAL ABUSE OR MISCONDUCT.

Copies of the Joint Plan and the motions to approve the Insurance Settlement and Buyback Agreements are on file with the Court, 200 Warren E. Burger Federal Building and United States Courthouse, 316 North Robert Street, St. Paul, MN 55101. Copies of the Joint Plan, Amended Disclosure Statement, and motions to approve the Insurance Settlement and Buyback Agreements may be obtained by (a) contacting J. Zahler at the Archdiocese at 777 Forest Street, Saint Paul, MN 55106, email zahlerj@archspm.org, phone: (651) 291-4408, fax: (651) 290-1629 during normal business hours; (b) visiting the Archdiocese's website at: <http://information.archspm.org/>; or (c) visiting the website of United States Bankruptcy Court for the District of Minnesota at <http://www.mnb.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 the hearing on motions to approve the Insurance Settlement and Buyback Agreements will occur on Thursday, August 30, 2018, at 10:30 a.m. in Courtroom 8 West, United States Courthouse, 300 South Fourth Street, Minneapolis, MN 55415. Any response or objection to motions to approve the Insurance Settlement and Buyback Agreements must be filed and served by Friday, August 24, 2018.

IF YOU HAVE A CLAIM AGAINST THE ARCHDIOCESE AS TO WHICH INSURANCE COVERAGE IS OR MAY BE AVAILABLE OR HAVE AN INTEREST IN ANY OF THE ARCHDIOCESE'S INSURANCE POLICIES OR CERTIFICATES, YOUR RIGHTS MAY BE AFFECTED.

If you wish to object to any aspect of the motions to approve the Insurance Settlement and Buyback Agreements, you must file your response with the Clerk of the Court at:

Clerk of the Bankruptcy Court
200 Warren E. Burger Federal Building and United States Courthouse
316 North Robert Street
St. Paul, MN 55101

Any written response must reference case number 15-30125, state the specific facts upon which the objection is based, and provide proof of service that a copy of the response was served on:

Richard D. Anderson, 2200 IDS Center, 80 South Eighth Street, Minneapolis, MN 55402;
Robert Kugler, 50 South Sixth Street, Suite 2600, Minneapolis, MN 55402; and
Office of The United States Trustee, 300 South Fourth Street, Suite 1015 Minneapolis, MN 55415.

Any written response must also conform and be served in accordance with the Local Rules for the Bankruptcy Court for the District of Minnesota.

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