

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

In re:

Case No. 11-20059-svk

ARCHDIOCESE OF MILWAUKEE,

Chapter 11

Debtor.

Hon. Susan V. Kelley

**MOTION OF DEBTOR FOR ORDER ESTABLISHING DEADLINES FOR FILING
PROOFS OF CLAIM AND APPROVING FORM AND MANNER OF NOTICE
THEREOF**

The Archdiocese of Milwaukee, debtor and debtor in possession (the "Archdiocese" or the "Debtor"), requests entry of an order, substantially in the form submitted herewith (the "Bar Date Order"), (i) fixing the time within which proofs of claim against the Debtor's estate — including pre-petition claims entitled to administrative priority — are to be filed by entities with general unsecured claims (the "General Bar Date"), victims/survivors of sexual abuse (the "Victims/Survivors Bar Date"), holders of claims resulting from the Debtor's rejection of executory contracts or unexpired leases (the "Rejection Bar Date"), and creditors who may wish to file amended proofs of claim necessitated by the Debtor amending its Schedules of Assets and Liabilities and/or Statement of Financial Affairs (the "Amended Schedule Bar Date"), and together with the General Bar Date, the Victims/Survivors Bar Date, and the Rejection Bar Date, each a "Bar Date" and collectively, the "Bar Dates"); (ii) approving the proposed Proof of Claim Forms (defined below); (iii) approving procedures for maintaining the confidentiality of proofs of claim filed by victims/survivors of sexual abuse (the "Victims/Survivors"); (iv) approving the

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form and manner of the proposed notices of the Bar Dates as providing fair, reasonable and adequate notice of the Bar Dates; and (v) granting related relief (the "Motion"). In support of its Motion, the Debtor respectfully represents as follows:

JURISDICTION

1. The Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334. Venue of this proceeding is proper in this district and before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b)(2).

2. The statutory predicates for the relief requested herein are 11 U.S.C. §§ 502 and 503 and Rules 2002, 3003, 9006, and 9007 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules").

BACKGROUND

3. On January 4, 2011 (the "Petition Date"), the Debtor commenced its reorganization case (the "Reorganization Case") by filing a voluntary petition for relief under chapter 11 of the Bankruptcy Code, 11 U.S.C. §§ 101-1330 (the "Bankruptcy Code").

4. On January 24, 2011, the Office of the United States Trustee (the "U.S. Trustee") appointed an official committee of unsecured creditors in this Reorganization Case comprised exclusively of Victims/Survivors (the "Committee").

5. For a description of the Debtor and its operations, the Debtor respectfully refers the Court and the parties in interest to the *Description of Debtor and Pre-filing History Affidavit of John J. Marek* (the "Marek History Affidavit") [Docket No. 6] which is incorporated herein by reference.

6. On February 7, 2011, the Debtor filed its schedules of assets and liabilities and statement of financial affairs [Docket No. 111] (together, the “Schedules”).

7. On February 11, 2011, the U.S. Trustee held a statutory meeting of creditors in connection with this case (the “341 Meeting”). The 341 Meeting was not noticed to all Victims/Survivors due to confidentiality concerns.

RELIEF REQUESTED

8. In order for the Debtor to fully administer its estate, to solicit acceptances or rejections in connection with a chapter 11 plan, and to make distributions thereunder, the Debtor must obtain complete and accurate information regarding the nature, validity, and amount of all claims¹ that will be asserted in this Reorganization Case. Consequently, the Debtor respectfully requests that, pursuant to Bankruptcy Rule 3003(c)(3), the Court: (i) establish the Bar Dates and related claims procedures proposed herein; (ii) approve the proposed Proof of Claim Forms (defined below); (iii) approve proposed procedures allowing Victims/Survivors to file confidential proofs of claims; (iv) approve the form and manner of the proposed notices of the Bar Dates; and (v) grant related relief.

I. THE BAR DATES

B. The General Bar Date

9. Bankruptcy Rule 3003(c)(3) provides that the Court shall fix a time within which proofs of claim must be filed. The Debtor requests that the Court fix August 1, 2011, as the General Bar Date.

¹ The term “claim,” as used herein, has the meaning given to it in § 101(5) of the Bankruptcy Code.

10. The General Bar Date would be the date by which all entities² including governmental units,³ holding pre-petition claims, including prepetition claims entitled to administrative expense status under § 503(b)(9) of the Bankruptcy Code, but excluding Victims/Survivors Claims (each a “General Claim,” and collectively, the “General Claims”), must file proofs of claim.

C. The Victims/Survivors Bar Date

11. The Debtor requests that the Court fix September 15, 2011, as the Victims/Survivors Bar Date.

12. The Victims/Survivors Bar Date would be the date by which all Claims of Victims/Survivors must be filed. Any Victims/Survivors who filed and had pending as of the Petition Date, a lawsuit against the Debtor must submit a Victim/Survivor Proof of Claim Form (defined below) prior to the Victims/Survivors Bar Date.

D. The Rejection Bar Date

13. It is possible that certain entities may assert claims (each a “Rejection Damages Claim”) in connection with the Debtor’s rejection of executory contracts and/or unexpired leases pursuant to § 365 of the Bankruptcy Code. The Debtor proposes that any person or entity that asserts a Rejection Damages Claim must file a proof of claim on or before the *later of*: (i) the General Bar Date, or (ii) the date that is twenty-eight (28) days after entry of an order approving the rejection of an executory contract or unexpired lease pursuant to which the entity asserting the Rejection Damages Claim is a party. The Rejection Bar Date shall not apply to the claims of Victims/Survivors.

² As used herein, the term “entity” has the meaning given to it in § 101(15) of the Bankruptcy Code.

³ As used herein, the term “governmental unit” has the meaning given to it in § 101(27) of the Bankruptcy Code.

E. Amended Schedule Bar Date

14. The Debtor may, during the course of its case, amend its Schedules of Assets and Liabilities and/or Statements of Financial Affairs (collectively, the “Schedules”) so as to add an entity not currently listed therein or to alter the amount, priority, classification, or other status of a listed claim. The holders of claims affected by the Debtor’s amendments (the “Amended Schedules Claims”) may be entitled to file amended or original proofs of claim to take into account the amendment(s) to the Schedules.

15. The Debtor therefore asks that the Court establish the following as the deadline for filing Amended Schedules Claims: the *later of* (a) the General Bar Date, or (b) twenty-eight (28) days after the holder of a claim is served with notice that the Debtor amended its Schedules to identify, reduce, delete, or change the amount, priority, classification, or other status of such a claim (the “Amended Schedules Bar Date”).

II. WHO MUST FILE PROOFS OF CLAIM

16. The proposed order approving this Motion (the “Bar Date Order,” a copy of which is attached hereto as Exhibit H), provides that, except as set forth in paragraph 17 below, all persons and entities holding prepetition claims, including, without limitation, the following entities, must file the proofs of claim on or before the applicable Bar Date:

- (i) Any person or entity whose prepetition claim against the Debtor is not listed in the Debtor’s Schedules or whose prepetition claim is listed in the Schedules but is listed as disputed, contingent or unliquidated and that desires to participate in this Reorganization Case or share in any distribution in this Reorganization Case;
- (ii) Any person or entity that believes that its prepetition claim is improperly classified in the Schedules or is listed in an incorrect amount and that desires to have its claim allowed in a classification or amount other than that identified in the Schedules; and
- (iii) Any Victim/Survivor who believes that he or she has a claim against the Debtor, including but not limited to Victims/Survivors who have previously filed lawsuits

against the Debtor, and Victims/Survivors who have never filed a lawsuit, entered into a settlement or reported their abuse.

17. Pursuant to the proposed Bar Date Order, the following persons or entities are **not** required to file a proof of claim on or before the applicable Bar Date:

- (i) Any person or entity that has already properly filed a proof of claim against the Debtor with the Debtor or the Clerk of the Court for the United States Bankruptcy Court for the Eastern District of Wisconsin. Victims/Survivors that previously filed with the Court or provided to Debtor's counsel a proof of claim that contains substantially all the information required by the Victim/Survivor Proof of Claim Form, as such term is hereafter defined;
- (ii) Any Victims/Survivors only making a claim for unpaid amounts due or to become due under a settlement agreement reached in the Debtor's voluntary mediation program;⁴
- (iii) Any person or entity: (i) whose claim is listed in the Schedules or any amendments thereto, and (ii) whose claim is not described therein as "disputed," "contingent," or "unliquidated," and (iii) who does not dispute the amount or classification of its claim as set forth in the Schedules;
- (iv) Professionals retained by the Debtor or the Committee pursuant to orders of this Court, including Kurtzman Carson Consultants ("KCC"), who assert administrative claims for payment of fees and expenses subject to the Court's approval pursuant to §§ 330, 331(a) and 503(b) of the Bankruptcy Code;
- (v) Any person or entity that asserts an administrative expense claim against the Debtor pursuant to §§ 503(b)(1) through (8) of the Bankruptcy Code;
- (vi) Any person or entity whose claim against the Debtor has been allowed by an order of the Court entered on or before the applicable Bar Date; and
- (vii) Any person or entity whose claim has been paid in full. For the avoidance of doubt, this does not include Victims/Survivors who were paid pursuant to settlement agreements but believe they have additional claims against the Debtor beyond what was agreed to in the settlement.

III. PROPOSED PROOF OF CLAIM FORMS

18. General Proof of Claim Form. With respect to pre-petition creditors that are not Victims/Survivors – *i.e.*, holders of General Claims, Rejection Damages Claims, or

⁴ As disclosed in Schedule F to the Debtor's Schedules, the Debtor acknowledges that it remains obligated to pay \$702,000 to twenty-two (22) victims/survivors (the "In-Settlement Victims/Survivors") pursuant to their pre-petition Settlement Agreements.

Amended Schedules Claim (collectively, the “The General Creditor Claims”) – the Debtor seeks approval of the proof of claim form attached hereto as Exhibit A (the “General Creditor Proof of Claim Form”), which substantially follows the Official Form 10.⁵

19. The proposed Bar Date Order provides that each General Creditor Proof of Claim Form filed must: (a) be written in English; (b) be denominated in lawful currency of the United States as of the Petition Date; and (c) have attached copies of any writings upon which the claim is based in accordance with Bankruptcy Rules 3001(c) and 3001(d), including for secured claims, evidence that the alleged security interest has been perfected;⁶ and (d) be originally executed and filed with the Court on or before the applicable Bar Date, with a copy provided to the Debtor c/o Whyte Hirschboeck Dudek S.C., Attn: Daryl L. Diesing, 555 East Wells Street, Suite 1900, Milwaukee, WI 53202-3819. The proposed Bar Date Order further provides that proofs of claim must be mailed or delivered by messenger or overnight courier; proofs of claim sent by facsimile, telecopy, or e-mail will not be accepted.

20. *Victim/Survivor Proof of Claim Form.* The Debtor submits that under the circumstances of this case, and especially those relating to the Victims/Survivors, that a modified proof of claim form similar to those utilized by other diocesan debtors should be employed.

⁵ The proposed General Creditor Proof of Claim Form deviates slightly from the Official Form 10 in that it includes a notation indicating that it should not be utilized in connection with the assertion of claims of Victims/Survivors against the Debtor’s estate.

⁶ Bankruptcy Rule 3001(c) requires as follows: “When a claim, or an interest in property of the debtor securing the claim, is based on a writing, the original or a duplicate shall be filed with the proof of claim. If the writing has been lost or destroyed, a statement of the circumstances of the loss or destruction shall be filed with the claim.” Bankruptcy Rule 3001(d) requires that “If a security interest in property of the debtor is claimed, the proof of claim shall be accompanied by evidence that the security interest has been perfected.”

Accordingly, the Debtor, prepared a confidential proof of claim form to be submitted by Victims/Survivors in connection with their claims (the "Victim/Survivor Proof of Claim Form," and together with the General Creditor Proof of Claim Form, the "Proof of Claim Forms"). A copy of the proposed Victim/Survivor Proof of Claim Form is attached hereto as Exhibit B. The information requested in the Victim/Survivor Proof of Claim Form is designed to, and will assist the Debtor in evaluating the claims of Victims/Survivors.

21. Due to the nature of the information that is requested in the Victim/Survivor Proof of Claim Form, the Debtor seeks approval through this Motion of the following confidentiality protocol (the "Confidentiality Protocol"):

- (i) Victims/Survivors are directed not to file a Victim/Survivor Proof of Claim Form with the Court. Instead, the original and two copies of each Victim/Survivor Proof of Claim Form must be sent to the Debtor, c/o Whyte Hirschboeck Dudek S.C., Attn: Daryl L. Diesing, 555 East Wells Street, Suite 1900, Milwaukee, Wisconsin 53202-3819.
- (ii) Victim/Survivor Proof of Claim Forms submitted by Victims/Survivors will not be available to the general public unless a Victim/Survivor affirmatively indicates his or her desire that the proof of claim be made public in Part 1 of the Victim/Survivor Proof of Claim Form. The Confidentiality Protocol is for the benefit of the Victims/Survivors. Accordingly, Victims/Survivors may elect to make any of the information contained in a Victim/Survivor Proof of Claim public even if they elected to file the Proof of Claim confidentially.
- (iii) Victim/Survivor Proof of Claim Forms submitted by a Victim/Survivor shall be held and treated as confidential by the Debtor and Debtor's counsel and upon request to the parties listed below (the "Permitted Parties") subject to each Permitted Party executing and returning to Debtor's counsel the confidentiality agreement attached to the Motion as Exhibit G (the "Confidentiality Agreement"), and to such other persons as the Court determines, provided, however, that all parties with access to the Victim/Survivor Proof of Claim Forms shall agree to keep the information provided in a Victim/Survivor Proof of Claim Form confidential (unless the Victim/Survivor elects otherwise in Part 1 of the Victim/Survivor Proof of Claim Form).⁷
- (iv) The Permitted Parties include:

⁷ Access to the Victim/Survivor Proof of Claim Forms extends only to the natural person who executes the Confidentiality Agreement. A separate Confidentiality Agreement must be signed by each natural person who seeks access to the records on behalf of a Permitted Party.

- (a) The counsel for the Official Committee of Unsecured Creditors;
- (b) Insurance companies that provided insurance that may cover the claims described in the Victim/Survivor Proof of Claim Forms;
- (c) Any future claims representative appointed under a plan of reorganization;
- (d) Any special arbitrator/claims reviewer appointed to review and resolve the claims of Victims/Survivors;
- (e) Any settlement trustee appointed to administer payments to Victims/Survivors;
- (f) Members of the Committee and their personal counsel (after the Victim/Survivor Proof of Claim Form has been redacted to remove the Victim/Survivor's name, address and any other information identified in Part 2(A) of the Victim/Survivor Proof of Claim Form); and
- (g) Such other persons as the Court determines should have the information in order to evaluate Victim/Survivor Claims.

22. In addition to being available in English, the Victim/Survivor Proof of Claim Form will also be available in Spanish and Hmong because of the large Hispanic and Hmong communities in the geographic territory of the Debtor (the "Region").

23. The proposed Bar Date Order provides that each Victim/Survivor Proof of Claim Form filed must: (i) be written in the English, Spanish, or Hmong languages; (ii) be denominated in lawful currency of the United States as of the Petition Date; and (iii) have attached copies of any writings upon which the claim is based in accordance with Bankruptcy Rules 3001(c) and 3001(d);⁸ (iv) be originally executed and sent to the Debtor, c/o Whyte Hirschboeck Dudek S.C., Attn: Daryl L. Diesing, 555 East Wells Street, Suite 1900, Milwaukee, Wisconsin 53202-3819 on or before the applicable Bar Date (NOT FILED WITH THE COURT). The proposed Bar Date Order further provides that proofs of claim must be mailed or

⁸ Bankruptcy Rule 3001(c) requires as follows: "When a claim, or an interest in property of the debtor securing the claim, is based on a writing, the original or a duplicate shall be filed with the proof of claim. If the writing has been lost or destroyed, a statement of the circumstances of the loss or destruction shall be filed with the claim." Bankruptcy Rule 3001(d) requires that "If a security interest in property of the debtor is claimed, the proof of claim shall be accompanied by evidence that the security interest has been perfected."

delivered by messenger or overnight courier; proofs of claim sent by facsimile, telecopy, or e-mail will not be accepted.

24. Pursuant to this Motion, the Debtor seeks authority to retain and compensate any translation services that might be needed to translate the Victim/Survivor Proof of Claim Forms into Spanish and Hmong from English and to translate any completed Victim/Survivor Proof of Claim Forms into English from Spanish or Hmong.

25. The Debtor asks that, pursuant to Fed. R. Bankr. P. 3003(c)(2), any holder of a claim whether a General Creditor Claim, Victim/Survivor Claim, Rejection Damages Claim, or Amended Schedules Claim that is not subject to one of the exceptions enumerated above who fails to timely file a proof of claim in the appropriate form be forever barred from (a) asserting such claim against the Debtor or its estate; (b) voting on any plan of reorganization filed in the Reorganization Case, and (c) participating in any distribution in the Reorganization Case on account of such claim, and that the Debtor need not provide further notices regarding such claim.

IV. Notice Procedures

A. Notice of the General and Rejection Damages Bar Dates

26. Within five (5) days of the entry of the Bar Date Order, the Debtor proposes to serve by United States mail, first-class postage prepaid: (i) notice of the General Bar Date and the Rejection Damages Bar Date, substantially in the form attached hereto as Exhibit C and incorporated herein by reference (the “General Creditor Bar Date Notice”); (ii) a General Creditor Proof of Claim Form substantially in the form attached hereto as Exhibit A; and (iii) the Bar Date Order (together with the General Creditor Bar Date Notice and the General Creditor Proof of Claim Form, the “General Creditor Bar Date Notice Package”), upon: (a) all entities who have filed a notice of appearance in the Debtor's case; (b) all entities listed in the Debtor's Schedules; (c) all entities that have previously filed proofs of claim in the Debtor's case; (d) any

other entities or their counsel, including governmental units, known to Debtor as entities who may have claims against the estate; and (e) all parties or their counsel listed on the Service List as maintained pursuant to this Court's Case Management Order.

27. The General Creditor Bar Dates give potential claimants a significantly greater notice period than required by Bankruptcy Rules 2002(a)(7) and 3002(c)(1).⁹

B. Notice of the Victims/Survivors Bar Date

28. The Debtor proposes a notice protocol which capitalizes on the success of the Mediation Program, and incorporates some of the input received from the Committee and other dioceses around the country.

29. The Archdiocese, recognizing the need for a process outside the archdiocesan structure to address claims against the Archdiocese by Victims/Survivors, introduced a voluntary Mediation Program in January 2004 (the "Mediation Program"). The Mediation Program was designed by Professor Eva M. Soeka, Director of Marquette University's Center for Dispute Resolution and not by the Archdiocese.

30. The Mediation Program was designed to offer dignity, flexibility, and control to Victims/Survivors. Victims/Survivors participate voluntarily in the Mediation Program and there is no obligation on the part of any Victim/Survivor to agree to a mediated settlement after participating in the Mediation Program.

31. The Archdiocese announced the establishment of the Mediation Program with an unprecedented and extensive public awareness campaign. The Archdiocese utilized both Church-related and non-Church related media venues, print media outlets, brochures and posters to reach potential users of the Mediation Program. Following the public announcement on

⁹ Bankruptcy Rule 2002(a)(7) states that "the clerk, or some other person as the court may direct, shall give the debtor, the trustee, all creditors and indenture trustees at least 21 days' notice by mail of . . . the time fixed for filing proofs of claim pursuant to [Bankruptcy] Rule 3003(c)"

January 29, 2004, the Archdiocese purchased print advertisements in the Milwaukee Journal Sentinel (which had a circulation of 434,668 at the time), all Hometown Publications in the Archdiocese (423,500 circulation), and numerous other discrete media outlets (Beaver Dam Daily Citizen (12,800 circulation), Catholic Herald (26,000 circulation), CNI (all newspapers) (64,937 circulation), Fond du Lac Reporter (20,000 circulation) Kenosha News (30,000 circulation), Racine Journal Times (31,275 circulation), Sheboygan Press (28,000 circulation), Shepherd Express (65,000 circulation), Waukesha Freeman (24,000 circulation), and the West Bend Daily News (11,000 circulation) In addition, the Archdiocese sent a media release to over one hundred (100) outlets in the 10-county geographic area of the Archdiocese, and distributed flyers to all parishes (then 219), elementary schools (then 132), secondary schools (then 13), campus ministry contacts (11), and programs that provide free services to sexual abuse victims/survivors (22). Similarly, the information was distributed to the Archdiocese's own employees, as well as parish staff members and school staff members throughout the Archdiocese (a total of 3,888 individuals). Finally, the Archdiocese created a robust website post to publicize the Mediation Program (at the time, the Archdiocese website post was averaging 58,862 "hits" a day).

32. Based on the success of the Mediation Program, the Debtor proposes to make the following available to the public: (i) a notice of the Victims/Survivors Bar Date substantially in the form attached hereto as Exhibit D and incorporated herein by reference (the "Victims/Survivors Bar Date Notice," and together with the General Creditor Bar Date Notice, each a "Bar Date Notice" and collectively, the "Bar Date Notices"); (ii) a Victim/Survivor Proof of Claim Form, substantially in the form attached hereto as Exhibit B; (iii) a list of diocesan priests against whom the Debtor has received substantiated reports of sexual abuse of a minor (the "Abusers") in substantially the form attached hereto as Exhibit E; and (iv) the Bar Date

Order (together with the Victims/Survivors Bar Date Notice and the Victim/Survivor Proof of Claim Form, the "Victim/Survivor Bar Date Notice Package," and together with the General Creditor Bar Date Package, the "Bar Date Packages").

33. The Debtor shall provide notice of the Victims/Survivors Bar Date by serving the Victim/Survivor Notice Package on Settled Victims/Survivors, In-Settlement Victims/Survivors, Represented Claimants, and Unrepresented Claimants (as such terms are defined in the Debtor's Motion for Special Confidentiality Procedures to Protect Victims/Survivors [Docket No. 165]) in the fashion approved by any Special Confidentiality Procedures Order approved by this Court.

34. The Debtor will also serve the Victim/Survivor Notice Package on all individuals currently known to the Chancellor of the Archdiocese or the Archdiocese's Victim Assistance Coordinator as having:

- (i) filed or threatened to file lawsuits against the Archdiocese that allege they were abused;
- (ii) contacted the Archdiocese to report that they were victims of abuse, whether or not that individual's claim was considered to be substantiated and whether or not the report was written or verbal;
- (iii) received payment from the Debtor as a result of an allegation of abuse;
- (iv) participated in the Mediation Program but not entered into a settlement agreement; and
- (v) been provided counseling, spiritual direction, or therapy support related to abuse or been referred for same by the Debtor.

35. The Debtor will serve the individuals included in the preceding paragraph (the "Potential Claimants") using the same confidentiality procedures as those approved by the Court for Unrepresented Claimants, unless such individuals have counsel known to the Debtor, in which case service will be effectuated through such counsel, in the same fashion as approved by the Court for service on the Represented Claimants.

36. The Victims/Survivors Bar Date gives Victims/Survivors a significantly greater notice period than required by Bankruptcy Rule 2002(a)(7).

C. Publication Notices

37. In consultation with the Committee, the Debtor determined, pursuant to Bankruptcy Rule 2002(l), that it would be in the best interest of its estate to give notice by publication to certain creditors including: (i) unknown Victims/Survivors; (ii) those creditors to whom no other notice was sent and who are unknown or not reasonably ascertainable by the Debtor; (iii) known creditors with addresses unknown by the Debtor; and (iv) creditors with potential claims unknown by the Debtor.

38. Accordingly, the Debtor intends to provide notice of the Bar Dates by causing a copy of the notice attached hereto as Exhibit F (the "Publication Notice") to be published as follows:

(i) Publication twice (in English) in each of the following publications:

Appleton Post-Crescent
Beaver Dam Daily Citizen
Catholic Herald
Chicago Tribune
Eau Claire Leader Telegram
Fond du Lac Reporter
Green Bay Press Gazette
Hometown Publications (all newspapers)
Janesville Messenger
Kenosha News
La Crosse Tribune
Los Angeles Times
My Community Now (all newspapers)
Milwaukee Journal Sentinel
Racine Journal Times
Sheboygan Press
Shepherd Express
Waukesha Freeman
Wausau Daily Herald
West Bend Daily News
Wisconsin State Journal

- (ii) Publication twice (in Spanish) in each of the following publications:
- Milwaukee Journal Sentinel
Spanish Journal
- (iii) Publication twice (in Hmong) in the following publication:
- HmongHello!
- (iv) In addition, the Debtor intends to provide further notice of the Bar Dates by taking the following measures:
- (a) The Debtor will provide an 8.5" by 11" copy of the Publication Notice to all Catholic parishes and all Catholic daycares, preschools, kindergartens, elementary, middle, and high schools and orphanages in the Region (the "Schools") and request that each parish or School post the Publication Notice in a prominent location for at least six weeks;
- (b) Archbishop Jerome ListECKI will prepare a letter notifying Catholics in the Region of the Bar Dates and will request that each parish in the Region include said letter at least once in its parish bulletin.
- (c) The Debtor will post the Publication Notice on the following websites:
- www.archmil.org
www.kccllc.net/archmil;
- (d) The Debtor will maintain a toll free number answered by the Archdiocese's Victim Assistance Coordinator which may be by Victims/Survivors to ask questions or obtain copies of Victim/Survivor Proof of Claim Form;
- (e) The Debtor will request Schools in the Region provide the Debtor with current alumni mailing lists, if any, and will send the Publication Notice and the list of Abusers in substantially the form attached hereto as Exhibit E to any individual that appears on lists provided by a School;
- (f) The Debtor will request that the agencies listed on the Debtor's website at <http://www.archmil.org/offices/sexual-abuse-prevention/community-agencies.htm> that offer free services to victims of sexual abuse in the Region post the Publication Notice in a prominent location;
- (g) The Debtor will issue a press release announcing the Bar Date;
- (h) The Debtors will mail a copy of the Victim/Survivor Bar Date Notice to each of the following individuals or entities within the Region: all police departments, the office of the District Attorney, the office of the attorney

general, all licensed therapists known by the Archdiocese who work with survivors of sexual abuse, the regional headquarters of Alcoholics Anonymous and Narcotics Anonymous, all drug treatment centers, hospitals and public libraries; and

- (i) The Debtor will file a certificate of notice by publication attesting to the efforts it made to comply with these procedures with the Court and file it in the Reorganization Case by September 23, 2011.

39. In the Debtor's judgment, the publication protocol described above (the "Publication Protocol") is likely to reach the widest possible audience of creditors who may not otherwise have notice of this Reorganization Case.

40. Additionally, the Bar Date Notices and the Publication Notice will: (i) set forth the Bar Dates; (ii) advise creditors under what circumstances they must file a proof of claim in respect of a pre-petition claim under Bankruptcy Rules 3002(c)(2) and 3003(c)(3) or an order of this Court, as applicable; (iii) alert creditors to the consequences of failing to timely file a proof of claim, as set forth in Bankruptcy Rule 3003(c)(2) or an order of this Court, as applicable; (iv) set forth the address to which proofs of claim must be sent for filing; (v) outline the Confidentiality Protocol; and (vi) notify creditors that: (a) proofs of claim must be filed with original signatures, and (b) facsimile or e-mail filings of proofs of claim are not acceptable and are not valid for any purpose. The Debtor submits that the Publication Protocol is appropriate and that the Bar Date Notices and Publication Notice will provide creditors with sufficient information to file properly prepared and executed proofs of claim in a timely manner, while simultaneously protecting the confidentiality of Victims/Survivors.

BASES FOR RELIEF REQUESTED

41. Bankruptcy Rule 3003(c)(3) provides that the Court shall fix the time within which proofs of claim must be filed in a chapter 11 case pursuant to section 501 of the Bankruptcy Code. Fed. R. Bankr. P. 3003(c)(3).

42. Under Bankruptcy Rule 3002(c)(1), a "governmental unit" has up to 180 days after the Petition Date to timely file a proof of claim. Bankruptcy Rule 3003(c)(2) further provides that any creditor who asserts a claim against the debtor that arose prior to the petition date, and whose claim is not scheduled in the debtor's schedules of assets and liabilities or whose claim is listed on such schedules as disputed, contingent, or unliquidated, must file a proof of claim, failing which such creditor shall not be treated as a creditor with respect to such claim for the purposes of voting and distribution. Bankruptcy Rule 3003(c)(2).

43. The Debtor submits that the proposed Bar Dates will provide potential claimants with an adequate amount of time after the mailing of the Bar Date Packages and publication of the Publication Notice within which to review the Schedules, compare the information contained therein with their own books and records and, if necessary, prepare and file proofs of claim. This includes governmental units that will receive more than the 180 days after the Petition Date required by Bankruptcy Rule 3002(c)(1) to file a proof of claim.

44. The establishment of the proposed Bar Dates is essential for this Reorganization Case to progress; the Debtor cannot effectively negotiate and prepare a plan of reorganization until the extent of the claims against it have been fixed.

45. In addition, the Debtor submits that the special proposed Victim/Survivor Proof of Claim form is appropriate under the circumstances of this case. It is well established that the Court has the authority to authorize the modification of Official Bankruptcy Form B10. *See In re A.H. Robins Co.*, 862 F.2d 1092 (4th Cir. 1988); *In re Eagle-Picher Indus., Inc.*, 158 B.R. 713, 716 (Bankr. S.D. Ohio 1993). While Bankruptcy Rule 3001(a) provides that "[a] proof of claim shall conform substantially to the appropriate Official Form," Bankruptcy Rule 9009 authorizes appropriate and necessary alterations to the Official Forms:

[T]he Official Forms prescribed by the Judicial Conference of the

United States shall be observed and used *with alterations as may be appropriate. Forms may be combined and their contents rearranged to permit economies in their use.* The Director of the Administrative Office of the United States Courts may issue additional forms under the Code. The forms shall be construed to be consistent with these rules and the Code.

Fed. R. Bankr. P. 9009 (emphasis supplied); *see also In re I.G. Servs., Ltd.*, 244 B.R. 377, 384 (Bankr. W.D. Tex. 2000)(citing *In re A.H. Robins Co.*, 862 F.2d 1092) (noting that proof of claim forms that deviate from the Official Proof of Claim Form 10 may be used when special circumstances exist). Further, in *A.H. Robins Co.*, the court recognized that substantial alteration to Official Proof of Claim Form 10 may be necessary when dealing with tort claims. *See In re A.H. Robins Co.*, 862 F.2d at 1095-96.

46. Additionally, similar forms have been approved in other diocesan cases in connection with the assertion of claims arising out of sexual abuse. *See, e.g., In re Catholic Diocese of Wilmington, Inc.*, Case No. 09-13560 (Bankr. D. Del. Feb. 1, 2010); *In re Roman Catholic Church of The Diocese of Tucson*, Case No. 04-04721 (Bankr. D. Ariz. Nov. 5, 2004); *In re Catholic Bishop of N. Alaska*, Case No. 08-00110 (Bankr D. Ala. May 30, 2008); *In re The Diocese of Davenport*, Case No. 06-02229 (Bankr. S.D. Iowa Mar. 16, 2007); *In re the Roman Catholic Bishop of San Diego*, Case No. 07-00939 (Bankr. S.D. Cal. Aug. 20, 2007).

47. The Debtor respectfully requests that the use of the Victim/Survivor Proof of Claim Form is necessary and appropriate in this case. The form requires information necessary to allow the Debtor and the Committee to evaluate the claims of Victims/Survivors.

48. In addition, the Debtor submits that the Confidentiality Protocol is both necessary and appropriate under the circumstances of this case. The Debtor is sensitive to the issues that may arise for a Victim/Survivor asserting a claim against the Debtor's estate. Through the Confidentiality Protocol and the Victim/Survivor Proof of Claim Form, the Debtor

is attempting to obtain the information that it needs in order to evaluate the Victims'/Survivors' claims, while at the same time providing a form that will not discourage Victims/Survivors from coming forward and asserting their claims.

49. The Debtor also submits that the Bar Date Notices and Publication Notice in the forms and manners as proposed by the Debtor herein, are fair and reasonable and will provide good, sufficient, and due notice to all creditors, including creditors with foreign addresses, of their rights and obligations in connection with claims they may assert against the Debtor's estate in this Reorganization Case.

RESERVATION OF RIGHTS

50. The Debtor reserves its right to object to any claim or proof of claim on any grounds, including, but not limited to, the passing of the applicable statutes of limitations. The Debtor reserve its right to dispute, or to assert offsets or defenses to, any claim reflected on the Schedules, or any amendments thereto, as to amount, liability, classification, or otherwise, and to subsequently designate any claim as disputed, contingent, unliquidated or undetermined.

NOTICE

51. The Debtor will serve notice of this Motion on the Service List. In light of the nature of the relief requested herein, the Debtor submits that no other or further notice is necessary.

52. No previous request for the relief sought herein has been made to this or any other Court.

CONCLUSION

WHEREFORE, the Debtor respectfully requests that the Court enter an order, substantially in the form attached hereto as Exhibit H: (i) authorizing the Debtor to fix the Bar

Dates; (ii) approving the proposed Proof of Claim Forms; (iii) approving the form and manner of notice of the Bar Date Notice Packages, pursuant to Bankruptcy Rule 2002(a)(7); (iv) approving the form and manner of publication of the Publication Notice pursuant to Bankruptcy Rule 2002(l); and (v) granting such other and further relief as the Court may deem proper.

Dated: May 6, 2011

ARCHDIOCESE OF MILWAUKEE
Debtor and Debtor-in-Possession
by its counsel,
Whyte Hirschboeck Dudek S.C.

By: /s/ Daryl L. Diesing

Daryl L. Diesing
State Bar No. 1005793
Bruce G. Arnold
State Bar No. 1002833
Michael E. Gosman
State Bar No. 1078872

POST OFFICE ADDRESS:
555 East Wells Street, Suite 1900
Milwaukee, WI 53202
Telephone: (414) 273-2100
Facsimile: (414) 223-5000
Email: ddiesing@whdlaw.com
barnold@whdlaw.com
mgosman@whdlaw.com

EXHIBIT A

General Creditor Proof of Claim Form

WHD/7838268.1

UNITED STATES BANKRUPTCY COURT		PROOF OF CLAIM
Name of Debtor: Archdiocese of Milwaukee		Case Number: 11-20059-svk
NOTE: This form should not be used to make a claim for an administrative expense arising after the commencement of the case. A request for payment of an administrative expense may be filed pursuant to 11 U.S.C. §503. This form should also not be used in connection with claims by Victims/Survivors.		
Name of Creditor (The person or other entity to whom the debtor owes money or property):		<input type="checkbox"/> Check this box to indicate that this claim amends a previously filed claim.
Name and address where notices should be sent: Telephone number:		Court Claim Number: _____ (if known) Filed on: _____
Name and address where payment should be sent (if different from above): Telephone number:		<input type="checkbox"/> Check box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars. <input type="checkbox"/> Check this box if you are the debtor or trustee in this case.
1. Amount of Claim as of Date Case Filed: \$ _____ If all or part of your claim is secured, complete item 4 below; however, if all of your claim is unsecured, do not complete item 4. If all or part of your claim is entitled to priority, complete item 5. <input type="checkbox"/> Check this box if claim includes interest or other charges in addition to the principal amount of claim. Attach itemized statement of interest charges.		5. Amount of Claim Entitled to Priority under 11 U.S.C. §507(a). If any portion of your claim falls in one of the following categories, check the box and state the amount. Specify the priority of the claim.
2. Basis for Claim: _____ (See instruction #2 on reverse side.)		<input type="checkbox"/> Domestic support obligations under 11 U.S.C. §507(a)(1)(A) or (a)(1)(B).
3. Last four digits of any number by which creditor identifies debtor: _____ 3a. Debtor may have scheduled account as: _____ (See instruction #3a on reverse side.)		<input type="checkbox"/> Wages, salaries, or commissions (up to \$11,725 *) earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier – 11 U.S.C. § 507(a)(4).
4. Secured Claim (see instruction #4 on reverse side). Check the appropriate box if your claim is secured by a lien on property or a right of setoff and provide the requested information. Nature of property or right of setoff: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other _____ Describe: Value of Property: \$ _____ Annual Interest Rate: _____ % Amount of arrearage and other charges as of time case filed included in secured claim, if any: \$ _____ Basis for perfection: _____ Amount of Secured Claim: \$ _____ Amount Unsecured: \$ _____		<input type="checkbox"/> Contributions to an employee benefit plan – 11 U.S.C. §507(a)(5). <input type="checkbox"/> Up to \$2,600* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use – 11 U.S.C. §507(a)(7). <input type="checkbox"/> Taxes or penalties owed to governmental units – 11 U.S.C. §507(a)(8).
6. Credits: The amount of all payments on this claim has been credited for the purpose of making this proof of claim.		<input type="checkbox"/> Other – Specify applicable paragraph of 11 U.S.C. §507(a) (____)
7. Documents: Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages and security agreements. You may also attach a summary. Attach redacted copies of documents providing evidence of perfection of a security interest. You may also attach a summary. (See instruction 7 and definition of "redacted" on reverse side). DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING. If the documents are not available, please explain:		Amount entitled to priority: \$ _____ <small>*Amounts are subject to adjustment on 4/1/13 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.</small>
Date:	Signature: The person filing this claim must sign it. Sign and print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any.	FOR COURT USE ONLY

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.

INSTRUCTIONS FOR PROOF OF CLAIM FORM

The instructions and definitions below are general explanations of the law. In certain circumstances, such as bankruptcy cases not filed voluntarily by the debtor, there may be exceptions to these general rules.

Items to be completed in Proof of Claim form

Court, Name of Debtor and Case Number:

Fill in the federal judicial district where the bankruptcy case was filed (for example, Central District of California), the bankruptcy debtor's name, and the bankruptcy case number. If the creditor received a notice of the case from the bankruptcy court, all of this information is located at the top of the notice.

Creditor's Name and Address:

Fill in the name of the person or entity asserting a claim and the name and address of the person who should receive notices issued during the bankruptcy case. A separate space is provided for the payment address if it differs from the notice address. The creditor has a continuing obligation to keep the court informed of its current address. See Federal Rule of Bankruptcy Procedure (FRBP) 2002(g).

1. Amount of Claim as of Date Case Filed:

State the total amount owed to the creditor on the date of the Bankruptcy filing. Follow the instructions concerning whether to complete items 4 and 5. Check the box if interest or other charges are included in the claim.

2. Basis for Claim:

State the type of debt or how it was incurred. Examples include goods sold, money loaned, services performed, personal injury/wrongful death, car loan, mortgage note, and credit card. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information. You may be required to provide additional disclosure if the trustee or another party in interest files an objection to your claim.

3. Last Four Digits of Any Number by Which Creditor Identifies Debtor:

State only the last four digits of the debtor's account or other number used by the creditor to identify the debtor.

3a. Debtor May Have Scheduled Account As:

Use this space to report a change in the creditor's name, a transferred claim, or any other information that clarifies a difference between this proof of claim and the claim as scheduled by the debtor.

4. Secured Claim:

Check the appropriate box and provide the requested information if the claim is fully or partially secured. Skip this section if the claim is entirely unsecured. (See DEFINITIONS, below.) State the type and the value of property that secures the claim, attach copies of lien documentation, and state annual interest rate and the amount past due on the claim as of the date of the bankruptcy filing.

5. Amount of Claim Entitled to Priority Under 11 U.S.C. §507(a).

If any portion of your claim falls in one or more of the listed categories, check the appropriate box(es) and state the amount entitled to priority. (See DEFINITIONS, below.) A claim may be partly priority and partly non-priority. For example, in some of the categories, the law limits the amount entitled to priority.

6. Credits:

An authorized signature on this proof of claim serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

7. Documents:

Attach to this proof of claim form redacted copies documenting the existence of the debt and of any lien securing the debt. You may also attach a summary. You must also attach copies of documents that evidence perfection of any security interest. You may also attach a summary. FRBP 3001(c) and (d). If the claim is based on the delivery of health care goods or services, see instruction 2. Do not send original documents, as attachments may be destroyed after scanning.

Date and Signature:

The person filing this proof of claim must sign and date it. FRBP 9011. If the claim is filed electronically, FRBP 5005(a)(2), authorizes courts to establish local rules specifying what constitutes a signature. Print the name and title, if any, of the creditor or other person authorized to file this claim. State the filer's address and telephone number if it differs from the address given on the top of the form for purposes of receiving notices. Attach a complete copy of any power of attorney. Criminal penalties apply for making a false statement on a proof of claim.

DEFINITIONS

Debtor

A debtor is the person, corporation, or other entity that has filed a bankruptcy case.

Creditor

A creditor is a person, corporation, or other entity owed a debt by the debtor that arose on or before the date of the bankruptcy filing. See 11 U.S.C. §101 (10)

Claim

A claim is the creditor's right to receive payment on a debt owed by the debtor that arose on the date of the bankruptcy filing. See 11 U.S.C. §101 (5). A claim may be secured or unsecured.

Proof of Claim

A proof of claim is a form used by the creditor to indicate the amount of the debt owed by the debtor on the date of the bankruptcy filing. The creditor must file the form with the clerk of the same bankruptcy court in which the bankruptcy case was filed.

Secured Claim Under 11 U.S.C. §506(a)

A secured claim is one backed by a lien on property of the debtor. The claim is secured so long as the creditor has the right to be paid from the property prior to other creditors. The amount of the secured claim cannot exceed the value of the property. Any amount owed to the creditor in excess of the value of the property is an unsecured claim. Examples of liens on property include a mortgage on real estate or a security interest in a car.

A lien may be voluntarily granted by a debtor or may be obtained through a court proceeding. In some states, a court judgment is a lien. A claim also may be secured if the creditor owes the debtor money (has a right to setoff).

Unsecured Claim

An unsecured claim is one that does not meet the requirements of a secured claim. A claim may be partly unsecured if the amount of the claim exceeds the value of the property on which the creditor has a lien.

Claim Entitled to Priority Under 11 U.S.C. §507(a)

Priority claims are certain categories of unsecured claims that are paid from the available money or property in a bankruptcy case before other unsecured claims.

Redacted

A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. A creditor should redact and use only the last four digits of any social-security, individual's tax-identification, or financial-account number, all but the initials of a minor's name and only the year of any person's date of birth.

Evidence of Perfection

Evidence of perfection may include a mortgage, lien, certificate of title, financing statement, or other document showing that the lien has been filed or recorded.

INFORMATION

Acknowledgement of Filing of Claim

To receive acknowledgment of your filing, you may either enclose a stamped self-addressed envelope and a copy of this proof of claim or you may access the court's PACER system (www.pacer.psc.uscourts.gov) for a small fee to view your filed proof of claim.

Offers to Purchase a Claim

Certain entities are in the business of purchasing claims for an amount less than the face value of the claims. One or more of these entities may contact the creditor and offer to purchase the claim. Some of the written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court or the debtor. The creditor has no obligation to sell its claim. However, if the creditor decides to sell its claim, any transfer of such claim is subject to FRBP 3001(e), any applicable provision of the Bankruptcy Code (11 U.S.C. § 101 et seq.), and any applicable orders of the bankruptcy court.

EXHIBIT B

Victim/Survivor Proof of Claim Form

WHD/7838279.1

THIS SPACE IS FOR COURT USE ONLY

[Both English and Spanish Versions Will Be Provided]

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

In re:

ARCHDIOCESE OF MILWAUKEE,

Debtor.

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)
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)

Case No. 11-20059-svk

Chapter 11

**VICTIM/SURVIVOR PROOF OF
CLAIM**

IMPORTANT:
THIS FORM MUST BE RECEIVED NO LATER THAN
SEPTEMBER 15, 2011 AT 4:00 P.M.

Carefully read the instructions included with this VICTIM/SURVIVOR PROOF OF CLAIM FORM and complete ALL applicable questions. Please print clearly and use blue or black ink. Send the *original together with two copies* to: Debtor's Counsel, Whyte Hirschboeck Dudek S.C., attention Daryl L. Diesing, 555 East Wisconsin Avenue, Suite 1900, Milwaukee, Wisconsin 53202-3819.

YOU MAY WISH TO CONSULT AN ATTORNEY REGARDING THIS MATTER, AND YOU MAY ALSO OBTAIN INFORMATION FROM THE ARCHDIOCESE'S VICTIM ASSISTANCE COORDINATOR AT 800-XXX-XXXX.

TO BE VALID, THIS PROOF OF CLAIM MUST BE SIGNED BY THE VICTIM/SURVIVOR OR MUST BE SIGNED BY THE VICTIM/SURVIVOR'S ATTORNEY. IF THE VICTIM/SURVIVOR IS DECEASED OR INCAPACITATED, THE FORM MAY BE SIGNED BY THE VICTIM/SURVIVOR'S REPRESENTATIVE OR THE ATTORNEY FOR THE ESTATE. IF THE VICTIM/SURVIVOR IS A MINOR, THE FORM MAY BE SIGNED BY THE VICTIM/SURVIVOR'S PARENT OR LEGAL GUARDIAN OR THE VICTIM/SURVIVOR'S ATTORNEY.

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§152 and 3571

UNLESS YOU INDICATE OTHERWISE IN PART 1 BELOW, YOUR IDENTITY WILL BE KEPT STRICTLY CONFIDENTIAL, UNDER SEAL AND OUTSIDE THE PUBLIC RECORD BY THE UNITED STATES BANKRUPTCY COURT. HOWEVER, INFORMATION IN THIS CLAIM WILL BE PROVIDED PURSUANT TO COURT-APPROVED GUIDELINES TO COUNSEL FOR COMMITTEE OF UNSECURED CREDITORS AND TO SUCH OTHER PERSONS AS THE COURT DETERMINES NEED THE INFORMATION IN ORDER TO EVALUATE THE CLAIM

PART 1. CONFIDENTIALITY

THIS VICTIM/SURVIVOR PROOF OF CLAIM FORM (ALONG WITH ANY ACCOMPANYING EXHIBITS AND ATTACHMENTS) WILL BE MAINTAINED AS CONFIDENTIAL UNLESS YOU EXPRESSLY REQUEST THAT IT BE PUBLICLY AVAILABLE BY CHECKING THE BOX AND SIGNING BELOW.

I do not want this Proof of Claim Form (along with any accompanying exhibits and attachments) to be kept confidential. Please verify this election by signing directly below.

Signature: _____

Print Name: _____

PART 2: IDENTIFYING INFORMATION

A. Victim/Survivor

First Name Middle Initial Last Name Jr/Sr/III

Mailing Address: (If party is incapacitated, is a minor or is deceased, please provide the address of the individual submitting the claim).

City State/Prov. Zip Code (Postal Code) Country (if other than U.S.A.)

Telephone No.
Home: _____ Work: _____ Cell: _____

Email address _____

May we leave voicemails for you regarding your claim? yes no

May we send confidential information to your email: yes no

Birth Date Male Female
 Month Day Year

Any other name or names by which Victim/Survivor has been known: _____

B. Victim/Survivor's Attorney (if any):

Law Firm Name

Attorney's First Name Middle Initial Last Name

Street Address

City State/Prov. Zip Code (Postal Code) Country (if other than U.S.A.)

Telephone No. Fax No. E-mail address

PART 3: NATURE OF COMPLAINT
(Attach additional separate sheets if necessary)

NOTE: IF YOU HAVE PREVIOUSLY FILED A LAWSUIT AGAINST THE DEBTOR IN STATE OR FEDERAL COURT, YOU MAY ATTACH THE COMPLAINT. IF YOU DID NOT FILE A LAWSUIT OR IF THE COMPLAINT DOES NOT CONTAIN ALL OF THE INFORMATION REQUESTED BELOW, YOU MUST PROVIDE THE INFORMATION BELOW.

a. Who committed the acts of abuse or other wrongful conduct?

b. What is the Position, Title or Relationship to You (if known) (e.g., Priest, Teacher, Coach, etc.) of the abuser or individual who committed these acts?

c. Where did the abuse or other wrongful conduct take place? Please be specific and complete all relevant information that you know, including the City and State, name of the Parish or School (if applicable) and/or the name of any other location.

d. When did the abuse or other wrongful conduct take place?

1. If the abuse or other tortious conduct took place over a period of time (months or years) please state when it started, when it stopped, and how many times it occurred.

2. Please also state your age(s) and your grade(s) in school (if applicable) at the time the abuse or other wrongful conduct took place.

e. What happened (describe what happened):

f. Did you tell anyone about the abuse or other tortious conduct and, if so, who did you tell and when (this would include parents; relatives; friends; the Archdiocese; your parish; attorneys; counselors; and law enforcement authorities)?

PART 4: IMPACT OF COMPLAINT

(Attach additional separate sheets if necessary)

(If you are uncertain how to respond to this Part 4, you may leave this Part 4 blank, but you will be required to complete this Part 4 within thirty (30) days after a written request is made for the information requested in this Part 4)

1. What injuries have occurred to you because of the act or acts of abuse or other wrongful conduct that resulted in the claim (for example, the effect on your education, employment, personal relationships, health, and any physical injuries)?

2. Have you sought counseling or other treatment for your injuries? If so, _____
with whom and when? _____
3. Amount of Claim as of January 4, 2011: \$_____

PART 5. ADDITIONAL INFORMATION

1. Settlements: Regardless of whether a complaint was ever filed against any party because of the abuse or other wrongful conduct, have you settled any claim relating to the abuse or other wrongful conduct described in this claim?

Yes No If "Yes", please describe including parties to the settlement, and attach a copy of any settlement agreement.

2. Bankruptcy. Have you ever filed bankruptcy? Yes No If "Yes", please provide the following information:

Name of Case: _____ Court: _____

Date filed: _____ Case No. _____

Chapter: 7 11 12 13 Name of Trustee: _____

Date: _____

Sign and print the name and title, if any, of the Victim/Survivor or other person authorized to file this claim.

Under penalty of perjury, I declare the foregoing statements to be true and correct.

Signature: _____

Print Name: _____

EXHIBIT C

Notice of Bar Dates for Filing of General Creditors' Proofs of Claim

WHD/7838438.1

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

In re:

Case No. 11-20059-svk

ARCHDIOCESE OF MILWAUKEE,

Chapter 11

Debtor.

Hon. Susan V. Kelley

NOTICE OF BAR DATES FOR FILING OF GENERAL CREDITORS

TO ALL PERSONS AND ENTITIES WITH CLAIMS AGAINST THE ARCHDIOCESE OF MILWAUKEE:

PLEASE TAKE NOTICE that on January 4, 2011 (the "Petition Date") the debtor and debtor in possession in the above-captioned case (the "Debtor") filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). The Debtor, its address, case number, proof of claim forms and other relevant information related to this chapter 11 case may be obtained at: www.kccllc.net/ArchMil.

PLEASE TAKE FURTHER NOTICE that on [_____], 2011, the United States Bankruptcy Court for the Eastern District of Wisconsin (the "Court") entered an order (the "Bar Date Order") establishing certain claims bar dates in the Debtor's chapter 11 case. By the Bar Date Order, the Court established **August 1, 2011** as the date by which general creditor claims must be filed (the "General Creditor Bar Date"). Except as described below, the Bar Date Order requires all Entities, including Governmental Units that have or assert any prepetition Claims against the Debtor to file proofs of claim with the Court so that their proofs of claim are received by August 1, 2011. Please note that the terms "Entity," "Governmental Unit" and "Claim" are defined below.

PLEASE TAKE FURTHER NOTICE that for your convenience, enclosed with this notice (the "Bar Date Notice") is a proof of claim form (the "Proof of Claim Form"), which identifies on its face the amount, nature and classification of your Claim(s), if any, listed in the Debtor's schedules of assets and liabilities and statements of financial affairs filed in this case (collectively, the "Schedules"). If this notice does not include a proof of claim form, a proof of claim form may be obtained from the Noticing Agent at www.kccllc.net/archmil.

Daryl L. Diesing
Bruce G. Arnold
Michael E. Gosman
WHYTE HIRSCHBOECK DUDEK S.C.
555 East Wells Street, Suite 1900
Milwaukee, Wisconsin 53202-4894
Telephone: (414) 273-2100
Facsimile: (414) 223-5000
Email: ddiesing@whdlaw.com
WHD/7838438.1

KEY DEFINITIONS

- As used in this Notice, the term “Entity” has the meaning given to it in section 101(15) of the Bankruptcy Code, and includes all persons (individuals, partnerships and corporations), estates, trusts, Governmental Units and the United States Trustee.
- As used in this Notice, the term “Governmental Unit” has the meaning given to it in section 101(27) of the Bankruptcy Code and includes the United States; states; commonwealths; districts; territories; municipalities; foreign states; or departments, agencies or instrumentalities of the foregoing.
- As used in this Notice, the term “Claim” shall mean, as to or against the Debtor and in accordance with section 101(5) of the Bankruptcy Code: (i) any right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured or unsecured; or (ii) any right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured or unsecured.

A CLAIMANT SHOULD CONSULT AN ATTORNEY IF THE CLAIMANT HAS ANY QUESTIONS, INCLUDING WHETHER SUCH CLAIMANT MUST FILE A PROOF OF CLAIM. A CLAIMANT MAY ALSO OBTAIN INFORMATION FROM THE DEBTOR BY CALLING 877-609-3995.

I. WHO MUST FILE A PROOF OF CLAIM AND THE APPLICABLE BAR DATES

- A. **The Bar Dates:** The Bar Date Order establishes the following applicable bar dates for filing proofs of claim in this case:
1. **The General Bar Date.** Except as set forth below, pursuant to the Bar Date Order, all Entities holding Claims, including Governmental Units, and Claims filed under section 503(b)(9) of the Bankruptcy Code, against the Debtor (whether secured, unsecured priority, or unsecured nonpriority) that arose prior to or on January 4, 2011, are required to file proofs of claim by the General Bar Date – **August 1, 2011.**
 2. **The Rejection Damages Bar Date.** Any Entity whose Claim arises out of the Court-approved rejection of an executory contract or unexpired lease, in accordance with section 365 of the Bankruptcy Code and pursuant to an order entered prior to the confirmation of a chapter 11 plan in the Debtor’s chapter 11 case, must file a proof of claim on or before the [later of]: (i) the General Bar Date; (ii) the date that is twenty-eight (28) days after entry of an order approving the rejection of an executory contract or unexpired lease pursuant to which the entity asserting the Rejection

Damages Claim is a party. The later of these dates is referred to in this Notice as the “Rejection Damages Bar Date.”

B. **Entities That MUST File Proofs of Claims by the General Bar Date:** Subject to the terms described above for holders of Claims subject to the Rejection Bar Date and except as set forth in paragraph F below, the following Entities must file proofs of claim on or before the General Bar Date:

1. any entity or person whose Claim against the Debtor is not listed in the Debtor’s Schedules or whose Claim is listed in the Schedules as disputed, contingent or unliquidated and that desires to participate in this Chapter 11 case or share in any distribution in this Chapter 11 case; and
2. any entity or person that believes that its Claim is improperly classified in the Schedules or is listed in an incorrect amount and that desires to have its Claim allowed in a classification or amount other than that identified in the Schedules.

PLEASE NOTE THAT INDIVIDUALS ASSERTING CLAIMS ARISING FROM ABUSE FOR WHICH SUCH INDIVIDUALS BELIEVE THE ARCHDIOCESE OF MILWAUKEE MAY BE LIABLE ARE INSTRUCTED TO FILE A VICTIM/SURVIVOR PROOF OF CLAIM FORM, CONSISTENT WITH THE BAR DATE ORDER AND THE VICTIM/SURVIVOR CLAIM BAR DATE NOTICE. VICTIMS/SURVIVORS MAY OBTAIN COPIES OF THESE FORMS BY CONTACTING THE DEBTOR'S VICTIM ASSISTANCE COORDINATOR BETWEEN THE HOURS OF 9:00 A.M. AND 5:00 P.M. (PREVAILING CENTRAL TIME), MONDAY THROUGH FRIDAY, AT [-], VISITING THE DEBTOR'S NOTICING AGENT'S WEBSITE AT [HTTP://WWW.KCCLLC.NET/ARCHMIL](http://www.kccllc.net/archmil); VISITING THE OFFICE OF THE CLERK OF THE COURT, UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF WISCONSIN, ROOM 126, U.S. COURTHOUSE, 517 EAST WISCONSIN AVENUE, MILWAUKEE, WISCONSIN 53202 DURING REGULAR BUSINESS HOURS, OR FOR A CHARGE ON THE COURT'S WEBSITE ([HTTP://WWW.WIEB.USCOURTS.GOV](http://www.wieb.uscourts.gov)) BY FOLLOWING THE DIRECTIONS FOR ACCESSING THE ECF SYSTEM ON SUCH WEBSITE; OR FOR FREE AT THE NOTICE AGENT'S WEBSITE AT [HTTP://WWW.KCCLLC.NET/ARCHMIL](http://www.kccllc.net/archmil) OR BY VISITING THE DEBTOR'S WEBSITE: ([HTTP://WWW.ARCHMIL.ORG](http://www.archmil.org)).

C. **Entities NOT Required to File Proofs of Claim by the General Bar Date:** The Bar Date Order further provides that the following Entities need not file proofs of claim by the General Bar Date or the Rejection Bar Date, as applicable:

1. any entity or person that has already properly filed a general creditor proof of claim against the Debtor with the Clerk of the Court for the United States Bankruptcy Court for the Eastern District of Wisconsin;
2. any entity or person: (i) whose Claim is listed in the Schedules or any amendments thereto, and (ii) whose Claim is not described therein as

“disputed,” “contingent,” or “unliquidated,” and (iii) who does not dispute the amount or classification of its Claim as set forth in the Schedules;

3. professionals retained by the Debtor or the Committee pursuant to orders of this Court, including Kurtzman Carson Consultants, who assert administrative claims for payment of fees and expenses subject to the Court’s approval pursuant to sections 330, 331(a) and 503(b) of the Bankruptcy Code;
4. any entity or person that asserts an administrative expense claim against the Debtor pursuant to sections 503(b)(1) through (8) of the Bankruptcy Code;
5. any entity or person or entity whose Claim against the Debtor has been allowed by an order of the Court entered on or before the applicable Bar Date; and
6. any entity or person or entity whose Claim has been paid in full.

II. CONSEQUENCES OF FAILURE TO FILE PROOF OF CLAIM

Any Entity that is required to file a proof of claim, but fails to do so by the applicable Bar Date described in this General Creditor Bar Date Notice: (i) may be forever barred from (a) asserting such claim against the Debtor or its estate; (b) voting on any plan of reorganization or of liquidation filed in the Reorganization Case, and (c) participating in any distribution in the Reorganization Case on account of such claim, and that the Debtor need not provide further notices regarding such claim.

If it is unclear from the Schedules whether your Claim is disputed, contingent or unliquidated as to amount or is otherwise properly listed and classified, you must file a proof of claim on or before the applicable Bar Date. Any Entity that relies on the information in the Schedules bears responsibility for determining that its Claim is accurately listed therein. Moreover, Entities who receive individualized proof of claim forms with this General Creditor Bar Date Notice as part of the General Creditor Bar Date Notice Package should verify the accuracy of the amount listed, if any, on such proof of claim form with the amount listed on the Schedules. Any Entity that relies on the amount listed on its individualized proof of claim form bears responsibility for determining that its Claim is accurately listed therein.

III. PROCEDURE FOR FILING PROOFS OF CLAIM BY GENERAL CREDITORS

- A. One original proof of claim must be sent by mail, overnight delivery, courier, or hand delivery to the Court at United States Bankruptcy Court, Eastern District of Wisconsin, 517 East Wisconsin Avenue, Milwaukee, Wisconsin 53202, so as to be received no later than 4:00 p.m. (prevailing Central Time) on the applicable Bar Date, with a copy provided to the Debtor, c/o Whyte Hirschboeck Dudek

S.C., Attn: Daryl L. Diesing, 555 East Wells Street, Suite 1900, Milwaukee, Wisconsin 53202-3819. ***Any proof of claim submitted by facsimile or e-mail will not be accepted and will not be deemed filed until the proof of claim is submitted by the method described in the foregoing sentence.*** Proofs of claim will be deemed filed only when actually received by the Court. If you wish to receive acknowledgement of the Court's receipt of your proof of claim, you must also submit by the applicable Bar Date and concurrently with submitting your original proof of claim: (i) one additional copy of your original proof of claim; and (ii) a self-addressed, stamped return envelope.

- B Proofs of claim must include all documentation required by Bankruptcy Rules 3001(c) and 3001(d), including an original or a copy of any written document that forms the basis of the Claim or, for secured Claims, evidence that the alleged security interest has been perfected.

IV. **RESERVATION OF RIGHTS**

The Debtor reserves the right to: (i) dispute, or to assert offsets or defenses against, any filed Claim or any Claim listed or reflected in the Schedules as to nature, amount, liability, classification or otherwise; and (ii) subsequently designate any Claim as disputed, contingent or unliquidated. Nothing contained in this Notice shall preclude the Debtor from objecting to any Claim, whether scheduled or filed, on any grounds.

V. **ADDITIONAL INFORMATION**

- A. You may be listed as the holder of a Claim against the Debtor in the Schedules. If you hold or assert a Claim that is not listed in the Schedules or if you disagree with the amount or priority of your Claim as listed in the Schedules, or your Claim is listed in the Schedules as contingent, unliquidated, or disputed, you must file a proof of claim. Copies of the Schedules and the Bar Date Order are available for inspection during regular business hours at the office of the Clerk of the Court, United States Bankruptcy Court for the Eastern District of Wisconsin, Room 126 U.S. Courthouse, 517 East Wisconsin Avenue, Milwaukee, Wisconsin 53202. In addition, copies of the Debtor's Schedules and Bar Date Order may be obtained for a charge on the Internet at: the Court's website (<http://www.wieb.uscourts.gov>) by following the directions for accessing the ECF system on such website; or for free at the notice agent's website at <http://www.kccllc.net/ArchMil>, or on the Debtor's website at <http://www.archmil.org>.
- B. Questions concerning the contents of this Notice and requests for proofs of claim should be directed to Debtor at 877-609-3995 between the hours of 9:00 a.m. and 5:00 p.m. (prevailing Central Time), Monday through Friday. **Please note that the Debtor's staff is not permitted to give legal advice. You should consult your own attorney for assistance regarding any other inquiries, such as questions concerning the completion or filing of a proof of claim.**

Dated this ____ day of ____, 2011.

ARCHDIOCESE OF MILWAUKEE
Debtor and Debtor-in-Possession
by its counsel,
Whyte Hirschboeck Dudek S.C.

By: _____

Daryl L. Diesing
State Bar No. 1005793
Bruce G. Arnold
State Bar No. 1002833
Michael E. Gosman
State Bar No. 1078872

P.O. ADDRESS:

555 East Wells Street, Suite 1900
Milwaukee, WI 53202
Telephone: (414) 273-2100
Facsimile: (414) 223-5000
Email: ddiesing@whdlaw.com
barnold@whdlaw.com
mgosman@whdlaw.com

EXHIBIT D

Notice of Deadline for Filing of Victims/Survivors Proofs of Claim

WHD/7838449.1

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN**

In re:

Case No. 11-20059-svk

ARCHDIOCESE OF MILWAUKEE,

Chapter 11

Debtor.

Hon. Susan V. Kelley

NOTICE OF DEADLINE FOR FILING VICTIM/SURVIVOR PROOFS OF CLAIM

**THIS IS AN IMPORTANT NOTICE
YOUR RIGHTS MIGHT BE AFFECTED**

**NOTE: SEPTEMBER 15, 2011, AT 4:00 P.M. PREVAILING CENTRAL
TIME IS THE LAST DATE TO FILE A VICTIM/SURVIVOR PROOF OF CLAIM**

TO ALL PERSONS WITH KNOWN OR POTENTIAL CLAIMS ARISING FROM ABUSE
FOR WHICH SUCH PERSONS BELIEVE THE ARCHDIOCESE OF MILWAUKEE IS
LIABLE:

On January 4, 2011 (the "Petition Date"), the Archdiocese of Milwaukee (the "Archdiocese" or the "Debtor") filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). The Debtor, its address, case number, proof of claim forms and other relevant information related to this Chapter 11 case may be obtained at: (<http://www.kcellc.net/ArchMil>). Numerous individuals (each a "Victim/Survivor" and collectively, the "Victims/Survivors") have asserted abuse claims against the Debtor. Any person who believes that he or she has or may have a claim arising from abuse or for other wrongful conduct for which the person believes the Debtor may be liable (each a "Victim/Survivor Claim," and collectively, the "Victims/Survivors Claims") should carefully read this notice.

**YOU MAY WISH TO CONSULT AN ATTORNEY REGARDING THIS MATTER AND
MAY ALSO OBTAIN INFORMATION FROM THE DEBTOR'S VICTIM ASSISTANCE
COORDINATOR BY CALLING [•]**

Daryl L. Diesing
Bruce G. Arnold
Michael E. Gosman
WHYTE HIRSCHBOECK DUDEK S.C.
555 East Wells Street, Suite 1900
Milwaukee, Wisconsin 53202-4894
Telephone: (414) 273-2100
Facsimile: (414) 223-5000
Email: ddiesing@whdlaw.com
WHD/7838449.1

FILING DEADLINE

The United States Bankruptcy Court for the Eastern District of Wisconsin (the “Court”) has entered an order establishing **September 15, 2011 at 4:00 p.m.** (prevailing Central Time) as the last date and time for each Victim/Survivor to file a proof of claim form (the “Victim/Survivor Bar Date”). The Victim/Survivor Bar Date and the procedures set forth below for filing proofs of claim apply to all Victim/Survivor Claims against the Debtor based upon events occurring prior to January 4, 2011.

WHO MUST FILE

If you believe that you have a Victim/Survivor Claim, you **must** file a **Victim/Survivor Proof of Claim Form** to maintain and/or preserve any claims that you have against the Debtor. **Even if you have already filed a lawsuit against the Debtor prior to January 4, 2011, you must still file a Victim/Survivor Proof of Claim Form to maintain and/or preserve your rights in the Debtor’s chapter 11 case.**

WHO SHOULD NOT FILE

You should **not** file a Victim/Survivor Proof of Claim Form if:

- Your Victim/Survivor Claim has already been paid in full;
- You hold a Victim/Survivor Claim that has been allowed by an order of the Bankruptcy Court on or before the Victims/Survivors Bar Date;
- You hold a Victim/Survivor Claim under a mediation settlement and your only claim is for the unpaid amount stated in the settlement agreement; or
- If you do not have a claim against the Debtor.

PROCEDURES FOR FILING A VICTIM/SURVIVOR PROOF OF CLAIM FORM

To file a Victim/Survivor Proof of Claim Form, you must take the following steps:

- Fill out the Victim/Survivor Proof of Claim Form.
- For additional copies of the Victim/Survivor Proof of Claim Form: photocopy the Victim/Survivor Proof of Claim Form, contact the Debtor's Victim Assistance Coordinator between the hours of 9:00 a.m. and 5:00 p.m. (prevailing Central Time), Monday through Friday, at [•], visit the Debtor's Noticing Agent’s website at <http://www.kcellc.net/ArchMil>; visit the office of the Clerk of the Court, United States Bankruptcy Court for the Eastern District of Wisconsin, Room 126, U.S. Courthouse, 517 East Wisconsin Avenue, Milwaukee, Wisconsin 53202 during regular business hours, or for a charge on the Court’s website (<http://www.wieb.uscourts.gov>) by following the directions for accessing the ECF

system on such website; or for free at the notice agent's website at <http://www.kccllc.net/ArchMil> or visiting the Debtor's website: (<http://www.archmil.org>).

- **Please note that the Debtor's staff is not permitted to give legal advice. You should consult your own attorney for assistance regarding any other inquiries, such as questions concerning the completion or filing of a proof of claim.**
- **Do not file or mail the Victim/Survivor Proof of Claim Form with or to the Court. Instead, all Victim/Survivor Proof of Claim Forms should be sent to the Debtor at the address set forth below.**
- Return the completed Victim/Survivor Proof of Claim Form to the Debtor at the address set forth below no later than **September 15, 2011 at 4:00 p.m. (prevailing Central Time)**. Victim/Survivor Proof of Claim Forms will be deemed timely filed only when they are actually received by the Debtor no later than **September 15, 2011 at 4:00 p.m. (prevailing Central Time)**.
- **Please note that Victim/Survivor Proof of Claim Forms submitted by facsimile, telecopy or electronic mail transmission will not be accepted and will not be deemed filed.** If you are returning a Victim/Survivor Proof of Claim Form by mail, allow sufficient mailing time so that the Victim/Survivor Proof of Claim Form is received on or before **September 15, 2011 at 4:00 p.m. (prevailing Central Time)**. Victim/Survivor Proof of Claim Forms that are postmarked before that date; *i.e.*, the Victim/Survivor Claim Bar Date, but which are received by the Debtor after the Victim/Survivor Claim Bar Date will be considered late.
- All Victim/Survivor Proof of Claim Forms, whether sent by U.S. mail, overnight delivery, courier service, or in person should be delivered to the following address, between the hours of 9:00 a.m. and 5:00 p.m. (prevailing Central Time), Monday through Friday:

Archdiocese of Milwaukee
c/o Whyte Hirschboeck Dudek S.C.
Attn: Daryl L. Diesing
555 East Wells Street, Suite 1900
Milwaukee, Wisconsin 53202

CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM

The deadline for filing a Victim/Survivor Proof of Claim Form is **September 15, 2011 at 4:00 p.m. (prevailing Central Time)**. Any person who is a Victim/Survivor Claim and does not file a Victim/Survivor Proof of Claim by that date may NOT be treated as a creditor for voting or distribution purposes under any plan of reorganization and such claim will be subject to

discharge. Failure to file a Victim/Survivor Claim may prevent such person from voting on any plan of reorganization in this case. Further, if such Victim/Survivor Claim is discharged, the Victim/Survivor Claimant may be forever barred and prevented from asserting his or her Victim/Survivor Claim against the Debtor or its property, and may not receive any payment or distribution in connection with such Victim/Survivor Claim.

CONFIDENTIALITY

Pursuant to the Bar Date Order, Victim/Survivor Proofs of Claim will remain confidential in this bankruptcy case, unless you elect otherwise in Part 1 of the Victim/Survivor Proof of Claim Form. Therefore, the Victim/Survivor Proof of Claim Form that you file will not be available to the general public, but will be kept confidential, except that in addition to the Debtor and Debtor's counsel, information will be provided to the Committee's counsel, and upon request, to the following parties and to any additional parties the Court directs but only after each party agrees to keep the information provided in the Victim/Survivor Proof of Claim Forms confidential:

- (a) Insurance companies that provided insurance that may cover the claims described in the Victim/Survivor Proof of Claim Forms.
- (b) Any future claims representative appointed under a plan of reorganization.
- (c) Any special arbitrator/claims reviewer appointed to review and resolve the claims of Victims/Survivors.
- (d) Any settlement trustee appointed to administer payments to Victims/Survivors.
- (e) Members of the Committee and their personal counsel (after the Victim/Survivor Proof of Claim Form has been redacted to hide the Victim/Survivor's name, address and any other information identified in Part 2(A) of the Victim/Survivor Proof of Claim Form).
- (f) Such other persons as the Court determines should have the information in order to evaluate Victim/Survivor Claims.

Dated this ____ day of ____, 2011.

ARCHDIOCESE OF MILWAUKEE
Debtor and Debtor-in-Possession
by its counsel,
Whyte Hirschboeck Dudek S.C.

By: _____

Daryl L. Diesing
State Bar No. 1005793
Bruce G. Arnold
State Bar No. 1002833
Michael E. Gosman
State Bar No. 1078872

P.O. ADDRESS:

555 East Wells Street, Suite 1900
Milwaukee, WI 53202
Telephone: (414) 273-2100
Facsimile: (414) 223-5000
Email: ddiesing@whdlaw.com
barnold@whdlaw.com
mgosman@whdlaw.com

EXHIBIT E

WHD/7838476.1

The following diocesan priests of the Archdiocese of Milwaukee have been (or would be if they were still alive) restricted from all priestly ministries due to substantiated reports of sexual abuse of a minor:

Raymond A. Adamsky, Fully Restricted from Priestly Ministry
James L. Arimond, Laicized
Ronald J. Bandle, Deceased
James W. Beck, Left Priestly Ministry
Franklyn W. Becker, Laicized
Michael C. Benham, Laicized
Frederick J. Bistricky, Deceased
Daniel A. Budzynski, Laicized
Peter A. Burns, Laicized
S. Joseph Collova, Excommunicated
Andrew P. Doyle, Laicized (Deceased)
William J. Effinger, Deceased
Ronald Engel, Fully Restricted from Priestly Ministry
George A. Etzel, Deceased
William J. Farrell, Deceased
James M. Flynt, Laicized
James M. Godin, Laicized
Edmund H. Haen, Deceased
David J. Hanser, Laicized
Harold A. Herbst, Deceased
George S. Hopf, Deceased
James N. Jablonowski, Fully Restricted from Priestly Ministry
Marvin T. Knighton, Fully Restricted from Priestly Ministry
John T. Knotek, Deceased
Michael J. Krejci, Fully Restricted from Priestly Ministry
Eugene T. Kreuzer, Deceased
Oswald G. Krusing, Deceased
Jerome E. Lanser, Fully Restricted from Priestly Ministry
Eldred B. Lesniewski, Deceased
Daniel J. Massie, Laicized
Lawrence C. Murphy, Deceased
Michael T. Neuberger, Dismissed from clerical state (case in appeal)
Richard W. Nichols, Deceased
George A. Nuedling, Deceased
John A. O'Brien, Laicized
Donald A. Peters, Laicized
Roger W. Schneider, Laicized
Clarence J. Schouten, Deceased
Vincent A. Silvestri, Deceased
Thomas A. Trepanier, Fully Restricted from Priestly Ministry
Jerome A. Wagner, Laicized
John C. Wagner, Fully Restricted from Priestly Ministry

Charles W. Walter, Fully Restricted from Priestly Ministry
Siegfried F. Widera, Deceased

WHD/7838476.1

EXHIBIT F

WHD/7838513.1

In re: Archdiocese of Milwaukee
Case No. 11-20059

**YOU MAY HAVE A CLAIM AGAINST
THE ARCHDIOCESE OF MILWAUKEE**

On January 4, 2011, the Archdiocese of Milwaukee (the "Debtor") filed for protection under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Eastern District of Wisconsin (the "Bankruptcy Court").

**THE LAST DAY TO FILE AN ABUSE CLAIM OR OTHER CLAIM
ALLEGING WRONGFUL CONDUCT AGAINST THE DEBTOR IS
SEPTEMBER 15, 2011
AT 4:00 p.m. (PREVAILING CENTRAL TIME).**

**IF YOU WERE ABUSED BY ANY MEMBER OF THE CLERGY OR ANY
OTHER PERSON CONNECTED WITH THE ARCHDIOCESE OF
MILWAUKEE, YOU MUST FILE A CLAIM BY SEPTEMBER 15, 2011 AT
4:00 p.m. (PREVAILING CENTRAL TIME).**

For more information, including a complete list of all parishes and schools within the geographic territory of the Archdiocese of Milwaukee, or to receive a proof of claim form and associated documents, please (1) visit the Debtor's website at <http://www.archmil.org>; (2) visit the Claims Noticing Agent's designated website at <http://www.kccllc.net/ArchMil>; (3) call the Debtor's Victim Assistance Coordinator at [•]; or (4) write to the Debtor c/o Whyte Hirschboeck Dudek S.C., Attn: Daryl L. Dising, 555 East Wells Street, Suite 1900, Milwaukee, Wisconsin 53202.

EXHIBIT G

CONFIDENTIALITY AGREEMENT

I, _____, state the following:

1. I am aware that pursuant to the order of the United States Bankruptcy Court for the Eastern District Court of Wisconsin in case No. 11-20059 (the “Bankruptcy Case”) [Docket No. ____], I cannot have access to any Victims/Survivors Proofs of Claims and information contained therein unless I enter into this Confidentiality Agreement (a “Confidentiality Agreement”).

2. I understand that the information contained on the Victims/Survivors Proofs of Claim, including but not limited to the names and other personal identification information of a Victim/Survivor or alleged abuser, is confidential (the “Confidential Information”) and I will not provide any Victims/Survivors Proofs of Claim forms to any individual, or share any Confidential Information, with any individual that has not entered into a Confidentiality Agreement concerning the Victims/Survivors Proofs of Claim.

3. I shall use or cause the Confidential Information only to assist me in performing my functions in the Bankruptcy Case and in a manner consistent with the terms and conditions of this Confidentiality Agreement. At no time shall I use the Confidential Information for the benefit of myself or any other third person. Nor shall I use the Confidential Information for any other purpose or proceeding, including but not limited to, any other legal proceedings of any nature, for purposes of evaluation or compiling demographic or statistical information about victim abuse claims against the Archdiocese or any other organization, or for purposes of evaluating or compiling demographic or statistical information about victim abuse claim settlements paid by the Archdiocese or any other organization.

4. In the event that I am subpoenaed or otherwise required to give testimony regarding any Confidential Information, I agree to immediately notify the Archdiocese, through its counsel, and to assist the Archdiocese and its counsel in preventing the disclosure of any Confidential Information. The notice required by this section shall be provided to:

Daryl L. Diesing, Bruce G. Arnold and Michael E. Gosman
Whyte Hirschboeck Dudek S.C.
555 East Wells Street, Suite 1900
Milwaukee, WI 53202
414-978-5523
ddiesing@whdlaw.com
barnold@whdlaw.com
mgosman@whdlaw.com

5. This Confidentiality Agreement creates a continuing and permanent obligation to maintain confidentiality and shall not terminate at the conclusion of the Bankruptcy Case.

6. In the event I breach this Confidentiality Agreement, the Archdiocese shall be entitled, in addition to whatever other remedies are or might be available at law or in equity, to compel specific performance by me or to obtain injunctive relief preventing any further breach, including, without limitation, immediate return of all Confidential Information, and including all reasonable attorneys fees and costs incurred as a result of any breach, and I shall not oppose such relief.

7. I further understand that any breach of this Confidentiality Agreement may give rise to sanctions for contempt of court, and to separate legal and equitable recourse by the adversely affected party. I further consent to the exercise of personal jurisdiction by the United States Bankruptcy Court for the Eastern District of Wisconsin and waive any objection as to venue in connection with any effort to enforce this Confidentiality Agreement.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct and that this Confidentiality Agreement is executed on the _____ day of _____, 2011 at _____ in _____.

Signature

Printed Name

Employer

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

In re:

Case No. 11-20059-svk

ARCHDIOCESE OF MILWAUKEE,

Chapter 11

Debtor.

Hon. Susan V. Kelley

ORDER APPROVING DEBTOR'S MOTION FOR ORDER ESTABLISHING
DEADLINES FOR FILING PROOFS OF CLAIM AND APPROVING FORM
AND MANNER OF NOTICE THEREOF

Upon the Motion of the Archdiocese of Milwaukee, as debtor and debtor-in-possession (the "Debtor"), for entry of an order (i) fixing the time within which proofs of claim against the Debtor's estate may be filed (the "Bar Dates"); (ii) approving the proposed proof of claim forms; (iii) approving procedures for maintaining the confidentiality of proofs of claim filed by victims/survivors of sexual abuse; (iv) approving the form and manner of the proposed notices of the Bar Dates as providing fair, reasonable and adequate notice of the Bar Dates; and

Daryl L. Diesing
Bruce G. Arnold
Michael E. Gosman
WHYTE HIRSCHBOECK DUDEK S.C.
555 East Wells Street, Suite 1900
Milwaukee, Wisconsin 53202-4894
Telephone: (414) 273-2100
Facsimile: (414) 223-5000
Email: ddiesing@whdlaw.com

(v) granting related relief (the "Motion")¹; and it appearing that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and it appearing that this proceeding is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and it appearing that venue of this proceeding and the Motion in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and notice of the Motion and the opportunity for a hearing on the Motion was appropriate under the particular circumstances and that no other or further notice need be given; and after due deliberation and sufficient cause appearing therefore;

The Court hereby finds:

1. The General Creditor Bar Dates requested in the Motion provide potential claimants a significantly greater notice period than required by Bankruptcy Rules 2002(a)(7) or 3002(c)(1).

2. The Victims/Survivors Bar Date requested in the Motion provides Victims/Survivors a significantly greater notice period than required by Bankruptcy Rule 2002(a)(7).

3. The Victims/Survivors Proof of Claim form is necessary and appropriate under the circumstances of this case.

4. Notice by mail to unknown Victims/Survivors is impracticable and for that reason, as well as to supplement notice by mail, the Court finds the Publication Protocol proposed by the Debtor, and Form of Publication Notice (the Publication Notice is attached hereto as Exhibit F) as outlined in the Motion, is proper.

5. The notice procedures outlined in the Motion are designed to reach the widest possible audience of creditors who may not otherwise have notice of this Reorganization Case.

¹ Capitalized terms not defined herein shall have the same meaning ascribed to them in the Motion.

6. The Bar Date Notice and Publication Notice will provide creditors with sufficient information to file properly prepared and executed proofs of claim in a timely manner while simultaneously protecting the confidentiality of Victims/Survivors.

7. The Bar Date Notices and Publication Notice in the forms and manners as proposed by the Debtor in the Motion are fair and reasonable and will provide good, sufficient, and due notice to all creditors, including creditors with foreign addresses, of their rights and obligations in connection with claims they may assert against the Debtor's estate in this Reorganization Case.

It is hereby ordered:

8. The Motion is GRANTED.

THE BAR DATES

9. By August 1, 2011, all entities² including governmental units,³ holding pre-petition claims, including pre-petition claims entitled to administrative expense status under § 503(b)(9) of the Bankruptcy Code, but excluding Victims/Survivors Claims, must file proofs of claim (the "General Bar Date").

10. By September 15, 2011, all Claims of Victims/Survivors must be filed (the "Victims/Survivors Bar Date"). Any Victims/Survivors who filed and had pending as of the Petition Date, a lawsuit against the Debtor must submit a Victim/Survivor Proof of Claim Form prior to the Victims/Survivors Bar Date.

11. The deadline for filing a proof of claim in connection with the Debtor's rejection of executory contracts and/or unexpired leases is the *later of*: (i) the General Bar Date, or (ii) the date that is twenty-eight (28) days after entry of an order approving the rejection of an executory

² As used herein, the term "entity" has the meaning given to it in § 101(15) of the Bankruptcy Code.

³ As used herein, the term "governmental unit" has the meaning given to it in § 101(27) of the Bankruptcy Code.

contract or unexpired lease pursuant to which the entity asserting the Rejection Damages Claim is a party (the "Rejection Damages Bar Date"). The Rejection Bar Date shall not apply to the claims of Victims/Survivors.

12. If the Debtor amends its Schedules of Assets and Liabilities and/or Statements of Financial Affairs (collectively, the "Schedules") so as to add an entity not currently listed therein or to alter the amount, priority, classification, or other status of a listed claim; the holders of such claims (the "Amended Schedules Claims") may file amended or original proofs of claim to take into account the amendment(s) to the Schedules. The deadline for filing Amended Schedules Claims shall be the *later of* (a) the General Bar Date, or (b) twenty-eight (28) days after the holder of a claim is served with notice that the Debtor amended its Schedules to reduce, delete, or change the amount, priority, classification, or other status of such a claim (the "Amended Schedules Bar Date").

WHO MUST FILE PROOFS OF CLAIM

13. Except as set forth in paragraph 14 below, all persons and entities holding prepetition claims, including, without limitation, the following entities, must file the proofs of claim on or before the applicable Bar Date:

(i) Any person or entity whose prepetition claim against the Debtor is not listed in the Debtor's Schedules or whose prepetition claim is listed in the Schedules but is listed as disputed, contingent or unliquidated and that desires to participate in this Reorganization Case or share in any distribution in this Reorganization Case;

(ii) Any person or entity that believes that its prepetition claim is improperly classified in the Schedules or is listed in an incorrect amount and that desires to have its claim allowed in a classification or amount other than that identified in the Schedules; and

(iii) Any Victim/Survivor who believes that he or she has a claim against the Debtor, including but not limited to Victims/Survivors who have previously filed lawsuits against the Debtor, and Victims/Survivors who have never filed a lawsuit, entered into a settlement or reported their abuse.

14. The following persons or entities are not required to file a proof of claim on or before the applicable Bar Date:

(i) Any person or entity that has already properly filed a proof of claim against the Debtor with the Debtor or the Clerk of the Court for the United States Bankruptcy Court for the Eastern District of Wisconsin. Victims/Survivors that previously filed with the Court or provided to Debtor's counsel a proof of claim that contains substantially all the information required by the Victim/Survivor Proof of Claim Form, as such term is hereafter defined;

(ii) Any Victims/Survivors only making a claim for unpaid amounts due or to become due under a settlement agreement reached in the Debtor's voluntary mediation program;⁴

(iii) Any person or entity: (i) whose claim is listed in the Schedules or any amendments thereto, and (ii) whose claim is not described therein as "disputed," "contingent," or "unliquidated," and (iii) who does not dispute the amount or classification of its claim as set forth in the Schedules;

(iv) Professionals retained by the Debtor or the Committee pursuant to orders of this Court, including Kurtzman Carson Consultants ("KCC"), who assert administrative claims for payment of fees and expenses subject to the Court's approval pursuant to §§ 330, 331(a) and 503(b) of the Bankruptcy Code;

⁴ As disclosed in Schedule F to the Debtor's Schedules, the Debtor acknowledges that it remains obligated to pay \$702,000 to twenty-two (22) victims/survivors (the "In-Settlement Victims/Survivors") pursuant to their pre-petition Settlement Agreements.

(v) Any person or entity that asserts an administrative expense claim against the Debtor pursuant to §§ 503(b)(1) through (8) of the Bankruptcy Code;

(vi) Any person or entity whose claim against the Debtor has been allowed by an order of the Court entered on or before the applicable Bar Date; and

(vii) Any person or entity whose claim has been paid in full. For the avoidance of doubt, this does not include Victims/Survivors who were paid pursuant to settlement agreements but believe they have additional claims against the Debtor beyond what was agreed to in the settlement.

PROOF OF CLAIM FORMS

15. With respect to prepetition creditors that are not Victims/Survivors – *i.e.*, holders of General Claims, Rejection Damages Claims, or Amended Schedules Claim (collectively, the “The General Creditor Claims”) – the Court approves the proof of claim form attached hereto as Exhibit A (the “General Creditor Proof of Claim Form”).

16. Each General Creditor Proof of Claim Form filed must: (a) be written in English; (b) be denominated in lawful currency of the United States as of the Petition Date; and (c) have attached copies of any writings upon which the claim is based in accordance with Bankruptcy Rules 3001(c) and 3001(d), including for secured claims, evidence that the alleged security interest has been perfected; and (d) be originally executed and filed with the Court on or before the applicable Bar Date, with a copy provided to the Debtor c/o Whyte Hirschboeck Dudek S.C., Attn: Daryl L. Diesing, 555 East Wells Street, Suite 1900, Milwaukee, WI 53202-3819. Proofs of claim must be mailed or delivered by messenger or overnight courier; proofs of claim sent by facsimile, telecopy, or e-mail will not be accepted.

17. With respect to prepetition creditors that are Victims/Survivors, the Court approves the proof of claim form attached hereto as Exhibit B (the "Victims/Survivors Proof of Claim Form").

18. The Court further orders the following confidentiality protocol (the "Confidentiality Protocol") be followed in this Reorganization Case:

(i) Victims/Survivors are directed not to file a Victim/Survivor Proof of Claim Form with the Court. Instead, the original and two copies of each Victim/Survivor Proof of Claim Form must be sent to the Debtor, c/o Whyte Hirschboeck Dudek S.C., Attn: Daryl L. Diesing, 555 East Wells Street, Suite 1900, Milwaukee, Wisconsin 53202-3819.

(ii) Victim/Survivor Proof of Claim Forms submitted by Victims/Survivors will not be available to the general public unless a Victim/Survivor affirmatively indicates his or her desire that the proof of claim be made public in Part 1 of the Victim/Survivor Proof of Claim Form. The Confidentiality Protocol is for the benefit of the Victims/Survivors. Accordingly, Victims/Survivors may elect to make any of the information contained in a Victim/Survivor Proof of Claim public even if they elected to file the Proof of Claim confidentially. If a Victim/Survivor Proof of Claim form provides in Part 1 that the Victim/Survivor desires his or her Proof of Claim form be made public, the Debtor's counsel is directed to file the Proof of Claim form with the Court, but prior to filing the Debtor's counsel may attempt to verify that Part 1 was completed according to the Victim/Survivor's wishes.

(iii) Victim/Survivor Proof of Claim Forms submitted by a Victim/Survivor shall be held and treated as confidential (unless the Victim/Survivor elects otherwise in Part 1 of the Victim/Survivor Proof of Claim Form) by the Debtor and Debtor's counsel and upon request to the parties listed below (the "Permitted Parties") subject to each Permitted Party executing and

returning to Debtor's counsel the confidentiality agreement attached as Exhibit G to this Order (the "Confidentiality Agreement"), and to such other persons as the Court determines, provided, however, that all parties with access to the Victim/Survivor Proof of Claim Forms shall agree to keep the information provided in a Victim/Survivor Proof of Claim Form confidential (unless the Victim/Survivor elects otherwise in Part 1 of the Victim/Survivor Proof of Claim Form).⁵

(iv) The Permitted Parties include:

- (a) Counsel for the Official Committee of Unsecured Creditors;
- (b) Insurance companies that provided insurance that may cover the claims described in the Victim/Survivor Proof of Claim Forms;
- (c) Any future claims representative appointed under a plan of reorganization;
- (d) Any special arbitrator/claims reviewer appointed to review and resolve the claims of Victims/Survivors;
- (e) Any settlement trustee appointed to administer payments to Victims/Survivors;
- (f) Members of the Committee and their personal counsel (after the Victim/Survivor Proof of Claim Form has been redacted to remove the Victim/Survivor's name, address and any other information identified in Part 2(A) of the Victim/Survivor Proof of Claim Form); and
- (g) Such other persons as the Court determines should have the information in order to evaluate Victim/Survivor Claims.

⁵ Access to the Victim/Survivor Proof of Claim Forms extends only to the natural person who executes the Confidentiality Agreement. A separate Confidentiality Agreement must be signed by each natural person who seeks access to the records on behalf of a Permitted Party.

19. In addition to being available in English, the Victim/Survivor Proof of Claim Form will also be available in Spanish and Hmong because of the large Hispanic and Hmong communities in the geographic territory of the Debtor (the "Region").

20. Each Victim/Survivor Proof of Claim Form filed must: (i) be written in the English, Spanish, or Hmong languages; (ii) be denominated in lawful currency of the United States as of the Petition Date; and (iii) have attached copies of any writings upon which the claim is based in accordance with Bankruptcy Rules 3001(c) and 3001(d); (iv) be originally executed and sent to the Debtor, c/o Whyte Hirschboeck Dudek S.C., Attn: Daryl L. Diesing, 555 East Wells Street, Suite 1900, Milwaukee, Wisconsin 53202-3819 on or before the applicable Bar Date (**NOT FILED WITH THE COURT**). Proofs of claim must be mailed or delivered by messenger or overnight courier; proofs of claim sent by facsimile, telecopy, or e-mail will not be accepted.

21. The Debtor may retain and compensate any translation services that might be needed to translate the Victim/Survivor Proof of Claim Forms into Spanish and Hmong from English and to translate any completed Victim/Survivor Proof of Claim Forms into English from Spanish or Hmong.

22. Pursuant to Fed. R. Bankr. P. 3003(c)(2), any holder of a claim whether a General Creditor Claim, Victim/Survivor Claim, Rejection Damages Claim, or Amended Schedules Claim that is not subject to one of the exceptions enumerated above who fails to timely file a proof of claim in the appropriate form be forever barred from (a) asserting such claim against the Debtor or its estate; (b) voting on any plan of reorganization filed in the Reorganization Case, and (c) participating in any distribution in the Reorganization Case on account of such claim, and that the Debtor need not provide further notices regarding such claim.

NOTICE PROCEDURES

23. Within five (5) days of the entry of this Order, the Debtor shall serve by United States mail, first-class postage prepaid: (i) notice of the General Bar Date and the Rejection Damages Bar Date, substantially in the form attached hereto as Exhibit C and incorporated herein by reference (the "General Creditor Bar Date Notice"); (ii) a General Creditor Proof of Claim Form substantially in the form attached hereto as Exhibit A; and (iii) the Bar Date Order (together with the General Creditor Bar Date Notice and the General Creditor Proof of Claim Form, the "General Creditor Bar Date Notice Package"), upon: (a) all entities who have filed a notice of appearance in the Debtor's case; (b) all entities listed in the Debtor's Schedules; (c) all entities that have previously filed proofs of claim in the Debtor's case; (d) any other entities or their counsel, including governmental units, known to Debtor as entities who may have claims against the estate; and (e) all parties or their counsel listed on the Service List as maintained pursuant to this Court's Case Management Order.

24. The Debtor shall make the following available to the public: (i) a notice of the Victims/Survivors Bar Date substantially in the form attached hereto as Exhibit D and incorporated herein by reference (the "Victims/Survivors Bar Date Notice," and together with the General Creditor Bar Date Notice, each a "Bar Date Notice" and collectively, the "Bar Date Notices"); (ii) a Victim/Survivor Proof of Claim Form, substantially in the form attached hereto as Exhibit B; (iii) a list of diocesan priests against whom the Debtor has received substantiated reports of sexual abuse of a minor (the "Abusers") in substantially the form attached hereto as Exhibit E; and (iv) the Bar Date Order (together with the Victims/Survivors Bar Date Notice and

the Victim/Survivor Proof of Claim Form, the "Victim/Survivor Bar Date Notice Package," and together with the General Creditor Bar Date Package, the "Bar Date Packages").

25. The Debtor shall provide notice of the Victims/Survivors Bar Date by serving the Victim/Survivor Notice Package on Settled Victims/Survivors, In-Settlement Victims/Survivors, Represented Claimants, and Unrepresented Claimants (as such terms are defined in the Debtor's Motion for Special Confidentiality Procedures to Protect Victims/Survivors [Docket No. 165]) in the fashion approved by any Special Confidentiality Procedures Order approved by this Court.

26. The Debtor will also serve the Victim/Survivor Notice Package on all individuals currently known to the Chancellor of the Archdiocese or the Archdiocese's Victim Assistance Coordinator as having:

- (i) filed or threatened to file lawsuits against the Archdiocese that allege they were abused;
- (ii) contacted the Archdiocese to report that they were victims of abuse, whether or not that individual's claim was considered to be substantiated and whether or not the report was written or verbal;
- (iii) received payment from the Debtor as a result of an allegation of abuse;
- (iv) participated in the Mediation Program but not entered into a settlement agreement; and
- (v) been provided counseling, spiritual direction, or therapy support related to abuse or been referred for same by the Debtor.

27. The Debtor will serve the individuals included in the preceding paragraph (the "Potential Claimants") using the same confidentiality procedures as those approved by the Court for Unrepresented Claimants, unless such individuals have counsel known to the Debtor, in

which case service will be effectuated through such counsel, in the same fashion as approved by the Court for service on the Represented Claimants.

28. The Debtor shall, pursuant to Bankruptcy Rule 2002(l), give notice by publication to certain creditors including: (i) unknown Victims/Survivors; (ii) those creditors to whom no other notice was sent and who are unknown or not reasonably ascertainable by the Debtor; (iii) known creditors with addresses unknown by the Debtor; and (iv) creditors with potential claims unknown by the Debtor.

29. Accordingly, the Debtor shall provide notice of the Bar Dates by causing a copy of the notice attached hereto as Exhibit F (the "Publication Notice") to be published as follows:

(i) Publication twice (in English) in each of the following publications:

Appleton Post-Crescent
Beaver Dam Daily Citizen
Catholic Herald
Chicago Tribune
Eau Claire Leader Telegram
Fond du Lac Reporter
Green Bay Press Gazette
Hometown Publications (all newspapers)
Janesville Messenger
Kenosha News
La Crosse Tribune
Los Angeles Times
My Community Now (all newspapers)
Milwaukee Journal Sentinel
Racine Journal Times
Sheboygan Press
Shepherd Express
Waukesha Freeman
Wausau Daily Herald
West Bend Daily News
Wisconsin State Journal

(ii) Publication twice (in Spanish) in each of the following publications:

Milwaukee Journal Sentinel
Spanish Journal

(iii) Publication twice (in Hmong) in the following publication:

HmongHello!

(iv) In addition, the Debtor shall provide further notice of the Bar Dates by taking the following measures:

(a) The Debtor will provide an 8.5" by 11" copy of the Publication Notice to all Catholic parishes and all Catholic daycares, preschools, kindergartens, elementary, middle, and high schools and orphanages in the Region (the "Schools") and request that each parish or School post the Publication Notice in a prominent location for at least six weeks;

(b) Archbishop Jerome ListECKi will prepare a letter notifying Catholics in the Region of the Bar Dates and will request that each parish in the Region include said letter at least once in its parish bulletin;

(c) The Debtor will post the Publication Notice on the following websites:

www.archmil.org

www.kccllc.net/archmil;

(d) The Debtor will maintain a toll free number answered by the Archdiocese's Victim Assistance Coordinator which may be used by potential claimants to ask questions or obtain copies of Victim/Survivor Proof of Claim Form and Non-Victim/Survivor Proof of Claim Form;

(e) The Debtor will request Schools in the Region provide the Debtor with current alumni mailing lists, if any, and will send the Publication Notice and the list of Abusers in substantially the form attached hereto as Exhibit E to any individual that appears on lists provided by a School;

(f) The Debtor will request that the agencies listed on the Debtor's website at <http://www.archmil.org/offices/sexual-abuse-prevention/community-agencies.htm> that

offer free services to victims of sexual abuse in the Region post the Publication Notice in a prominent location;

(g) The Debtor will issue a press release announcing the Bar Date;

(h) The Debtors will mail a copy of the Victim/Survivor Bar Date Notice to each of the following individuals or entities within the Region: all police departments, the office of the District Attorney, the office of the attorney general, all licensed therapists known by the Archdiocese who work with survivors of sexual abuse, the regional headquarters of Alcoholics Anonymous and Narcotics Anonymous, all drug treatment centers, hospitals and public libraries; and

(i) The Debtor will file a certificate of notice by publication attesting to the efforts it made to comply with these procedures with the Court and file it in the Reorganization Case by September 23, 2011.

30. In the Debtor's judgment, the Publication Protocol described above is likely to reach the widest possible audience of creditors who may not otherwise have notice of this Reorganization Case.

31. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation and enforcement of this Order.

###

EXHIBIT A

General Creditor Proof of Claim Form

WHD/7838268.1

UNITED STATES BANKRUPTCY COURT		PROOF OF CLAIM
Name of Debtor: Archdiocese of Milwaukee		Case Number: 11-20059-svk
NOTE: This form should not be used to make a claim for an administrative expense arising after the commencement of the case. A request for payment of an administrative expense may be filed pursuant to 11 U.S.C. §503. This form should also not be used in connection with claims by Victims/Survivors.		
Name of Creditor (The person or other entity to whom the debtor owes money or property):		<input type="checkbox"/> Check this box to indicate that this claim amends a previously filed claim.
Name and address where notices should be sent:		Court Claim Number: _____ (if known)
Telephone number:		Filed on: _____
Name and address where payment should be sent (if different from above):		<input type="checkbox"/> Check box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars.
Telephone number:		<input type="checkbox"/> Check this box if you are the debtor or trustee in this case.
1. Amount of Claim as of Date Case Filed: \$ _____ If all or part of your claim is secured, complete item 4 below; however, if all of your claim is unsecured, do not complete item 4. If all or part of your claim is entitled to priority, complete item 5. <input type="checkbox"/> Check this box if claim includes interest or other charges in addition to the principal amount of claim. Attach itemized statement of interest charges.		5. Amount of Claim Entitled to Priority under 11 U.S.C. §507(a). If any portion of your claim falls in one of the following categories, check the box and state the amount. Specify the priority of the claim. <input type="checkbox"/> Domestic support obligations under 11 U.S.C. §507(a)(1)(A) or (a)(1)(B). <input type="checkbox"/> Wages, salaries, or commissions (up to \$11,725 *) earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier – 11 U.S.C. § 507(a)(4). <input type="checkbox"/> Contributions to an employee benefit plan – 11 U.S.C. §507(a)(5). <input type="checkbox"/> Up to \$2,600* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use – 11 U.S.C. §507(a)(7). <input type="checkbox"/> Taxes or penalties owed to governmental units – 11 U.S.C. §507(a)(8). <input type="checkbox"/> Other – Specify applicable paragraph of 11 U.S.C. §507(a) (_____)
2. Basis for Claim: _____ (See instruction #2 on reverse side.)		
3. Last four digits of any number by which creditor identifies debtor: _____ 3a. Debtor may have scheduled account as: _____ (See instruction #3a on reverse side.)		
4. Secured Claim (see instruction #4 on reverse side). Check the appropriate box if your claim is secured by a lien on property or a right of setoff and provide the requested information. Nature of property or right of setoff: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other _____ Describe: _____ Value of Property: \$ _____ Annual Interest Rate: _____ % Amount of arrearage and other charges as of time case filed included in secured claim, if any: \$ _____ Basis for perfection: _____ Amount of Secured Claim: \$ _____ Amount Unsecured: \$ _____		<input type="checkbox"/> Taxes or penalties owed to governmental units – 11 U.S.C. §507(a)(8). <input type="checkbox"/> Other – Specify applicable paragraph of 11 U.S.C. §507(a) (_____)
6. Credits: The amount of all payments on this claim has been credited for the purpose of making this proof of claim.		Amount entitled to priority: \$ _____ *Amounts are subject to adjustment on 4/1/13 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.
7. Documents: Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages and security agreements. You may also attach a summary. Attach redacted copies of documents providing evidence of perfection of a security interest. You may also attach a summary. (See instruction 7 and definition of "redacted" on reverse side). DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING. If the documents are not available, please explain:		
Date:	Signature: The person filing this claim must sign it. Sign and print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any.	
		FOR COURT USE ONLY

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.

INSTRUCTIONS FOR PROOF OF CLAIM FORM

The instructions and definitions below are general explanations of the law. In certain circumstances, such as bankruptcy cases not filed voluntarily by the debtor, there may be exceptions to these general rules.

Items to be completed in Proof of Claim form

<p>Court, Name of Debtor and Case Number: Fill in the federal judicial district where the bankruptcy case was filed (for example, Central District of California), the bankruptcy debtor's name, and the bankruptcy case number. If the creditor received a notice of the case from the bankruptcy court, all of this information is located at the top of the notice.</p> <p>Creditor's Name and Address: Fill in the name of the person or entity asserting a claim and the name and address of the person who should receive notices issued during the bankruptcy case. A separate space is provided for the payment address if it differs from the notice address. The creditor has a continuing obligation to keep the court informed of its current address. See Federal Rule of Bankruptcy Procedure (FRBP) 2002(g).</p> <p>1. Amount of Claim as of Date Case Filed: State the total amount owed to the creditor on the date of the Bankruptcy filing. Follow the instructions concerning whether to complete items 4 and 5. Check the box if interest or other charges are included in the claim.</p> <p>2. Basis for Claim: State the type of debt or how it was incurred. Examples include goods sold, money loaned, services performed, personal injury/wrongful death, car loan, mortgage note, and credit card. If the claim is based on the delivery of health care goods or services, limit the disclosure of the goods or services so as to avoid embarrassment or the disclosure of confidential health care information. You may be required to provide additional disclosure if the trustee or another party in interest files an objection to your claim.</p> <p>3. Last Four Digits of Any Number by Which Creditor Identifies Debtor: State only the last four digits of the debtor's account or other number used by the creditor to identify the debtor.</p> <p>3a. Debtor May Have Scheduled Account As: Use this space to report a change in the creditor's name, a transferred claim, or any other information that clarifies a difference between this proof of claim and the claim as scheduled by the debtor.</p>	<p>4. Secured Claim: Check the appropriate box and provide the requested information if the claim is fully or partially secured. Skip this section if the claim is entirely unsecured. (See DEFINITIONS, below.) State the type and the value of property that secures the claim, attach copies of lien documentation, and state annual interest rate and the amount past due on the claim as of the date of the bankruptcy filing.</p> <p>5. Amount of Claim Entitled to Priority Under 11 U.S.C. §507(a). If any portion of your claim falls in one or more of the listed categories, check the appropriate box(es) and state the amount entitled to priority. (See DEFINITIONS, below.) A claim may be partly priority and partly non-priority. For example, in some of the categories, the law limits the amount entitle to priority.</p> <p>6. Credits: An authorized signature on this proof of claim serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.</p> <p>7. Documents: Attach to this proof of claim form redacted copies documenting the existence of the debt and of any lien securing the debt. You may also attach a summary. You must also attach copies of documents that evidence perfection of any security interest. You may also attach a summary. FRBP 3001(c) and (d). If the claim is based on the delivery of health care goods or services, see instruction 2. Do not send original documents, as attachments may be destroyed after scanning.</p> <p>Date and Signature: The person filing this proof of claim must sign and date it. FRBP 9011. If the claim is filed electronically, FRBP 5005(a)(2), authorizes courts to establish local rules specifying what constitutes a signature. Print the name and title, if any, of the creditor or other person authorized to file this claim. State the filer's address and telephone number if it differs from the address given on the top of the form for purposes of receiving notices. Attach a complete copy of any power of attorney. Criminal penalties apply for making a false statement on a proof of claim.</p>
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DEFINITIONS		INFORMATION
<p>Debtor A debtor is the person, corporation, or other entity that has filed a bankruptcy case.</p> <p>Creditor A creditor is a person, corporation, or other entity owed a debt by the debtor that arose on or before the date of the bankruptcy filing. See 11 U.S.C. §101 (10)</p> <p>Claim A claim is the creditor's right to receive payment on a debt owed by the debtor that arose on the date of the bankruptcy filing. See 11 U.S.C. §101 (5). A claim may be secured or unsecured.</p> <p>Proof of Claim A proof of claim is a form used by the creditor to indicate the amount of the debt owed by the debtor on the date of the bankruptcy filing. The creditor must file the form with the clerk of the same bankruptcy court in which the bankruptcy case was filed.</p> <p>Secured Claim Under 11 U.S.C. §506(a) A secured claim is one backed by a lien on property of the debtor. The claim is secured so long as the creditor has the right to be paid from the property prior to other creditors. The amount of the secured claim cannot exceed the value of the property. Any amount owed to the creditor in excess of the value of the property is an unsecured claim. Examples of liens on property include a mortgage on real estate or a security interest in a car.</p>	<p>A lien may be voluntarily granted by a debtor or may be obtained through a court proceeding. In some states, a court judgment is a lien. A claim also may be secured if the creditor owes the debtor money (has a right to setoff).</p> <p>Unsecured Claim An unsecured claim is one that does not meet the requirements of a secured claim. A claim may be partly unsecured if the amount of the claim exceeds the value of the property on which the creditor has a lien.</p> <p>Claim Entitled to Priority Under 11 U.S.C. §507(a) Priority claims are certain categories of unsecured claims that are paid from the available money or property in a bankruptcy case before other unsecured claims.</p> <p>Redacted A document has been redacted when the person filing it has masked, edited out, or otherwise deleted, certain information. A creditor should redact and use only the last four digits of any social-security, individual's tax-identification, or financial-account number, all but the initials of a minor's name and only the year of any person's date of birth.</p> <p>Evidence of Perfection Evidence of perfection may include a mortgage, lien, certificate of title, financing statement, or other document showing that the lien has been filed or recorded.</p>	<p>Acknowledgement of Filing of Claim To receive acknowledgment of your filing, you may either enclose a stamped self-addressed envelope and a copy of this proof of claim or you may access the court's PACER system (www.pacer.psc.uscourts.gov) for a small fee to view your filed proof of claim.</p> <p>Offers to Purchase a Claim Certain entities are in the business of purchasing claims for an amount less than the face value of the claims. One or more of these entities may contact the creditor and offer to purchase the claim. Some of the written communications from these entities may easily be confused with official court documentation or communications from the debtor. These entities do not represent the bankruptcy court or the debtor. The creditor has no obligation to sell its claim. However, if the creditor decides to sell its claim, any transfer of such claim is subject to FRBP 3001(e), any applicable provision of the Bankruptcy Code (11 U.S.C. § 101 et seq.), and any applicable orders of the bankruptcy court.</p>

EXHIBIT B

Victim/Survivor Proof of Claim Form

WHD/7838279.1

THIS SPACE IS FOR COURT USE ONLY

[Both English and Spanish Versions Will Be Provided]

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

In re:

ARCHDIOCESE OF MILWAUKEE,

Debtor.

)
) Case No. 11-20059-svk

)
) Chapter 11

)
) **VICTIM/SURVIVOR PROOF OF**
) **CLAIM**

IMPORTANT:
THIS FORM MUST BE RECEIVED NO LATER THAN
SEPTEMBER 15, 2011 AT 4:00 P.M.

Carefully read the instructions included with this VICTIM/SURVIVOR PROOF OF CLAIM FORM and complete ALL applicable questions. Please print clearly and use blue or black ink. Send the *original together with two copies* to: Debtor's Counsel, Whyte Hirschboeck Dudek S.C., attention Daryl L. Diesing, 555 East Wisconsin Avenue, Suite 1900, Milwaukee, Wisconsin 53202-3819.

YOU MAY WISH TO CONSULT AN ATTORNEY REGARDING THIS MATTER, AND YOU MAY ALSO OBTAIN INFORMATION FROM THE ARCHDIOCESE'S VICTIM ASSISTANCE COORDINATOR AT 800-XXX-XXXX.

TO BE VALID, THIS PROOF OF CLAIM MUST BE SIGNED BY THE VICTIM/SURVIVOR OR MUST BE SIGNED BY THE VICTIM/SURVIVOR'S ATTORNEY. IF THE VICTIM/SURVIVOR IS DECEASED OR INCAPACITATED, THE FORM MAY BE SIGNED BY THE VICTIM/SURVIVOR'S REPRESENTATIVE OR THE ATTORNEY FOR THE ESTATE. IF THE VICTIM/SURVIVOR IS A MINOR, THE FORM MAY BE SIGNED BY THE VICTIM/SURVIVOR'S PARENT OR LEGAL GUARDIAN OR THE VICTIM/SURVIVOR'S ATTORNEY.

Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§152 and 3571

UNLESS YOU INDICATE OTHERWISE IN PART 1 BELOW, YOUR IDENTITY WILL BE KEPT STRICTLY CONFIDENTIAL, UNDER SEAL AND OUTSIDE THE PUBLIC RECORD BY THE UNITED STATES BANKRUPTCY COURT. HOWEVER, INFORMATION IN THIS CLAIM WILL BE PROVIDED PURSUANT TO COURT-APPROVED GUIDELINES TO COUNSEL FOR COMMITTEE OF UNSECURED CREDITORS AND TO SUCH OTHER PERSONS AS THE COURT DETERMINES NEED THE INFORMATION IN ORDER TO EVALUATE THE CLAIM

PART 1. CONFIDENTIALITY

THIS VICTIM/SURVIVOR PROOF OF CLAIM FORM (ALONG WITH ANY ACCOMPANYING EXHIBITS AND ATTACHMENTS) WILL BE MAINTAINED AS CONFIDENTIAL UNLESS YOU EXPRESSLY REQUEST THAT IT BE PUBLICLY AVAILABLE BY CHECKING THE BOX AND SIGNING BELOW.

I do not want this Proof of Claim Form (along with any accompanying exhibits and attachments) to be kept confidential. Please verify this election by signing directly below.

Signature: _____

Print Name: _____

PART 2: IDENTIFYING INFORMATION

A. Victim/Survivor

First Name Middle Initial Last Name Jr/Sr/III

Mailing Address: (If party is incapacitated, is a minor or is deceased, please provide the address of the individual submitting the claim).

City State/Prov. Zip Code (Postal Code) Country (if other than U.S.A.)

Telephone No.

Home: Work: Cell:

Email address

May we leave voicemails for you regarding your claim? yes no

May we send confidential information to your email: yes no

Birth Date Male Female
Month Day Year

Any other name or names by which Victim/Survivor has been known:

B. Victim/Survivor's Attorney (if any):

Law Firm Name

Attorney's First Name Middle Initial Last Name

Street Address

City State/Prov. Zip Code (Postal Code) Country (if other than U.S.A.)

Telephone No. Fax No. E-mail address

PART 3: NATURE OF COMPLAINT
(Attach additional separate sheets if necessary)

NOTE: IF YOU HAVE PREVIOUSLY FILED A LAWSUIT AGAINST THE DEBTOR IN STATE OR FEDERAL COURT, YOU MAY ATTACH THE COMPLAINT. IF YOU DID NOT FILE A LAWSUIT OR IF THE COMPLAINT DOES NOT CONTAIN ALL OF THE INFORMATION REQUESTED BELOW, YOU MUST PROVIDE THE INFORMATION BELOW.

a. Who committed the acts of abuse or other wrongful conduct?

b. What is the Position, Title or Relationship to You (if known) (e.g., Priest, Teacher, Coach, etc.) of the abuser or individual who committed these acts?

c. Where did the abuse or other wrongful conduct take place? Please be specific and complete all relevant information that you know, including the City and State, name of the Parish or School (if applicable) and/or the name of any other location.

d. When did the abuse or other wrongful conduct take place?

1. If the abuse or other tortious conduct took place over a period of time (months or years) please state when it started, when it stopped, and how many times it occurred.

2. Please also state your age(s) and your grade(s) in school (if applicable) at the time the abuse or other wrongful conduct took place.

e. What happened (describe what happened):

f. Did you tell anyone about the abuse or other tortious conduct and, if so, who did you tell and when (this would include parents; relatives; friends; the Archdiocese; your parish; attorneys; counselors; and law enforcement authorities)?

PART 4: IMPACT OF COMPLAINT
(Attach additional separate sheets if necessary)

(If you are uncertain how to respond to this Part 4, you may leave this Part 4 blank, but you will be required to complete this Part 4 within thirty (30) days after a written request is made for the information requested in this Part 4)

1. What injuries have occurred to you because of the act or acts of abuse or other wrongful conduct that resulted in the claim (for example, the effect on your education, employment, personal relationships, health, and any physical injuries)?

2. Have you sought counseling or other treatment for your injuries? If so, _____
with whom and when?

3. Amount of Claim as of January 4, 2011: \$ _____

PART 5. ADDITIONAL INFORMATION

1. Settlements: Regardless of whether a complaint was ever filed against any party because of the abuse or other wrongful conduct, have you settled any claim relating to the abuse or other wrongful conduct described in this claim?

Yes No If "Yes", please describe including parties to the settlement, and attach a copy of any settlement agreement.

2. Bankruptcy. Have you ever filed bankruptcy? Yes No If "Yes", please provide the following information:

Name of Case: _____ Court: _____

Date filed: _____ Case No. _____

Chapter: 7 11 12 13 Name of Trustee: _____

Date: _____

Sign and print the name and title, if any, of the Victim/Survivor or other person authorized to file this claim.

Under penalty of perjury, I declare the foregoing statements to be true and correct.

Signature: _____

Print Name: _____

EXHIBIT C

Notice of Bar Dates for Filing of General Creditors' Proofs of Claim

WHD/7838438.1

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

In re:

Case No. 11-20059-svk

ARCHDIOCESE OF MILWAUKEE,

Chapter 11

Debtor.

Hon. Susan V. Kelley

NOTICE OF BAR DATES FOR FILING OF GENERAL CREDITORS

TO ALL PERSONS AND ENTITIES WITH CLAIMS AGAINST THE ARCHDIOCESE OF MILWAUKEE:

PLEASE TAKE NOTICE that on January 4, 2011 (the "Petition Date") the debtor and debtor in possession in the above-captioned case (the "Debtor") filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). The Debtor, its address, case number, proof of claim forms and other relevant information related to this chapter 11 case may be obtained at: www.kccllc.net/ArchMil.

PLEASE TAKE FURTHER NOTICE that on [_____], 2011, the United States Bankruptcy Court for the Eastern District of Wisconsin (the "Court") entered an order (the "Bar Date Order") establishing certain claims bar dates in the Debtor's chapter 11 case. By the Bar Date Order, the Court established **August 1, 2011** as the date by which general creditor claims must be filed (the "General Creditor Bar Date"). Except as described below, the Bar Date Order requires all Entities, including Governmental Units that have or assert any prepetition Claims against the Debtor to file proofs of claim with the Court so that their proofs of claim are received by August 1, 2011. Please note that the terms "Entity," "Governmental Unit" and "Claim" are defined below.

PLEASE TAKE FURTHER NOTICE that for your convenience, enclosed with this notice (the "Bar Date Notice") is a proof of claim form (the "Proof of Claim Form"), which identifies on its face the amount, nature and classification of your Claim(s), if any, listed in the Debtor's schedules of assets and liabilities and statements of financial affairs filed in this case (collectively, the "Schedules"). If this notice does not include a proof of claim form, a proof of claim form may be obtained from the Noticing Agent at www.kccllc.net/archmil.

Daryl L. Diesing
Bruce G. Arnold
Michael E. Gosman
WHYTE HIRSCHBOECK DUDEK S.C.
555 East Wells Street, Suite 1900
Milwaukee, Wisconsin 53202-4894
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Facsimile: (414) 223-5000
Email: ddiesing@whdlaw.com
WHD/7838438.1

KEY DEFINITIONS

- As used in this Notice, the term “Entity” has the meaning given to it in section 101(15) of the Bankruptcy Code, and includes all persons (individuals, partnerships and corporations), estates, trusts, Governmental Units and the United States Trustee.
- As used in this Notice, the term “Governmental Unit” has the meaning given to it in section 101(27) of the Bankruptcy Code and includes the United States; states; commonwealths; districts; territories; municipalities; foreign states; or departments, agencies or instrumentalities of the foregoing.
- As used in this Notice, the term “Claim” shall mean, as to or against the Debtor and in accordance with section 101(5) of the Bankruptcy Code: (i) any right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured or unsecured; or (ii) any right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured or unsecured.

A CLAIMANT SHOULD CONSULT AN ATTORNEY IF THE CLAIMANT HAS ANY QUESTIONS, INCLUDING WHETHER SUCH CLAIMANT MUST FILE A PROOF OF CLAIM. A CLAIMANT MAY ALSO OBTAIN INFORMATION FROM THE DEBTOR BY CALLING 877-609-3995.

I. WHO MUST FILE A PROOF OF CLAIM AND THE APPLICABLE BAR DATES

- A. **The Bar Dates:** The Bar Date Order establishes the following applicable bar dates for filing proofs of claim in this case:
1. **The General Bar Date.** Except as set forth below, pursuant to the Bar Date Order, all Entities holding Claims, including Governmental Units, and Claims filed under section 503(b)(9) of the Bankruptcy Code, against the Debtor (whether secured, unsecured priority, or unsecured nonpriority) that arose prior to or on January 4, 2011, are required to file proofs of claim by the General Bar Date – **August 1, 2011.**
 2. **The Rejection Damages Bar Date.** Any Entity whose Claim arises out of the Court-approved rejection of an executory contract or unexpired lease, in accordance with section 365 of the Bankruptcy Code and pursuant to an order entered prior to the confirmation of a chapter 11 plan in the Debtor’s chapter 11 case, must file a proof of claim on or before the [later of]: (i) the General Bar Date; (ii) the date that is twenty-eight (28) days after entry of an order approving the rejection of an executory contract or unexpired lease pursuant to which the entity asserting the Rejection

Damages Claim is a party. The later of these dates is referred to in this Notice as the "Rejection Damages Bar Date."

B. **Entities That MUST File Proofs of Claims by the General Bar Date:** Subject to the terms described above for holders of Claims subject to the Rejection Bar Date and except as set forth in paragraph F below, the following Entities must file proofs of claim on or before the General Bar Date:

1. any entity or person whose Claim against the Debtor is not listed in the Debtor's Schedules or whose Claim is listed in the Schedules as disputed, contingent or unliquidated and that desires to participate in this Chapter 11 case or share in any distribution in this Chapter 11 case; and
2. any entity or person that believes that its Claim is improperly classified in the Schedules or is listed in an incorrect amount and that desires to have its Claim allowed in a classification or amount other than that identified in the Schedules.

PLEASE NOTE THAT INDIVIDUALS ASSERTING CLAIMS ARISING FROM ABUSE FOR WHICH SUCH INDIVIDUALS BELIEVE THE ARCHDIOCESE OF MILWAUKEE MAY BE LIABLE ARE INSTRUCTED TO FILE A VICTIM/SURVIVOR PROOF OF CLAIM FORM, CONSISTENT WITH THE BAR DATE ORDER AND THE VICTIM/SURVIVOR CLAIM BAR DATE NOTICE. VICTIMS/SURVIVORS MAY OBTAIN COPIES OF THESE FORMS BY CONTACTING THE DEBTOR'S VICTIM ASSISTANCE COORDINATOR BETWEEN THE HOURS OF 9:00 A.M. AND 5:00 P.M. (PREVAILING CENTRAL TIME), MONDAY THROUGH FRIDAY, AT [•], VISITING THE DEBTOR'S NOTICING AGENT'S WEBSITE AT [HTTP://WWW.KCCLLC.NET/ARCHMIL](http://www.kccllc.net/archmil); VISITING THE OFFICE OF THE CLERK OF THE COURT, UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF WISCONSIN, ROOM 126, U.S. COURTHOUSE, 517 EAST WISCONSIN AVENUE, MILWAUKEE, WISCONSIN 53202 DURING REGULAR BUSINESS HOURS, OR FOR A CHARGE ON THE COURT'S WEBSITE ([HTTP://WWW.WIEB.USCOURTS.GOV](http://www.wieb.uscourts.gov)) BY FOLLOWING THE DIRECTIONS FOR ACCESSING THE ECF SYSTEM ON SUCH WEBSITE; OR FOR FREE AT THE NOTICE AGENT'S WEBSITE AT [HTTP://WWW.KCCLLC.NET/ARCHMIL](http://www.kccllc.net/archmil) OR BY VISITING THE DEBTOR'S WEBSITE: ([HTTP://WWW.ARCHMIL.ORG](http://www.archmil.org)).

C. **Entities NOT Required to File Proofs of Claim by the General Bar Date:** The Bar Date Order further provides that the following Entities need not file proofs of claim by the General Bar Date or the Rejection Bar Date, as applicable:

1. any entity or person that has already properly filed a general creditor proof of claim against the Debtor with the Clerk of the Court for the United States Bankruptcy Court for the Eastern District of Wisconsin;
2. any entity or person: (i) whose Claim is listed in the Schedules or any amendments thereto, and (ii) whose Claim is not described therein as

“disputed,” “contingent,” or “unliquidated,” and (iii) who does not dispute the amount or classification of its Claim as set forth in the Schedules;

3. professionals retained by the Debtor or the Committee pursuant to orders of this Court, including Kurtzman Carson Consultants, who assert administrative claims for payment of fees and expenses subject to the Court’s approval pursuant to sections 330, 331(a) and 503(b) of the Bankruptcy Code;
4. any entity or person that asserts an administrative expense claim against the Debtor pursuant to sections 503(b)(1) through (8) of the Bankruptcy Code;
5. any entity or person or entity whose Claim against the Debtor has been allowed by an order of the Court entered on or before the applicable Bar Date; and
6. any entity or person or entity whose Claim has been paid in full.

II. CONSEQUENCES OF FAILURE TO FILE PROOF OF CLAIM

Any Entity that is required to file a proof of claim, but fails to do so by the applicable Bar Date described in this General Creditor Bar Date Notice: (i) may be forever barred from (a) asserting such claim against the Debtor or its estate; (b) voting on any plan of reorganization or of liquidation filed in the Reorganization Case, and (c) participating in any distribution in the Reorganization Case on account of such claim, and that the Debtor need not provide further notices regarding such claim.

If it is unclear from the Schedules whether your Claim is disputed, contingent or unliquidated as to amount or is otherwise properly listed and classified, you must file a proof of claim on or before the applicable Bar Date. Any Entity that relies on the information in the Schedules bears responsibility for determining that its Claim is accurately listed therein. Moreover, Entities who receive individualized proof of claim forms with this General Creditor Bar Date Notice as part of the General Creditor Bar Date Notice Package should verify the accuracy of the amount listed, if any, on such proof of claim form with the amount listed on the Schedules. Any Entity that relies on the amount listed on its individualized proof of claim form bears responsibility for determining that its Claim is accurately listed therein.

III. PROCEDURE FOR FILING PROOFS OF CLAIM BY GENERAL CREDITORS

- A. One original proof of claim must be sent by mail, overnight delivery, courier, or hand delivery to the Court at United States Bankruptcy Court, Eastern District of Wisconsin, 517 East Wisconsin Avenue, Milwaukee, Wisconsin 53202, so as to be received no later than 4:00 p.m. (prevailing Central Time) on the applicable Bar Date, with a copy provided to the Debtor, c/o Whyte Hirschboeck Dudek

S.C., Attn: Daryl L. Diesing, 555 East Wells Street, Suite 1900, Milwaukee, Wisconsin 53202-3819. *Any proof of claim submitted by facsimile or e-mail will not be accepted and will not be deemed filed until the proof of claim is submitted by the method described in the foregoing sentence.* Proofs of claim will be deemed filed only when actually received by the Court. If you wish to receive acknowledgement of the Court's receipt of your proof of claim, you must also submit by the applicable Bar Date and concurrently with submitting your original proof of claim: (i) one additional copy of your original proof of claim; and (ii) a self-addressed, stamped return envelope.

- B Proofs of claim must include all documentation required by Bankruptcy Rules 3001(c) and 3001(d), including an original or a copy of any written document that forms the basis of the Claim or, for secured Claims, evidence that the alleged security interest has been perfected.

IV. RESERVATION OF RIGHTS

The Debtor reserves the right to: (i) dispute, or to assert offsets or defenses against, any filed Claim or any Claim listed or reflected in the Schedules as to nature, amount, liability, classification or otherwise; and (ii) subsequently designate any Claim as disputed, contingent or unliquidated. Nothing contained in this Notice shall preclude the Debtor from objecting to any Claim, whether scheduled or filed, on any grounds.

V. ADDITIONAL INFORMATION

- A. You may be listed as the holder of a Claim against the Debtor in the Schedules. If you hold or assert a Claim that is not listed in the Schedules or if you disagree with the amount or priority of your Claim as listed in the Schedules, or your Claim is listed in the Schedules as contingent, unliquidated, or disputed, you must file a proof of claim. Copies of the Schedules and the Bar Date Order are available for inspection during regular business hours at the office of the Clerk of the Court, United States Bankruptcy Court for the Eastern District of Wisconsin, Room 126 U.S. Courthouse, 517 East Wisconsin Avenue, Milwaukee, Wisconsin 53202. In addition, copies of the Debtor's Schedules and Bar Date Order may be obtained for a charge on the Internet at: the Court's website (<http://www.wieb.uscourts.gov>) by following the directions for accessing the ECF system on such website; or for free at the notice agent's website at <http://www.kccllc.net/ArchMil>, or on the Debtor's website at <http://www.archmil.org>.
- B. Questions concerning the contents of this Notice and requests for proofs of claim should be directed to Debtor at 877-609-3995 between the hours of 9:00 a.m. and 5:00 p.m. (prevailing Central Time), Monday through Friday. **Please note that the Debtor's staff is not permitted to give legal advice. You should consult your own attorney for assistance regarding any other inquiries, such as questions concerning the completion or filing of a proof of claim.**

Dated this ____ day of ____, 2011.

ARCHDIOCESE OF MILWAUKEE
Debtor and Debtor-in-Possession
by its counsel,
Whyte Hirschboeck Dudek S.C.

By: _____
Daryl L. Diesing
State Bar No. 1005793
Bruce G. Arnold
State Bar No. 1002833
Michael E. Gosman
State Bar No. 1078872

P.O. ADDRESS:

555 East Wells Street, Suite 1900
Milwaukee, WI 53202
Telephone: (414) 273-2100
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Email: ddiesing@whdlaw.com
barnold@whdlaw.com
mgosman@whdlaw.com

EXHIBIT D

Notice of Deadline for Filing of Victims/Survivors Proofs of Claim

WHD/7838449.1

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF WISCONSIN

In re:

Case No. 11-20059-svk

ARCHDIOCESE OF MILWAUKEE,

Chapter 11

Debtor.

Hon. Susan V. Kelley

NOTICE OF DEADLINE FOR FILING VICTIM/SURVIVOR PROOFS OF CLAIM

**THIS IS AN IMPORTANT NOTICE
YOUR RIGHTS MIGHT BE AFFECTED**

**NOTE: SEPTEMBER 15, 2011, AT 4:00 P.M. PREVAILING CENTRAL
TIME IS THE LAST DATE TO FILE A VICTIM/SURVIVOR PROOF OF CLAIM**

TO ALL PERSONS WITH KNOWN OR POTENTIAL CLAIMS ARISING FROM ABUSE
FOR WHICH SUCH PERSONS BELIEVE THE ARCHDIOCESE OF MILWAUKEE IS
LIABLE:

On January 4, 2011 (the "Petition Date"), the Archdiocese of Milwaukee (the "Archdiocese" or the "Debtor") filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"). The Debtor, its address, case number, proof of claim forms and other relevant information related to this Chapter 11 case may be obtained at: (<http://www.kccllc.net/ArchMil>). Numerous individuals (each a "Victim/Survivor" and collectively, the "Victims/Survivors") have asserted abuse claims against the Debtor. Any person who believes that he or she has or may have a claim arising from abuse or for other wrongful conduct for which the person believes the Debtor may be liable (each a "Victim/Survivor Claim," and collectively, the "Victims/Survivors Claims") should carefully read this notice.

**YOU MAY WISH TO CONSULT AN ATTORNEY REGARDING THIS MATTER AND
MAY ALSO OBTAIN INFORMATION FROM THE DEBTOR'S VICTIM ASSISTANCE
COORDINATOR BY CALLING [•]**

Daryl L. Diesing
Bruce G. Arnold
Michael E. Gosman
WHYTE HIRSCHBOECK DUDEK S.C.
555 East Wells Street, Suite 1900
Milwaukee, Wisconsin 53202-4894
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Facsimile: (414) 223-5000
Email: ddiesing@whdlaw.com
WHD/7838449.1

FILING DEADLINE

The United States Bankruptcy Court for the Eastern District of Wisconsin (the “Court”) has entered an order establishing **September 15, 2011 at 4:00 p.m.** (prevailing Central Time) as the last date and time for each Victim/Survivor to file a proof of claim form (the “Victim/Survivor Bar Date”). The Victim/Survivor Bar Date and the procedures set forth below for filing proofs of claim apply to all Victim/Survivor Claims against the Debtor based upon events occurring prior to January 4, 2011.

WHO MUST FILE

If you believe that you have a Victim/Survivor Claim, you **must** file a **Victim/Survivor Proof of Claim Form** to maintain and/or preserve any claims that you have against the Debtor. **Even if you have already filed a lawsuit against the Debtor prior to January 4, 2011, you must still file a Victim/Survivor Proof of Claim Form to maintain and/or preserve your rights in the Debtor’s chapter 11 case.**

WHO SHOULD NOT FILE

You should **not** file a Victim/Survivor Proof of Claim Form if:

- Your Victim/Survivor Claim has already been paid in full;
- You hold a Victim/Survivor Claim that has been allowed by an order of the Bankruptcy Court on or before the Victims/Survivors Bar Date;
- You hold a Victim/Survivor Claim under a mediation settlement and your only claim is for the unpaid amount stated in the settlement agreement; or
- If you do not have a claim against the Debtor.

PROCEDURES FOR FILING A VICTIM/SURVIVOR PROOF OF CLAIM FORM

To file a Victim/Survivor Proof of Claim Form, you must take the following steps:

- Fill out the Victim/Survivor Proof of Claim Form.
- For additional copies of the Victim/Survivor Proof of Claim Form: photocopy the Victim/Survivor Proof of Claim Form, contact the Debtor's Victim Assistance Coordinator between the hours of 9:00 a.m. and 5:00 p.m. (prevailing Central Time), Monday through Friday, at [•], visit the Debtor's Noticing Agent’s website at <http://www.kccllc.net/ArchMil>; visit the office of the Clerk of the Court, United States Bankruptcy Court for the Eastern District of Wisconsin, Room 126, U.S. Courthouse, 517 East Wisconsin Avenue, Milwaukee, Wisconsin 53202 during regular business hours, or for a charge on the Court’s website (<http://www.wieb.uscourts.gov>) by following the directions for accessing the ECF

system on such website; or for free at the notice agent's website at <http://www.kccllc.net/ArchMil> or visiting the Debtor's website: (<http://www.archmil.org>).

- **Please note that the Debtor's staff is not permitted to give legal advice. You should consult your own attorney for assistance regarding any other inquiries, such as questions concerning the completion or filing of a proof of claim.**
- **Do not file or mail the Victim/Survivor Proof of Claim Form with or to the Court. Instead, all Victim/Survivor Proof of Claim Forms should be sent to the Debtor at the address set forth below.**
- Return the completed Victim/Survivor Proof of Claim Form to the Debtor at the address set forth below no later than **September 15, 2011 at 4:00 p.m. (prevailing Central Time)**. Victim/Survivor Proof of Claim Forms will be deemed timely filed only when they are actually received by the Debtor no later than **September 15, 2011 at 4:00 p.m. (prevailing Central Time)**.
- **Please note that Victim/Survivor Proof of Claim Forms submitted by facsimile, telecopy or electronic mail transmission will not be accepted and will not be deemed filed.** If you are returning a Victim/Survivor Proof of Claim Form by mail, allow sufficient mailing time so that the Victim/Survivor Proof of Claim Form is received on or before **September 15, 2011 at 4:00 p.m. (prevailing Central Time)**. Victim/Survivor Proof of Claim Forms that are postmarked before that date; *i.e.*, the Victim/Survivor Claim Bar Date, but which are received by the Debtor after the Victim/Survivor Claim Bar Date will be considered late.
- All Victim/Survivor Proof of Claim Forms, whether sent by U.S. mail, overnight delivery, courier service, or in person should be delivered to the following address, between the hours of 9:00 a.m. and 5:00 p.m. (prevailing Central Time), Monday through Friday:

Archdiocese of Milwaukee
c/o Whyte Hirschboeck Dudek S.C.
Attn: Daryl L. Diesing
555 East Wells Street, Suite 1900
Milwaukee, Wisconsin 53202

CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM

The deadline for filing a Victim/Survivor Proof of Claim Form is **September 15, 2011 at 4:00 p.m. (prevailing Central Time)**. Any person who is a Victim/Survivor Claim and does not file a Victim/Survivor Proof of Claim by that date may NOT be treated as a creditor for voting or distribution purposes under any plan of reorganization and such claim will be subject to

discharge. Failure to file a Victim/Survivor Claim may prevent such person from voting on any plan of reorganization in this case. Further, if such Victim/Survivor Claim is discharged, the Victim/Survivor Claimant may be forever barred and prevented from asserting his or her Victim/Survivor Claim against the Debtor or its property, and may not receive any payment or distribution in connection with such Victim/Survivor Claim.

CONFIDENTIALITY

Pursuant to the Bar Date Order, Victim/Survivor Proofs of Claim will remain confidential in this bankruptcy case, unless you elect otherwise in Part 1 of the Victim/Survivor Proof of Claim Form. Therefore, the Victim/Survivor Proof of Claim Form that you file will not be available to the general public, but will be kept confidential, except that in addition to the Debtor and Debtor's counsel, information will be provided to the Committee's counsel, and upon request, to the following parties and to any additional parties the Court directs but only after each party agrees to keep the information provided in the Victim/Survivor Proof of Claim Forms confidential:

- (a) Insurance companies that provided insurance that may cover the claims described in the Victim/Survivor Proof of Claim Forms.
- (b) Any future claims representative appointed under a plan of reorganization.
- (c) Any special arbitrator/claims reviewer appointed to review and resolve the claims of Victims/Survivors.
- (d) Any settlement trustee appointed to administer payments to Victims/Survivors.
- (e) Members of the Committee and their personal counsel (after the Victim/Survivor Proof of Claim Form has been redacted to hide the Victim/Survivor's name, address and any other information identified in Part 2(A) of the Victim/Survivor Proof of Claim Form).
- (f) Such other persons as the Court determines should have the information in order to evaluate Victim/Survivor Claims.

Dated this ____ day of ____, 2011.

ARCHDIOCESE OF MILWAUKEE
Debtor and Debtor-in-Possession
by its counsel,
Whyte Hirschboeck Dudek S.C.

By: _____

Daryl L. Diesing
State Bar No. 1005793
Bruce G. Arnold
State Bar No. 1002833
Michael E. Gosman
State Bar No. 1078872

P.O. ADDRESS:

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barnold@whdlaw.com
mgosman@whdlaw.com

EXHIBIT E

WHD/7838476.1

The following diocesan priests of the Archdiocese of Milwaukee have been (or would be if they were still alive) restricted from all priestly ministries due to substantiated reports of sexual abuse of a minor:

Raymond A. Adamsky, Fully Restricted from Priestly Ministry
James L. Arimond, Laicized
Ronald J. Bandle, Deceased
James W. Beck, Left Priestly Ministry
Franklyn W. Becker, Laicized
Michael C. Benham, Laicized
Frederick J. Bistricky, Deceased
Daniel A. Budzynski, Laicized
Peter A. Burns, Laicized
S. Joseph Collova, Excommunicated
Andrew P. Doyle, Laicized (Deceased)
William J. Effinger, Deceased
Ronald Engel, Fully Restricted from Priestly Ministry
George A. Etzel, Deceased
William J. Farrell, Deceased
James M. Flynt, Laicized
James M. Godin, Laicized
Edmund H. Haen, Deceased
David J. Hanser, Laicized
Harold A. Herbst, Deceased
George S. Hopf, Deceased
James N. Jablonowski, Fully Restricted from Priestly Ministry
Marvin T. Knighton, Fully Restricted from Priestly Ministry
John T. Knotek, Deceased
Michael J. Krejci, Fully Restricted from Priestly Ministry
Eugene T. Kreuzer, Deceased
Oswald G. Krusing, Deceased
Jerome E. Lanser, Fully Restricted from Priestly Ministry
Eldred B. Lesniewski, Deceased
Daniel J. Massie, Laicized
Lawrence C. Murphy, Deceased
Michael T. Neuberger, Dismissed from clerical state (case in appeal)
Richard W. Nichols, Deceased
George A. Nuedling, Deceased
John A. O'Brien, Laicized
Donald A. Peters, Laicized
Roger W. Schneider, Laicized
Clarence J. Schouten, Deceased
Vincent A. Silvestri, Deceased
Thomas A. Trepanier, Fully Restricted from Priestly Ministry
Jerome A. Wagner, Laicized
John C. Wagner, Fully Restricted from Priestly Ministry

Charles W. Walter, Fully Restricted from Priestly Ministry
Siegfried F. Widera, Deceased

WHD/7838476.1

EXHIBIT F

WHD/7838513.1

In re: Archdiocese of Milwaukee
Case No. 11-20059

**YOU MAY HAVE A CLAIM AGAINST
THE ARCHDIOCESE OF MILWAUKEE**

On January 4, 2011, the Archdiocese of Milwaukee (the "Debtor") filed for protection under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Eastern District of Wisconsin (the "Bankruptcy Court").

**THE LAST DAY TO FILE AN ABUSE CLAIM OR OTHER CLAIM
ALLEGING WRONGFUL CONDUCT AGAINST THE DEBTOR IS
SEPTEMBER 15, 2011**

AT 4:00 p.m. (PREVAILING CENTRAL TIME).

**IF YOU WERE ABUSED BY ANY MEMBER OF THE CLERGY OR ANY
OTHER PERSON CONNECTED WITH THE ARCHDIOCESE OF
MILWAUKEE, YOU MUST FILE A CLAIM BY SEPTEMBER 15, 2011 AT
4:00 p.m. (PREVAILING CENTRAL TIME).**

For more information, including a complete list of all parishes and schools within the geographic territory of the Archdiocese of Milwaukee, or to receive a proof of claim form and associated documents, please (1) visit the Debtor's website at <http://www.archmil.org>; (2) visit the Claims Noticing Agent's designated website at <http://www.kccllc.net/ArchMil>; (3) call the Debtor's Victim Assistance Coordinator at [•]; or (4) write to the Debtor c/o Whyte Hirschboeck Dudek S.C., Attn: Daryl L. Diesing, 555 East Wells Street, Suite 1900, Milwaukee, Wisconsin 53202.

EXHIBIT G

CONFIDENTIALITY AGREEMENT

I, _____, state the following:

1. I am aware that pursuant to the order of the United States Bankruptcy Court for the Eastern District Court of Wisconsin in case No. 11-20059 (the "Bankruptcy Case") [Docket No. ____], I cannot have access to any Victims/Survivors Proofs of Claims and information contained therein unless I enter into this Confidentiality Agreement (a "Confidentiality Agreement").

2. I understand that the information contained on the Victims/Survivors Proofs of Claim, including but not limited to the names and other personal identification information of a Victim/Survivor or alleged abuser, is confidential (the "Confidential Information") and I will not provide any Victims/Survivors Proofs of Claim forms to any individual, or share any Confidential Information, with any individual that has not entered into a Confidentiality Agreement concerning the Victims/Survivors Proofs of Claim.

3. I shall use or cause the Confidential Information only to assist me in performing my functions in the Bankruptcy Case and in a manner consistent with the terms and conditions of this Confidentiality Agreement. At no time shall I use the Confidential Information for the benefit of myself or any other third person. Nor shall I use the Confidential Information for any other purpose or proceeding, including but not limited to, any other legal proceedings of any nature, for purposes of evaluation or compiling demographic or statistical information about victim abuse claims against the Archdiocese or any other organization, or for purposes of evaluating or compiling demographic or statistical information about victim abuse claim settlements paid by the Archdiocese or any other organization.

4. In the event that I am subpoenaed or otherwise required to give testimony regarding any Confidential Information, I agree to immediately notify the Archdiocese, through its counsel, and to assist the Archdiocese and its counsel in preventing the disclosure of any Confidential Information. The notice required by this section shall be provided to:

Daryl L. Diesing, Bruce G. Arnold and Michael E. Gosman
Whyte Hirschboeck Dudek S.C.
555 East Wells Street, Suite 1900
Milwaukee, WI 53202
414-978-5523
ddiesing@whdlaw.com
barnold@whdlaw.com
mgosman@whdlaw.com

5. This Confidentiality Agreement creates a continuing and permanent obligation to maintain confidentiality and shall not terminate at the conclusion of the Bankruptcy Case.

6. In the event I breach this Confidentiality Agreement, the Archdiocese shall be entitled, in addition to whatever other remedies are or might be available at law or in equity, to compel specific performance by me or to obtain injunctive relief preventing any further breach, including, without limitation, immediate return of all Confidential Information, and including all reasonable attorneys fees and costs incurred as a result of any breach, and I shall not oppose such relief.

7. I further understand that any breach of this Confidentiality Agreement may give rise to sanctions for contempt of court, and to separate legal and equitable recourse by the adversely affected party. I further consent to the exercise of personal jurisdiction by the United States Bankruptcy Court for the Eastern District of Wisconsin and waive any objection as to venue in connection with any effort to enforce this Confidentiality Agreement.

I declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct and that this Confidentiality Agreement is executed on the _____ day of _____, 2011 at _____ in _____.

Signature

Printed Name

Employer