

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND**

In re:

Case No.: 23-16969-MMH

ROMAN CATHOLIC ARCHBISHOP OF
BALTIMORE,

Chapter 11

Debtor.

ROMAN CATHOLIC ARCHBISHOP OF
BALTIMORE, A CORPORATION SOLE, TRUSTEES
OF THE CATHOLIC CATHEDRAL CHURCH OF
BALTIMORE (THE BASILICA), ST. ALPHONSUS
ROMAN CATHOLIC CONGREGATION,
INCORPORATED, CORPUS CHRISTI ROMAN
CATHOLIC CONGREGATION, INCORPORATED,
ST. PETER CLAVER'S ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST.
VERONICA'S ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST. FRANCIS
OF ASSISI ROMAN CATHOLIC CONGREGATION,
INCORPORATED, THE SHRINE OF THE LITTLE
FLOWER ROMAN CATHOLIC CONGREGATION,
INCORPORATED, OUR LADY OF POMPEI
ROMAN CATHOLIC CONGREGATION,
INCORPORATED, SACRED HEART OF JESUS
ROMAN CATHOLIC CONGREGATION,
INCORPORATED (INDIVIDUALLY AND AS
SUCCESSOR-IN-INTEREST TO ST. MICHAEL'S
ROMAN CATHOLIC CONGREGATION,
INCORPORATED), ST. ROSE OF LIMA ROMAN
CATHOLIC CONGREGATION, INCORPORATED,
ST. VINCENT DE PAUL ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST. LEO'S,
BALTIMORE, ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST.
PATRICK'S ROMAN CATHOLIC
CONGREGATION, INCORPORATED, HOLY
ROSARY ROMAN CATHOLIC CONGREGATION,
INCORPORATED, ST. WENCESLAUS' ROMAN
CATHOLIC CONGREGATION, INCORPORATED
(INDIVIDUALLY AND AS SUCCESSOR TO ST.
JAMES AND ST. JOHN ROMAN CATHOLIC
CONGREGATION INCORPORATED), ST.
KATHARINE OF SIENA ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST. JAMES

Adversary Proceeding No.: 24-_____

THE LESS ROMAN CATHOLIC CONGREGATION,
INCORPORATED, ST. JOHN THE EVANGELIST
ROMAN CATHOLIC CONGREGATION,
INCORPORATED, ST. FRANCIS XAVIER'S
ROMAN CATHOLIC CONGREGATION
INCORPORATED, ST. IGNATIUS, ROMAN
CATHOLIC CONGREGATION, INCORPORATED,
ST. CLEMENT'S, LANSDOWNE, ROMAN
CATHOLIC CONGREGATION, INCORPORATED,
ST. MARK'S ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST. AGNES
ROMAN CATHOLIC CONGREGATION,
INCORPORATED, ST. ALPHONSUS RODRIGUEZ,
WOODSTOCK, ROMAN CATHOLIC
CONGREGATION, INCORPORATED, HOLY
FAMILY ROMAN CATHOLIC CONGREGATION,
INCORPORATED, ST. CHARLES BORROMEIO'S
ROMAN CATHOLIC CONGREGATION,
INCORPORATED, OUR LADY OF THE ANGELS
CATHOLIC COMMUNITY, INC., HOLY KOREAN
MARTYRS ROMAN CATHOLIC CONGREGATION,
INC. (INDIVIDUALLY AND AS SUCCESSOR IN
INTEREST TO KOREAN ROMAN CATHOLIC
CONGREGATION OF BALTIMORE,
INCORPORATED), CHURCH OF THE NATIVITY
OF OUR LORD JESUS CHRIST ROMAN
CATHOLIC CONGREGATION, INCORPORATED,
SACRED HEART ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST.
JOSEPH'S, TEXAS, ROMAN CATHOLIC
CONGREGATION, INCORPORATED,
IMMACULATE HEART OF MARY,
BAYNESVILLE, ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST.
URSULA'S ROMAN CATHOLIC CONGREGATION,
INCORPORATED, ST. MICHAEL THE
ARCHANGEL, OVERLEA, ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST.
JOSEPH'S, FULLERTON, ROMAN CATHOLIC
CONGREGATION, INCORPORATED, OUR LADY,
QUEEN OF PEACE, MIDDLE RIVER, ROMAN
CATHOLIC CONGREGATION, INCORPORATED,
ST. CLARE'S ROMAN CATHOLIC
CONGREGATION, INCORPORATED, SACRED
HEART OF MARY ROMAN CATHOLIC
CONGREGATION, INCORPORATED, OUR LADY

OF HOPE ROMAN CATHOLIC CONGREGATION,
INCORPORATED, ST. RITA'S ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST. LUKE'S
ROMAN CATHOLIC CONGREGATION,
INCORPORATED, OUR LADY OF LA VANG
ROMAN CATHOLIC CONGREGATION, INC., ST.
MARK'S, FALLSTON, ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST.
MARGARET'S ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST. MARY
MAGDALEN, BEL AIR, MISSION, ST. IGNATIUS',
HICKORY, ROMAN CATHOLIC CONGREGATION,
INCORPORATED, ST. MARY'S PYLESVILLE,
ROMAN CATHOLIC CONGREGATION,
INCORPORATED (AS ITSELF AND AS
SUCCESSOR-IN-INTEREST TO ST. PAUL'S,
CARDIFF, ROMAN CATHOLIC CONGREGATION,
INCORPORATED), CHURCH OF THE HOLY
SPIRIT ROMAN CATHOLIC CONGREGATION
INCORPORATED, PRINCE OF PEACE ROMAN
CATHOLIC CONGREGATION, INCORPORATED,
ST. FRANCIS DE SALES, ABINGDON, ROMAN
CATHOLIC CONGREGATION, INCORPORATED,
ST. JOAN OF ARC ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST.
PATRICK'S, HAVRE DE GRACE, ROMAN
CATHOLIC CONGREGATION, INCORPORATED,
SAINT DOMINIC'S ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST. THOMAS
MORE ROMAN CATHOLIC CONGREGATION,
INCORPORATED, BLESSED SACRAMENT
ROMAN CATHOLIC CONGREGATION,
INCORPORATED, THE CATHEDRAL OF MARY
OUR QUEEN ROMAN CATHOLIC
CONGREGATION, INCORPORATED, THE SHRINE
OF THE SACRED HEART ROMAN CATHOLIC
CONGREGATION INCORPORATED, ST. THOMAS
AQUINAS ROMAN CATHOLIC CONGREGATION,
INCORPORATED, ST. AMBROSE ROMAN
CATHOLIC CONGREGATION, INCORPORATED,
THE RESURRECTION OF OUR LORD, ROMAN
CATHOLIC CONGREGATION, INCORPORATED,
OUR LADY OF THE FIELDS, MILLERSVILLE,
ROMAN CATHOLIC CONGREGATION,
INCORPORATED, ST. ELIZABETH ANN SETON
ROMAN CATHOLIC CONGREGATION,

INCORPORATED, OUR LADY OF THE
CHESAPEAKE ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST. JOHN
THE EVANGELIST, SEVERNA PARK, ROMAN
CATHOLIC CONGREGATION, INCORPORATED,
ST. ANDREW BY THE BAY ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST. MARY'S,
ANNAPOLIS, ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST. JOHN
NEUMANN MISSION CHURCH, OUR LADY OF
PERPETUAL HELP, EDGEWATER ROMAN
CATHOLIC CONGREGATION, HOLY FAMILY,
DAVIDSONVILLE, ROMAN CATHOLIC
CONGREGATION INCORPORATED, OUR LADY
OF SORROWS' ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST. PETER'S
HANCOCK, ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST.
MICHAEL'S, CLEAR SPRING, ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST.
AUGUSTINE'S WILLIAMSPORT, ROMAN
CATHOLIC CONGREGATION, INCORPORATED,
ST. MARY'S, HAGERSTOWN, ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST. MARY
SCHOOL, HAGERSTOWN, ST. ANN,
HAGERSTOWN, ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST. JAMES',
BOONSBORO, ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST.
JOSEPH'S-ON-CARROLLTON MANOR ROMAN
CATHOLIC CONGREGATION, INCORPORATED,
ST. JOHN THE EVANGELIST'S, FREDERICK,
ROMAN CATHOLIC CONGREGATION,
INCORPORATED, ST. PETER'S LIBERTYTOWN,
ROMAN CATHOLIC CONGREGATION,
INCORPORATED, ST. ANTHONY'S SHRINE,
EMMITSBURG, ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST. JOSEPH'S
ROMAN CATHOLIC CONGREGATION,
INCORPORATED, HOLY FAMILY CATHOLIC
COMMUNITY OF MIDDLETOWN, ROMAN
CATHOLIC CONGREGATION, INC., ST.
KATHARINE DREXEL ROMAN CATHOLIC
CONGREGATION, INC., ST. JOSEPH'S,
TANEYTOWN, ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST.

BARTHOLOMEW'S, MANCHESTER, ROMAN CATHOLIC CONGREGATION, INCORPORATED, ST. JOHN'S, WESTMINSTER, ROMAN CATHOLIC CONGREGATION, INCORPORATED, ST. MICHAEL'S POPLAR SPRINGS, ROMAN CATHOLIC CONGREGATION, INCORPORATED, ST. LOUIS' ROMAN CATHOLIC CONGREGATION, INCORPORATED, ST. JOHN THE EVANGELIST, COLUMBIA, ROMAN CATHOLIC CONGREGATION, INCORPORATED, CHURCH OF THE RESURRECTION ROMAN CATHOLIC CONGREGATION, INCORPORATED, OUR LADY OF PERPETUAL HELP ROMAN CATHOLIC CONGREGATION, INCORPORATED, ASSOCIATED CATHOLIC CHARITIES, INC., CARDINAL SHEHAN SCHOOL, INC., ARCHBISHOP BORDERS SCHOOL, INC., MOTHER MARY LANGE CATHOLIC SCHOOL, INC., ARCHBISHOP CURLEY HIGH SCHOOL, INC., ST. AGNES CATHOLIC SCHOOL, INC., MONSIGNOR SLADE CATHOLIC SCHOOL, INC., ROSA PARK SCHOOL, INC., ST. JOHN THE EVANGELIST, LONG GREEN VALLEY, CATHOLIC SCHOOL, INC., OUR LADY OF HOPE/ST. LUKE SCHOOL, INC., ST. PHILIP NERI SCHOOL, INC., SACRED HEART, GLYNDON, INTER-PARISH SCHOOL, INC., ST. URSULA SCHOOL, INC., SCHOOL OF THE INCARNATION, INC., ARCHBISHOP SPALDING HIGH SCHOOL, INC., THE JOHN CARROLL SCHOOL, INC., OUR LADY OF MOUNT CARMEL SCHOOL, INC., ST. AUGUSTINE SCHOOL, INC., ST. JOHN, WESTMINSTER, CATHOLIC SCHOOL, INC., ST. JOHN REGIONAL CATHOLIC SCHOOL, INC., RESURRECTION/ST. PAUL SCHOOL, INC., BISHOP WALSH SCHOOL, INC., ST. MARIA GORETTI HIGH SCHOOL, INC. FATHER CHARLES A. HALL, SSJ CATHOLIC SCHOOL, INC., MOTHER MARY LANGE SCHOOL, INC., NEUMANN EARLY CHILDHOOD CENTER, INC., ST. THOMAS AQUINAS SCHOOL, INC., THE ARCHDIOCESAN DAY CAMP, INCORPORATED, MONSIGNOR O'DWYER RETREAT HOUSE, THE ST. LEO'S ITALIAN ORPHAN ASYLUM OF THE STATE OF MARYLAND, INCORPORATED, OUR LADY OF GRACE ROMAN CATHOLIC CONGREGATION, INCORPORATED

(INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO OUR LADY OF GRACE SCHOOL, INC.), OUR LADY OF THE MOUNTAINS ROMAN CATHOLIC CONGREGATION, INCORPORATED (INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO ST. AMBROSE, CRESAPTOWN, ROMAN CATHOLIC CONGREGATION INCORPORATED, ST. PATRICK'S, MT. SAVAGE, ROMAN CATHOLIC CONGREGATION, INCORPORATED, ST. PATRICK'S, CUMBERLAND, ROMAN CATHOLIC CONGREGATION, INCORPORATED, ST. PETER AND PAUL'S ROMAN CATHOLIC CONGREGATION, INCORPORATED, AND ST. MARY'S, CUMBERLAND, ROMAN CATHOLIC CONGREGATION, INCORPORATED), OUR LADY OF VICTORY ROMAN CATHOLIC CONGREGATION, INCORPORATED (INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO OUR LADY OF VICTORY SCHOOL, INC.), ST. FRANCIS OF ASSISI, BRUNSWICK, ROMAN CATHOLIC CONGREGATION, INCORPORATED, ST. MARY MISSION, ST. GABRIEL ROMAN CATHOLIC CONGREGATION, INC. (INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO JOHN PAUL REGIONAL CATHOLIC SCHOOL, INC., ST. LAWRENCE ROMAN CATHOLIC CONGREGATION, INCORPORATED AND THE SHRINE OF OUR LADY OF PERPETUAL HELP, WOODLAWN, ROMAN CATHOLIC CONGREGATION), ST. JANE FRANCES DE CHANTAL, RIVIERA BEACH, ROMAN CATHOLIC CONGREGATION, INCORPORATED (INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO ST. JANE FRANCES SCHOOL), ST. JOSEPH'S, ODENTON, ROMAN CATHOLIC CONGREGATION, INCORPORATED (INDIVIDUALLY AND AS SUCCESSOR-IN-INTEREST TO CHURCH OF THE HOLY APOSTLES ROMAN CATHOLIC CONGREGATION, INCORPORATED), ST. LAWRENCE'S, JESSUP, ROMAN CATHOLIC CONGREGATION, INCORPORATED, ST. MICHAEL-ST. CLEMENT SCHOOL, INC. (INDIVIDUALLY AND AS SUCCESSOR IN INTEREST TO ST. CLEMENT MARY HOFBAUER SCHOOL, INC. AND ST.

MICHAEL THE ARCHANGEL SCHOOL, INC.),
CHURCH OF ST. PETER THE APOSTLE,
OAKLAND ROMAN CATHOLIC CONGREGATION,
INCORPORATED, IMMACULATE CONCEPTION
ST PETER MISSION, ST. PIUS X ROMAN
CATHOLIC CONGREGATION, INCORPORATED,
ST. THOMAS AQUINAS ROMAN CATHOLIC
CONGREGATION, INCORPORATED
(INDIVIDUALLY AND AS SUCCESSOR-IN-
INTEREST TO ST. THOMAS AQUINAS SCHOOL,
INC.), DIVINE MERCY ROMAN CATHOLIC
CONGREGATION, INCORPORATED
(INDIVIDUALLY AND AS SUCCESSOR-IN-
INTEREST TO ST. ANN'S NORTHERN GARRETT
COUNTY, ROMAN CATHOLIC CONGREGATION,
INCORPORATED, ST. PETER'S, WESTERNPORT,
ROMAN CATHOLIC CONGREGATION,
INCORPORATED, ST. GABRIEL'S, BARTON,
ROMAN CATHOLIC CONGREGATION,
INCORPORATED, CHURCH, ST. MARY OF THE
ANNUNCIATION, LONACONING, ROMAN
CATHOLIC CONGREGATION, INCORPORATED,
CHURCH OF ST. MICHAEL, FROSTBURG,
ROMAN CATHOLIC CONGREGATION,
INCORPORATED, AND ST. JOSEPH'S MIDLAND,
ROMAN CATHOLIC CONGREGATION,
INCORPORATED), CHRIST THE KING, GLEN
BURNIE, ROMAN CATHOLIC CONGREGATION,
INCORPORATED (INDIVIDUALLY AND AS
SUCCESSOR-IN-INTEREST TO CHURCH OF THE
GOOD SHEPHERD ROMAN CATHOLIC
CONGREGATION, INCORPORATED, HOLY
TRINITY ROMAN CATHOLIC CONGREGATION,
INCORPORATED, AND CHURCH OF THE
CRUCIFIXION ROMAN CATHOLIC
CONGREGATION, INCORPORATED),
SS. JAMES AND JOHN CATHOLIC SCHOOL, INC.,
HOLY ANGELS CATHOLIC SCHOOL, INC., SETON
KEOUGH HIGH SCHOOL, INC., CATHOLIC
COMMUNITY OF ASCENSION AND ST.
AUGUSTINE ROMAN CATHOLIC
CONGREGATION, INCORPORATED
(INDIVIDUALLY AND AS SUCCESSOR-IN-
INTEREST TO CHURCH OF THE ASCENSION
ROMAN CATHOLIC CONGREGATION,
INCORPORATED AND ST. AUGUSTINE'S ROMAN

CATHOLIC CONGREGATION, INCORPORATED),
CATHOLIC COMMUNITY OF SOUTH
BALTIMORE ROMAN CATHOLIC
CONGREGATION, INCORPORATED
(INDIVIDUALLY AND AS SUCCESSOR-IN-
INTEREST TO HOLY CROSS ROMAN CATHOLIC
CONGREGATION, INCORPORATED, OUR LADY
OF GOOD COUNSEL ROMAN CATHOLIC
CONGREGATION, INCORPORATED AND ST.
MARY, STAR OF THE SEA ROMAN CATHOLIC
CONGREGATION, INCORPORATED), CHURCH OF
THE IMMACULATE CONCEPTION ROMAN
CATHOLIC CONGREGATION, INCORPORATED,
ST. GREGORY THE GREAT, ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST. PIUS V
ROMAN CATHOLIC CONGREGATION,
INCORPORATED, TRANSFIGURATION ROMAN
CATHOLIC CONGREGATION, INCORPORATED
(AS ITSELF AND AS SUCCESSOR IN INTEREST
TO ST. JEROME'S ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST.
MARTIN'S ROMAN CATHOLIC CONGREGATION,
INCORPORATED, AND ST. PETER THE APOSTLE
ROMAN CATHOLIC CONGREGATION,
INCORPORATED), ST. JOSEPH'S PASSIONIST
MONASTERY PARISH ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST.
WILLIAM OF YORK ROMAN CATHOLIC
CONGREGATION, INCORPORATED, SAINT
BERNARDINE'S ROMAN CATHOLIC
CONGREGATION, INCORPORATED, SAINT
EDWARD'S ROMAN CATHOLIC
CONGREGATION, INCORPORATED , SAINT
CECILIA'S ROMAN CATHOLIC CONGREGATION,
INCORPORATED, ALL SAINTS ROMAN
CATHOLIC CONGREGATION, INCORPORATED
(INDIVIDUALLY AND AS SUCCESSOR IN
INTEREST TO OUR LADY OF LOURDES, ROMAN
CATHOLIC CONGREGATION, INCORPORATED),
ST. PHILIP AND JAMES ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST. MARY'S
ROMAN CATHOLIC CONGREGATION,
INCORPORATED, ST. MATTHEW'S ROMAN
CATHOLIC CHURCH CONGREGATION,
INCORPORATED, SAINT ANTHONY OF PADUA
ROMAN CATHOLIC CONGREGATION,

INCORPORATED, MOST PRECIOUS BLOOD
ROMAN CATHOLIC CONGREGATION,
INCORPORATED, OUR LADY OF FATIMA
ROMAN CATHOLIC CONGREGATION,
INCORPORATED, ST. ATHANASIUS ROMAN
CATHOLIC CONGREGATION, INCORPORATED,
ST. CASIMIR'S ROMAN CATHOLIC
CONGREGATION, INCORPORATED
(INDIVIDUALLY AND SUCCESSOR-IN-INTEREST
TO ST. BRIGID'S ROMAN CATHOLIC
CONGREGATION, INCORPORATED AND ST.
ELIZABETH'S ROMAN CATHOLIC
CONGREGATION, INCORPORATED), ST. ANN'S
ROMAN CATHOLIC CONGREGATION,
INCORPORATED, CHURCH OF THE
IMMACULATE CONCEPTION, TOWSON, ROMAN
CATHOLIC CONGREGATION, INCORPORATED,
ST. ISAAC JOGUES ROMAN CATHOLIC
CONGREGATION, INCORPORATED, THE
CATHOLIC COMMUNITY OF ST. FRANCIS
XAVIER ROMAN CATHOLIC CONGREGATION,
INC., CHURCH OF THE ANNUNCIATION ROMAN
CATHOLIC CONGREGATION, INCORPORATED,
ST. CLEMENT'S ROMAN CATHOLIC
CONGREGATION, INCORPORATED, OUR LADY
OF MT. CARMEL ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST. JOHN
THE EVANGELIST'S, LONG GREEN VALLEY,
ROMAN CATHOLIC CONGREGATION
INCORPORATED, ST. STEPHEN ROMAN
CATHOLIC CONGREGATION, INCORPORATED,
ST. BERNADETTE ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST. PHILIP
NERI ROMAN CATHOLIC CONGREGATION,
INCORPORATED, ST. JOSEPH HALFWAY ROMAN
CATHOLIC CONGREGATION, INCORPORATED,
ST. IGNATIUS LOYOLA, URBANA, ROMAN
CATHOLIC CONGREGATION, INCORPORATED,
ST. TIMOTHY ROMAN CATHOLIC
CONGREGATION, INC., OUR LADY OF MOUNT
CARMEL, THURMONT, ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST.
JOSEPH'S, SYKESVILLE, ROMAN CATHOLIC
CONGREGATION, INCORPORATED, ST. PAUL
THE APOSTLE ROMAN CATHOLIC
CONGREGATION, INC., SAINT FRANCIS OF

ASSISI, HOWARD COUNTY, ROMAN CATHOLIC CONGREGATION, INCORPORATED; FOURTEEN HOLY MARTYRS ROMAN CATHOLIC CHURCH; ST. BENEDICT ROMAN CATHOLIC CONGREGATION, INC.; ST. MARY'S PETERSVILLE, ROMAN CATHOLIC CONGREGATION, INCORPORATED, ST. JOHN NEUMANN SCHOOL, INC., CHURCH OF THE IMMACULATE CONCEPTION, ROMAN CATHOLIC CONGREGATION, INCORPORATED, ST. LAWRENCE'S, JESSUP, ROMAN CATHOLIC CONGREGATION, INCORPORATED, ST. PATRICK, LITTLE ORLEANS, ROMAN CATHOLIC CONGREGATION, INCORPORATED, ST. ANDREW'S ROMAN CATHOLIC CONGREGATION, INCORPORATED, CHRIST THE KING ROMAN CATHOLIC CONGREGATION, INCORPORATED, ST. GERARD'S CHAPEL, HIGHLANDTOWN, HOLY REDEEMER CHAPEL, HIGHLANDTOWN, ROMAN CATHOLIC CONGREGATION, INCORPORATED, BALTIMORE, ST. STANISLAUS KOSTKA ROMAN CATHOLIC CONGREGATION, CARDINAL GIBBONS SCHOOL, INC., ST. AUGUSTINE'S HALL, ST. JAMES' POINT OF ROCKS ROMAN CATHOLIC CONGREGATION, INCORPORATED, AND ST. PAUL'S ROMAN CATHOLIC CONGREGATION, INCORPORATED,

Plaintiffs,

v.

AMERICAN CASUALTY COMPANY OF READING, PENNSYLVANIA, EMPLOYERS INSURANCE COMPANY OF WAUSAU (F/K/A EMPLOYERS INSURANCE OF WAUSAU A MUTUAL COMPANY F/K/A EMPLOYERS MUTUAL LIABILITY INSURANCE COMPANY OF WISCONSIN), FEDERAL INSURANCE COMPANY, FIREMAN'S FUND INSURANCE COMPANY, GENERAL STAR INDEMNITY COMPANY, INDEMNITY INSURANCE COMPANY OF NORTH AMERICA, INSURANCE COMPANY OF NORTH AMERICA, NATIONAL UNION FIRE INSURANCE COMPANY OF PITTSBURGH, PA, NEW HAMPSHIRE

INSURANCE COMPANY, NORTHFIELD
INSURANCE COMPANY, ST. PAUL FIRE &
MARINE INSURANCE COMPANY, THE
AMERICAN INSURANCE COMPANY, HARTFORD
ACCIDENT & INDEMNITY COMPANY,
HARTFORD CASUALTY INSURANCE COMPANY,
HARTFORD FIRE INSURANCE COMPANY,
TRAVELERS CASUALTY AND SURETY
COMPANY (SUCCESSOR-IN-INTEREST TO
AETNA CASUALTY AND SURETY COMPANY),
TWIN CITY FIRE INSURANCE COMPANY,
UNITED STATES FIRE INSURANCE COMPANY.
U.S. FIDELITY AND GUARANTY COMPANY, AND
THE CONTINENTAL INSURANCE COMPANY
(SUCCESSOR-IN-INTEREST TO GLENS FALLS
INSURANCE COMPANY F/K/A FIDELITY-
PHOENIX INSURANCE COMPANY), ZURICH
AMERICAN INSURANCE COMPANY (F/K/A
MARYLAND CASUALTY COMPANY),
WESTCHESTER FIRE INSURANCE COMPANY,

Defendants.

COMPLAINT

Plaintiffs Debtor Roman Catholic Archbishop of Baltimore, a Corporation Sole (“Archdiocese”), by and through its attorneys, YVS Law, LLC and Blank Rome LLP; and the parishes, schools, and other affiliated entities named herein (collectively, “Parishes”), by and through their attorneys ELSAESSER ANDERSON, CHTD., (collectively, “Plaintiffs”) bring this Complaint against Defendants American Casualty Company of Reading, Pennsylvania, Employers Insurance Company of Wausau (f/k/a Employers Insurance of Wausau A Mutual Company f/k/a Employers Mutual Liability Insurance Company of Wisconsin), Federal Insurance Company, Fireman’s Fund Insurance Company, General Star Indemnity Company, Indemnity Insurance Company of North America, Insurance Company of North America, National Union Fire Insurance Company of Pittsburgh, PA, New Hampshire Insurance Company, Northfield Insurance Company, St. Paul Fire & Marine Insurance Company, The American Insurance Company, Hartford Accident & Indemnity Company, Hartford Casualty Insurance Company, Hartford Fire Insurance Company, Travelers Casualty and Surety Company (successor-in-interest to Aetna

Casualty and Surety Company), Twin City Fire Insurance Company, United States Fire Insurance Company, U.S. Fidelity and Guaranty Company, The Continental Insurance Company (successor-in-interest to Glens Falls Insurance Company (f/k/a Fidelity-Phenix Insurance Company), Zurich American Insurance Company (f/k/a Maryland Casualty Company), and Westchester Fire Insurance Company (collectively, the “Insurers” or “Defendants”) and allege as follows:

BACKGROUND

1. This is an action for breach of contract, seeking damages pursuant to the terms of certain liability insurance policies and/or certificates. Further, this is an action seeking declaratory relief to determine the extent of the rights of Plaintiffs in said insurance policies and/or certificates and the extent to which those rights may be property of the estate under 11 U.S.C. § 541.

2. Effective October 1, 2023, the Maryland General Assembly enacted the Child Victims Act of 2023 (“CVA”), which allows claimants to file and pursue previously time-barred claims alleging sexual abuse. Prior to the CVA, the statute of limitations prevented claimants from asserting such claims.

3. As a result of the CVA, claims are expected to be asserted and have been asserted against the Archdiocese and/or Parishes, alleging that the Archdiocese and/or Parishes are liable for damages stemming from purported negligence in connection with alleged sexual abuse injuries perpetrated by individual clergy members and/or lay persons (the “Underlying Actions and Claims”).

THE PARTIES

4. The Archdiocese is a not-for-profit religious corporation, existing under the laws of the State of Maryland, with the episcopal see and principal place of business in Baltimore, Maryland. The Archdiocese was established in 1789 and encompasses 10 counties in Maryland.

5. Trustees of the Catholic Cathedral Church of Baltimore (The Basilica) is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

6. St. Alphonsus' Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

7. Corpus Christi Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

8. St. Peter Claver's Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

9. St. Veronica's Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

10. St. Francis of Assisi Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

11. The Shrine of the Little Flower Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

12. Our Lady of Pompei Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

13. Sacred Heart of Jesus Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland and as successor in interest to St. Michael's Roman Catholic Congregation, Incorporated.

14. St. Rose of Lima Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

15. St. Vincent De Paul Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

16. St. Leo's, Baltimore, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

17. St. Patrick's Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

18. Holy Rosary Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

19. St. Wenceslaus' Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland and is successor in interest to St. James and St. John Roman Catholic Congregation Incorporated.

20. St. Katharine of Siena Roman Catholic Congregation, Incorporated, a now closed church, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

21. St. James the Less Roman Catholic Congregation, Incorporated, a now closed church, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

22. St. John the Evangelist Roman Catholic Congregation, Incorporated, a now closed church, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

23. St. Francis Xavier's Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland and is successor in interest to St. Paul.

24. St. Ignatius, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

25. St. Clement's, Lansdowne, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

26. St. Mark's Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

27. St. Agnes Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

28. St. Alphonsus Rodriguez, Woodstock, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

29. Holy Family Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

30. St. Charles Borromeo's Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

31. Our Lady of the Angels Catholic Community, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

32. Holy Korean Martyrs Roman Catholic Congregation, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland and as successor in interest to Korean Roman Catholic Congregation of Baltimore, Incorporated.

33. Church of the Nativity of Our Lord Jesus Christ Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

34. Sacred Heart Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

35. St. Joseph's, Texas, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

36. Immaculate Heart of Mary, Baynesville, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

37. St. Ursula's Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

38. St. Michael the Archangel, Overlea, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

39. St. Joseph's, Fullerton, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

40. Our Lady, Queen of Peace, Middle River, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

41. St. Clare's Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

42. Sacred Heart of Mary Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

43. Our Lady of Hope Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

44. St. Rita's Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

45. St. Luke's Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

46. Our Lady of La Vang Roman Catholic Congregation, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

47. St. Mark's, Fallston, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

48. St. Margaret's Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

49. St. Mary Magdalen, Bel Air, is a mission of St. Margaret's Roman Catholic Congregation, Incorporated.

50. St. Ignatius', Hickory, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

51. St. Mary's Pylesville, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland and as successor in interest to St. Paul's, Cardiff, Roman Catholic Congregation, Incorporated.

52. Church of the Holy Spirit Roman Catholic Congregation Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

53. Prince of Peace Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

54. St. Francis De Sales, Abingdon, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

55. St. Joan of Arc Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

56. St. Patrick's, Havre De Grace, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

57. Saint Dominic's Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

58. St. Thomas More Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

59. Blessed Sacrament Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

60. The Cathedral of Mary Our Queen Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

61. The Shrine of the Sacred Heart Roman Catholic Congregation Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

62. St. Thomas Aquinas Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

63. St. Ambrose Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

64. The Resurrection of Our Lord, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

65. Our Lady of the Fields, Millersville, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

66. St. Elizabeth Ann Seton Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

67. Our Lady of the Chesapeake Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

68. St. John the Evangelist, Severna Park, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

69. St. Andrew by the Bay Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

70. St. Mary's, Annapolis Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

71. St. John Neuman Church is a mission owned and operated by St. Mary's, Annapolis Roman Catholic Congregation, Incorporated.

72. Our Lady of Perpetual Help, Edgewater Roman Catholic Congregation is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

73. Holy Family, Davidsonville, Roman Catholic Congregation Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

74. Our Lady of Sorrows Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

75. St. Peter's Hancock, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

76. St. Michael's, Clear Spring, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

77. St. Augustine's Williamsport, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

78. St. Mary's, Hagerstown, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

79. St. Ann, Hagerstown, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

80. St. James', Boonsboro, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

81. St. Joseph's-On-Carrollton Manor Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

82. St. John the Evangelist's, Frederick, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

83. St. Peter's Libertytown, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

84. St. Anthony's Shrine, Emmitsburg, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

85. St. Joseph's Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

86. Holy Family Catholic Community Of Middletown, Roman Catholic Congregation, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

87. St. Katharine Drexel Roman Catholic Congregation, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

88. St. Joseph's, Taneytown, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

89. St. Bartholomew's, Manchester, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

90. St. John's, Westminster, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

91. St. Michael's Poplar Springs, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

92. St. Louis' Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

93. St. John the Evangelist, Columbia, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

94. Church of the Resurrection Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

95. Our Lady of Perpetual Help Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

96. Associated Catholic Charities, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

97. Cardinal Shehan School, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

98. Archbishop Borders School, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

99. Mother Mary Lange Catholic School, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

100. Archbishop Curley High School, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

101. St. Agnes Catholic School, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

102. Monsignor Slade Catholic School, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

103. Rosa Park School, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

104. St. John the Evangelist, Long Green Valley, Catholic School, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

105. Our Lady of Hope/St. Luke School, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

106. St. Philip Neri School, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

107. Sacred Heart, Glyndon, Inter-Parish School, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

108. St. Ursula School, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

109. School of the Incarnation, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

110. Archbishop Spalding High School, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

111. The John Carroll School, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

112. Our Lady of Mount Carmel School, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

113. St. Augustine School, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

114. St. John, Westminster, Catholic School, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

115. St. John Regional Catholic School, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

116. Resurrection/St. Paul School, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

117. Bishop Walsh School, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

118. St. Maria Goretti High School, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

119. Father Charles A. Hall, SSJ Catholic School, Inc., a now closed entity, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

120. Mother Mary Lange School, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

121. Neumann Early Childhood Center, Inc., a now closed entity, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

122. St. Thomas Aquinas School, Inc., a now closed entity, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

123. The Archdiocesan Day Camp, Incorporated, a now closed entity, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

124. Monsignor O'Dwyer Retreat House, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

125. The St. Leo's Italian Orphan Asylum of the State of Maryland, Incorporated, a now closed entity, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

126. Our Lady of Grace Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland and is successor-in-interest to Our Lady of Grace School, Inc.

127. Our Lady of the Mountains Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland and is successor-in-interest to St. Ambrose Cresaptown Roman Catholic Congregation Incorporated, St. Patrick's, Mt. Savage, Roman Catholic Congregation, Incorporated, St. Patrick's, Cumberland, Roman Catholic Congregation, Incorporated, St. Peter and Paul's Roman Catholic Congregation, Incorporated, and St. Mary's, Cumberland, Roman Catholic Congregation, Incorporated.

128. Our Lady of Victory Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland and is successor-in-interest to Our Lady of Victory School, Inc.

129. St. Francis of Assisi, Brunswick, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

130. St. Mary Mission is a mission owned and operated by St. Francis of Assisi, Brunswick, Roman Catholic Congregation, Incorporated.

131. St. Gabriel Roman Catholic Congregation, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland and is successor-in-interest to John Paul Regional Catholic School, Inc., St. Lawrence Roman Catholic Congregation, Incorporated and the Shrine of Our Lady of Perpetual Help, Woodlawn, Roman Catholic Congregation.

132. St. Jane Frances De Chantal, Riviera Beach, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland and as successor in interest to St. Jane Frances School, Inc..

133. St. Joseph's, Odenton, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland and is successor-in-interest to Church of the Holy Apostles Roman Catholic Congregation Incorporated.

134. St. Michael-St. Clement School, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland and as successor in interest to St. Clement Mary Hofbauer School, Inc. and St. Michael the Archangel School, Inc.

135. Church of St. Peter the Apostle, Oakland Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

136. Immaculate Conception St Peter Mission is a mission owned and operated by the Church of St. Peter the Apostle, Oakland Roman Catholic Congregation, Incorporated.

137. St. Pius X Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

138. St. Thomas Aquinas Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland and is successor-in-interest to St. Thomas Aquinas School, Inc.

139. Divine Mercy Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland and is successor-in-interest to St. Ann's Northern Garrett County, Roman Catholic Congregation, Incorporated, St. Peter's, Westernport, Roman Catholic Congregation, Incorporated, St. Gabriel's, Barton, Roman Catholic Congregation, Incorporated, St. Mary of the Annunciation, Lonaconing, Roman Catholic Congregation, Incorporated, the Church of St. Michael, Frostburg, Roman Catholic Congregation, Incorporated, and St. Joseph's Midland, Roman Catholic Congregation, Incorporated.

140. Christ the King, Glen Burnie, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland and is successor-in-interest to Church of the Good Shepherd Roman Catholic Congregation, Incorporated, Holy Trinity Roman Catholic Congregation, Incorporated, and Church of the Crucifixion Roman Catholic Congregation, Incorporated.

141. SS. James and John Catholic School, Inc. is a now closed entity that is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with their principal place of business located in the State of Maryland.

142. Holy Angels Catholic School, Inc., is a now closed entity that is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with their principal place of business located in the State of Maryland.

143. Seton Keough High School, Inc. is a now closed entity that is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with their principal place of business located in the State of Maryland.

144. Catholic Community of Ascension and St. Augustine Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland and is successor-in-interest to Church of the Ascension Roman Catholic Congregation, Incorporated and St. Augustine's Roman Catholic Congregation, Incorporated.

145. Catholic Community of South Baltimore Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland and is successor-in-interest to Holy Cross Roman Catholic Congregation, Incorporated, Our Lady of Good Counsel Roman Catholic Congregation, Incorporated and St. Mary, Star of the Sea, Roman Catholic Congregation, Incorporated.

146. Church of the Immaculate Conception Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

147. St. Gregory the Great, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

148. St. Pius V Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

149. Transfiguration Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland and is successor in interest to St. Jerome's Roman Catholic Congregation, Incorporated, St. Martin's Roman Catholic Congregation, Incorporated, and St. Peter The Apostle Roman Catholic Congregation, Incorporated.

150. St. Joseph's Passionist Monastery Parish Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

151. St. William of York Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

152. Saint Bernardine's Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

153. Saint Edward's Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

154. Saint Cecilia's Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

155. All Saints Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland,

with its principal place of business located in the State of Maryland and successor in interest to Our Lady of Lourdes, Roman Catholic Congregation Incorporated.

156. St. Philip and James' Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

157. St. Mary's Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

158. St. Matthew's Roman Catholic Church Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

159. Saint Anthony of Padua Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

160. Most Precious Blood Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

161. Our Lady of Fatima Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

162. St. Athanasius Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

163. St. Casimir's Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland and is successor-in-interest to St. Brigid's Roman Catholic Congregation, Incorporated and St. Elizabeth's Roman Catholic Congregation, Incorporated.

164. St. Ann's Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

165. Church of the Immaculate Conception, Towson, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

166. St. Isaac Jogues Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

167. The Catholic Community of St. Francis Xavier Roman Catholic Congregation, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

168. Church of the Annunciation Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

169. St. Clement's Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

170. Our Lady of Mt. Carmel Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

171. St. John the Evangelist's, Long Green Valley, Roman Catholic Congregation Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

172. St. Stephen Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

173. St. Bernadette Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

174. St. Philip Neri Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

175. St. Joseph Halfway Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

176. St. Ignatius Loyola, Urbana, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

177. St. Timothy Roman Catholic Congregation, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

178. Our Lady of Mount Carmel, Thurmont, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

179. St. Joseph's, Sykesville, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

180. St. Paul the Apostle Roman Catholic Congregation, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

181. Saint Francis of Assisi, Howard County, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

182. On information and belief, Fourteen Holy Martyrs Roman Catholic Church is a former Catholic church with its principal place of business located in the State of Maryland.

183. St. Benedict Roman Catholic Congregation, Inc. is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

184. St. Alphonsus Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

185. St. Mary's Petersville, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

186. St. John Neumann School, Inc., a now closed entity, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

187. St. John Neumann Mission Church, Annapolis is a mission of St. Mary's, Annapolis Roman Catholic Church, Incorporated.

188. Church Of The Immaculate Conception, Roman Catholic Congregation, Incorporated, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

189. St. Lawrence's, Jessup, Roman Catholic Congregation, Incorporated, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

190. St. Patrick, Little Orleans, Roman Catholic Congregation, Incorporated is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland and a mission of St. Peter's, Hancock, Roman Catholic Congregation, Incorporated.

191. St. Andrew's Roman Catholic Congregation, Incorporated, a now closed entity, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

192. Christ The King Roman Catholic Congregation, Incorporated, a now closed church, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

193. St. Gerard's Chapel, Highlandtown, is a now closed church that was located in the State of Maryland.

194. Holy Redeemer Chapel, Highlandtown, is a now closed church that was located in the State of Maryland.

195. St. Stanislaus Kostka Roman Catholic Congregation, Incorporated, a now closed church, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

196. Cardinal Gibbons School, Inc., a now closed entity, is a not-for-profit religious corporation duly organized and existing under and by virtue of the laws of the State of Maryland, with its principal place of business located in the State of Maryland.

197. St. Augustine's Hall, a now closed entity, is a not-for-profit entity located in the State of Maryland.

198. St. James' Point of Rocks Roman Catholic Congregation, Incorporated, a now closed church, is a not-for-profit entity located in the State of Maryland.

199. St. Paul's Roman Catholic Congregation, Incorporated, a now closed church, is a not-for-profit entity located in the State of Maryland.

200. Upon information and belief, American Casualty Company of Reading, Pennsylvania (“American Casualty”) is a corporation organized under the laws of Pennsylvania, with its principal place of business in Chicago, Illinois. Upon information and belief, American Casualty operates in the State of Maryland and sold or is otherwise responsible for insurance policies and/or certificates providing coverage for all or some Plaintiffs, including the Archdiocese.

201. Upon information and belief, Employers Insurance Company of Wausau (“Employers Wausau”) is a corporation organized under the laws of Wisconsin, with its principal place of business in Boston, Massachusetts. Upon information and belief, Employers Wausau operates in the State of Maryland and sold insurance policies and/or certificates providing coverage to the Archdiocese for certain time frames during which the underlying claimants may allege abuse. Upon information and belief, Employers Wausau was formerly known as Employers Insurance of Wausau a Mutual Company, which was formerly known as Employers Mutual Liability Insurance Company of Wisconsin, which sold or is otherwise responsible for insurance policies and/or certificates providing coverage for all or some Plaintiffs, including the Archdiocese.

202. Upon information and belief, Federal Insurance Company (“Federal”) is a corporation organized under the laws of Indiana with its principal place of business in Whitehouse Station, New Jersey. Upon information and belief, Federal operates in the State of Maryland and sold or is otherwise responsible for insurance policies and/or certificates providing coverage for all or some Plaintiffs, including the Archdiocese.

203. Upon information and belief, Fireman’s Fund Insurance Company (“Fireman’s Fund”) is a corporation organized under the laws of California with its principal place of business in Chicago, Illinois. Upon information and belief, Fireman’s Fund operates in the State of Maryland and sold or is otherwise responsible for insurance policies and/or certificates providing coverage for all or some Plaintiffs, including the Archdiocese.

204. Upon information and belief, General Star Indemnity Company (“General Star”) is a corporation organized under the laws of Delaware, with its principal place of business in

Stamford, Connecticut. Upon information and belief, General Star operates in the State of Maryland and sold or is otherwise responsible for insurance policies and/or certificates providing coverage for all or some Plaintiffs, including the Archdiocese.

205. Upon information and belief, Indemnity Insurance Company of North America (“IINA”) is a corporation organized under the laws of Pennsylvania, with its principal place of business in Philadelphia, Pennsylvania. Upon information and belief, IINA operates in the State of Maryland and sold or is otherwise responsible for insurance policies and/or certificates providing coverage for all or some Plaintiffs, including the Archdiocese.

206. Upon information and belief, Insurance Company of North America (“INA”) is a corporation organized under the laws of Pennsylvania, with its principal place of business in Philadelphia, Pennsylvania. Upon information and belief, INA operates in the state of Maryland and sold or is otherwise responsible for insurance policies and/or certificates providing coverage for all or some Plaintiffs, including the Archdiocese.

207. Upon information and belief, National Union Fire Insurance Company of Pittsburgh, PA (“National Union”) is a corporation organized under the laws of Pennsylvania, with its principal place of business in Harrisburg, Pennsylvania. Upon information and belief, National Union operates in the State of Maryland and sold or is otherwise responsible for insurance policies and/or certificates providing coverage for all or some Plaintiffs, including the Archdiocese.

208. Upon information and belief, New Hampshire Insurance Company (“New Hampshire”) is a corporation organized under the laws of Illinois, with its principal place of business in New York, New York. Upon information and belief, New Hampshire operates in the state of Maryland and sold or is otherwise responsible for insurance policies and/or certificates providing coverage for all or some Plaintiffs, including the Archdiocese.

209. Upon information and belief, Northfield Insurance Company (“Northfield”) is a corporation organized under the laws of Iowa, with its principal place of business in Hartford, Connecticut. Upon information and belief, Northfield operates in the state of Maryland and sold or is otherwise responsible for insurance policies and/or certificates providing coverage for all or some Plaintiffs, including the Archdiocese.

210. Upon information and belief, St. Paul Fire & Marine Insurance Company (“St. Paul F&M”) is a corporation organized under the laws of Connecticut, with its principal place of business in Hartford, Connecticut. Upon information and belief, St. Paul F&M operates in the State of Maryland and sold or is otherwise responsible for insurance policies and/or certificates providing coverage for all or some Plaintiffs, including the Archdiocese.

211. Upon information and belief, The American Insurance Company (“American”) is a corporation organized under the laws of Ohio with its principal place of business in Chicago, Illinois. Upon information and belief, American operates in the State of Maryland and sold or is otherwise responsible for insurance policies and/or certificates providing coverage for all or some Plaintiffs, including the Archdiocese.

212. Upon information and belief, Hartford Accident and Indemnity Company (“Hartford Accident”), is a corporation organized under the laws of Connecticut, with its principal place of business in Hartford, Connecticut. Upon information and belief, Hartford Accident sold or is otherwise responsible for insurance policies and/or certificates providing coverage for all or some Plaintiffs, including the Archdiocese.

213. Hartford Casualty Insurance Company (“Hartford Casualty”) is a corporation organized under the laws of Indiana, with its principal place of business in Hartford, Connecticut. Upon information and belief, Hartford Casualty operates in the State of Maryland and sold or is otherwise responsible for insurance policies and/or certificates providing coverage for all or some Plaintiffs, including the Archdiocese.

214. Hartford Fire Insurance Company (“Hartford Fire”) is a corporation organized under the laws of Connecticut, with its principal place of business in Hartford, Connecticut. Upon information and belief, Hartford Fire operates in the State of Maryland and sold or is otherwise responsible for insurance policies and/or certificates providing coverage for all or some Plaintiffs, including the Archdiocese.

215. Upon information and belief, Travelers Casualty and Surety Company (“Travelers Casualty”), as successor-in-interest to Aetna Casualty and Surety Company (“Aetna Casualty”) is a corporation organized under the laws of Connecticut with its principal place of business in

Hartford, Connecticut. Upon information and belief, Travelers Casualty operates in the State of Maryland and was formerly known as Aetna Casualty, which sold or is otherwise responsible for insurance policies and/or certificates providing coverage for all or some Plaintiffs, including the Archdiocese.

216. Upon information and belief, Twin City Fire Insurance Company (“Twin City”) is a corporation organized under the laws of Indiana, with its principal place of business in Hartford, Connecticut. Upon information and belief, Twin City operates in the State of Maryland and sold or is otherwise responsible for insurance policies and/or certificates providing coverage for all or some Plaintiffs, including the Archdiocese.

217. Upon information and belief, United States Fire Insurance Company (“US Fire”) is a corporation organized under the laws of Delaware, with its principal place of business in Morristown, New Jersey. Upon information and belief, US Fire operates in the State of Maryland and sold or is otherwise responsible for insurance policies and/or certificates providing coverage for all or some Plaintiffs, including the Archdiocese.

218. Upon information and belief, U.S. Fidelity and Guaranty Company (“USF&G”) is a corporation organized under the laws of Connecticut, with its principal place of business in Hartford, Connecticut. Upon information and belief, USF&G operates in the State of Maryland and sold or is otherwise responsible for insurance policies and/or certificates providing coverage for all or some Plaintiffs, including the Archdiocese.

219. Upon information and belief, The Continental Insurance Company (“Continental”) is a corporation organized under the laws of Pennsylvania, with its principal place of business in Chicago, Illinois. Upon information and belief Continental operates in the State of Maryland and is the successor to Glens Falls Insurance Company formerly known as Fidelity-Phenix Insurance Company which sold or is otherwise responsible for insurance policies and/or certificates providing coverage for all or some Plaintiffs, including the Archdiocese.

220. Upon information and belief, Zurich American Insurance Company (“Zurich”), as successor in interest to Maryland Casualty Company (“Maryland”), is a corporation organized under the laws of New York, with its principal place of business in Schaumburg, Illinois. Upon

information and belief, Zurich operates in the State of Maryland and is the successor to Maryland or one or more other insurance companies operating under the Zurich Insurance Group, which sold or is otherwise responsible for insurance policies and/or certificates providing coverage for all or some Plaintiffs, including the Archdiocese.

221. Upon information and belief, Westchester Fire Insurance Company (“Westchester”) is a corporation organized under the laws of Pennsylvania, with its principal place of business in Philadelphia, Pennsylvania. Upon information and belief, Westchester operates in the State of Maryland and sold or is otherwise responsible for insurance policies and/or certificates providing coverage for all or some Plaintiffs, including the Archdiocese.

222. Upon information and belief, The Glen Falls Insurance Company (“Glen Falls”) is a corporation organized under the laws of Delaware, with its principal place of business in Wilmington, Delaware. Upon information and belief, Glen Falls operates in the State of Maryland and sold or is otherwise responsible for insurance policies and/or certificates providing coverage for all or some Plaintiffs.

JURISDICTION AND VENUE

223. On or about September 29, 2023, the Archdiocese filed a voluntary petition under Chapter 11 of the United States Bankruptcy Code, 11 U.S.C. §§ 101 *et seq.*

224. Pursuant to §§ 1107 and 1108 of the Bankruptcy Code, the Archdiocese continues to operate and manage its property as a debtor-in-possession.

225. This Court has personal jurisdiction over each of the Defendants because each of the Defendants has sufficient contacts with the State of Maryland. Further, each otherwise availed itself of the markets of Maryland.

226. This Court has subject matter jurisdiction as this adversary proceeding is a core proceeding pursuant to 28 U.S.C. § 157 insofar as it seeks to determine the extent and nature of the interests of the bankruptcy estate in certain policies and/or certificates and rights under said policies and/or certificates of insurance, under 11 U.S.C. § 541.

227. Alternatively, this Court has subject matter jurisdiction pursuant to 28 U.S.C. §1334(b) because this is an action arising in or related to the Archdiocese's bankruptcy proceeding, which is a case under Title 11 of the United States Code.

228. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(a) and 1391(b) because a substantial part of the events or omissions giving rise to the dispute occurred in this District, including the issuance of the respective insurance policies and/or certificates at issue.

THE INSURANCE POLICIES

229. Upon information and belief, at various times from at least 1956 to the present, in consideration of premiums paid by the Archdiocese and/or the Parishes, the Insurers, among others, sold or became responsible for primary general liability insurance policies and/or certificates sold to the Archdiocese and/or Parishes, as well as certain umbrella and/or excess liability policies and/or certificates that provide coverage for the Archdiocese and/or Parishes (the "Insurance Policies").

230. Upon information and belief, each of the Insurance Policies requires the Insurers to pay all sums that the insureds become legally obligated to pay as a result of bodily injury, as long as any part of the injury took place, or with regard to certain Insurance Policies a claim was made, during the policy period.

231. Upon information and belief, each of the Insurance Policies also requires the Insurers to pay defense costs and expenses, including attorneys' fees, incurred by the insureds in the investigation and defense of the Underlying Actions and Claims. This obligation applies even if the allegations against the insured are groundless, false, or fraudulent.

232. Upon information and belief, the Archdiocese and/or Parishes, timely paid all premiums due under the Insurance Policies.

THE UNDERLYING ACTIONS AND CLAIMS

233. The claimants in the Underlying Actions and Claims allege or may allege that the Archdiocese and/or Parishes were negligent and the claimants suffered injuries resulting from alleged sexual abuse.

234. The Archdiocese and/or Parishes have fulfilled or will fulfill all of their duties and conditions under each of the Insurance Policies.

235. The Archdiocese and Parishes are entitled to all benefits provided by the Insurance Policies.

236. The Underlying Actions and Claims are covered by the Insurance Policies.

237. The Insurers have failed to acknowledge, or will fail to acknowledge, their full coverage obligations to (a) defend or pay for the defense of the Archdiocese and/or Parishes and/or (b) indemnify the Archdiocese and/or Parishes, including the funding of any settlements or judgments.

238. By failing to acknowledge their full coverage obligations to defend and/or indemnify the Archdiocese and/or Parishes in connection with some or all of the Underlying Actions and Claims, the Insurers have breached or will be in breach of their contractual obligations to the Archdiocese and/or Parishes. Consequently, an actual and justiciable claim exists as to all Insurers named in this action.

COUNT I

Declaratory Judgment Against All Insurers– Duty to Defend

239. The Archdiocese and Parishes repeat and reallege each and every allegation contained in paragraphs 1 through 238 above with the same force and effect as though fully set forth herein.

240. The Archdiocese and Parishes seek a judicial determination of their rights and duties and those of the Insurers with respect to an actual controversy arising out of the Insurance Policies.

241. Pursuant to the terms of the Insurance Policies, each of the Insurers is obligated to pay in full the expenditures made by the Archdiocese and Parishes to defend against Underlying Actions and Claims.

242. The Insurers have refused or failed or will refuse or fail to accept their legal obligations to pay in full for the Archdiocese and Parishes defense of some or all of the Underlying Actions and Claims.

243. The Insurers' refusal or failure to defend the Archdiocese and Parishes constitutes a breach of the Insurance Policies.

244. An actual controversy of a justiciable nature presently exists between the Archdiocese and Parishes and the Insurers regarding the proper construction of the Insurance Policies and the respective rights and obligations of the parties thereto with respect to the Archdiocese and Parishes' defense costs attributable to some or all of the Underlying Actions and Claims. The controversy is of sufficient immediacy and magnitude to justify the issuance of a declaratory judgment.

245. The issuance of declaratory relief by this Court will terminate some or all of the existing controversy between the parties.

COUNT II

Breach of Contract Against All Insurers Seeking Damages – Duty to Defend

246. The Archdiocese and Parishes repeat and reallege each and every allegation contained in paragraphs 1 through 245 above with the same force and effect as though fully set forth herein.

247. The Archdiocese and Parishes may incur substantial damages in the form of costs to defend against Underlying Actions and Claims for which each of the Insurers is responsible pursuant to the terms of the Insurance Policies.

248. The Insurance Policies are valid and enforceable contracts providing insurance coverage for the damages incurred by the Archdiocese and Parishes.

249. The Archdiocese and Parishes have given or will give timely notice of the Underlying Actions and Claims.

250. The Archdiocese and Parishes substantially performed or will substantially perform all material obligations on their part to be performed under the Insurance Policies.

251. Each of the Insurers that received notice or will receive notice of the Underlying Actions and Claims has refused to accept, or it is anticipated will refuse to accept, its legal obligations to pay the Archdiocese and Parishes' defense costs in response to any Underlying Actions and Claims.

252. Each of the Insurers' failure to defend the Archdiocese and Parishes constitutes a breach of the Insurance Policies.

253. As a direct and proximate result of each of the Insurers' breach of the Insurance Policies, the Archdiocese and Parishes are suffering and will continue to suffer damages equal to the sums they would be entitled to recover as benefits under the Insurance Policies.

COUNT III

Declaratory Judgment Against All Insurers– Duty to Indemnify

254. The Archdiocese and Parishes repeat and reallege each and every allegation contained in paragraphs 1 through 253 above with the same force and effect as though fully set forth herein.

255. The Archdiocese and Parishes seek a judicial determination of the rights and duties of the Archdiocese and Parishes and the Insurers with respect to an actual controversy arising out of the Insurance Policies.

256. Pursuant to the terms of the Insurance Policies, each of the Insurers is obligated to indemnify the Archdiocese and Parishes for, or pay on their behalf, all sums that the Archdiocese and Parishes become obligated to pay, through judgment, settlement, or otherwise, arising out of the Underlying Actions and Claims.

257. The Insurers have refused or failed or will refuse or fail to accept their legal obligations to indemnify the Archdiocese and Parishes for the total sums that the Archdiocese and Parishes are legally obligated to pay as a result of some or all of the Underlying Actions and Claims.

258. Each of the Insurers' refusal or failure to indemnify the Archdiocese and Parishes constitutes a breach of the Policies.

259. An actual controversy of a justiciable nature presently exists between the Archdiocese and Parishes and the Insurers concerning the proper construction of the Insurance Policies and the rights and obligations of the parties thereto with respect to the Underlying Actions and Claims. The controversy is of sufficient immediacy and magnitude to justify the issuance of a declaratory judgment.

260. The issuance of declaratory relief by this Court will terminate some or all of the existing controversy between the parties.

COUNT IV

Breach of Contract Against All Insurers Seeking Damages – Duty to Indemnify

261. The Archdiocese and Parishes repeat and reallege each and every allegation contained in paragraphs 1 through 260 above with the same force and effect as though fully set forth herein.

262. The Archdiocese and Parishes may incur damages in the form of costs to pay settlements and/or judgments in the Underlying Actions and Claims for which each of the Insurers is responsible pursuant to the terms of the Insurance Policies.

263. The Policies are valid and enforceable contracts providing insurance coverage for the damages incurred by the Archdiocese and Parishes.

264. The Archdiocese and Parishes have given or will give timely notice of the Underlying Actions and Claims.

265. The Archdiocese and Parishes substantially performed or will perform all material obligations on their part to be performed under the Insurance Policies.

266. Each of the Insurers that received notice or will receive notice of the Underlying Actions and Claims has refused to accept, or it is anticipated will refuse to accept, its legal obligations to provide coverage for the Archdiocese and Parishes in response to some or all of the Underlying Actions and Claims.

267. Each of the Insurers' failure to indemnify the Archdiocese and Parishes constitutes a breach of the Insurance Policies.

268. As a direct and proximate result of each of the Insurers' breach of the Insurance Policies, the Archdiocese and Parishes are suffering and will continue to suffer damages equal to the sums they would be entitled to recover as benefits under the Insurance Policies.

PRAYER FOR RELIEF

WHEREFORE, the Archdiocese and Parishes pray for judgment as follows:

1. On Count I, the Archdiocese and Parishes request that this Court enter a declaratory judgment in favor of the Archdiocese and Parishes against each of the Insurers, declaring that each of the Insurers is severally and indivisibly obligated to pay the costs of defending the Archdiocese and Parishes against the Underlying Actions and Claims, together with attorneys' fees and costs and pre-judgment interest;

2. On Count II, the Archdiocese and Parishes request that this Court enter a judgment in favor of the Archdiocese and Parishes and severally and indivisibly against each of the Insurers that have received or will receive notice of the Underlying Actions and Claims, and award compensatory damages in an amount to be determined at trial, as well as pre-judgment and post-judgment interest on those amounts of defense costs which each of the Insurers wrongfully refused to pay the Archdiocese and Parishes, together with attorneys' fees and costs;

3. On Count III, the Archdiocese and Parishes request that this Court enter a declaratory judgment in favor of the Archdiocese and Parishes against each of the Insurers, declaring that each of the Insurers is severally obligated to indemnify the Archdiocese and Parishes for any judgments and/or settlements attributable to the Underlying Actions and Claims, together with attorneys' fees and costs and pre-judgment interest;

4. On Count IV, the Archdiocese and Parishes request that this Court enter a judgment in favor of the Archdiocese and Parishes and severally against each of the Insurers that have received or will receive notice of the Underlying Actions and Claims, and award compensatory damages in an amount to be determined at trial, as well as pre-judgment and post-judgment interest on those amounts of indemnity costs which each of the Insurers wrongfully refused to pay the Archdiocese and Parishes, together with attorneys' fees and costs;

5. Additionally, the Archdiocese and Parishes requests such other and further relief as this Court may deem just and proper.

JURY DEMAND

The Archdiocese and Parishes request a trial by jury on any issue so triable.

Dated: March 28, 2024

Respectfully submitted,

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