

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re: Chapter 11
BKY 15-30125

The Archdiocese of St. Paul and
Minneapolis,

Debtor.

AFFIDAVIT OF MARGO S. BROWNELL

STATE OF MINNESOTA)
) ss.
COUNTY OF HENNEPIN)

I, Margo S. Brownell, duly sworn, state as follows:

1. I am Special Insurance Coverage Counsel for the Official Parish Committee of Unsecured Creditors ("Parish Committee"), appointed by Order of the court on June 4, 2015 (Doc. 245).

2. I make this Affidavit in support of the Disclosure Statement for the First Amended Chapter 11 Plan of Reorganization of the Archdiocese of Saint Paul and Minneapolis filed with this court on November 14, 2016. I have personal knowledge of the information contained in this Affidavit.

3. As Special Insurance Coverage Counsel to the Parish Committee, I have represented the more than 100 parishes in the Archdiocese of Saint Paul and Minneapolis ("Parishes") that have been sued in hundreds of lawsuits relating to abuse claims ("Parish Lawsuits"). I have represented the Parishes in locating and confirming their insurance coverage for the Parish Lawsuits, tendering the Parish Lawsuits to their insurers ("Parish Insurers"), and

communicating and negotiating with the Parish Insurers regarding coverage for the Parish Lawsuits.

4. As a result of the 14-month court-ordered insurance mediation process that took place in 2015-2016, the Parishes reached agreements in principle with their insurers to settle their insurance claims relating to the Parish Lawsuits, for an aggregate amount of \$13,732,500 ("Settlement Amount"). The insurance settlements are contingent upon the confirmation of a Chapter 11 Plan of Reorganization acceptable to all the parishes in the Archdiocese of Saint Paul and Minneapolis and the Parish Insurers, and upon the execution of Confidential Settlement Agreements between the Parishes and their Parish Insurers, the terms of which are currently being negotiated and finalized. If an acceptable Chapter 11 Plan is confirmed, the Settlement Amount will be payable by the Parish Insurers to the Archdiocese Trust in accordance with the terms of the Confidential Settlement Agreements, to contribute to the Archdiocese's Chapter 11 Reorganization Plan to increase compensation to the abuse victims and resolve the Parish Lawsuits.

FURTHER YOUR AFFIANT SAITH NOT


Margo S. Brownell

Subscribed and sworn to before me this
14th day of November, 2016.


NOTARY PUBLIC

