

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Baltimore Division)**

In re:

Case No. 23-16969

Roman Catholic Archbishop of Baltimore,

Chapter 11

Debtor.

Judge Michelle M. Harner

**THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' EXPEDITED
MOTION FOR (I) RELIEF FROM THE AUTOMATIC STAY PURSUANT TO
11 U.S.C. § 362(d)(1) AND (II) AN ORDER ESTABLISHING THE DATE ON
WHICH PROOFS OF CLAIM INITIATED OR COMMENCED A
PROCEEDING UNDER MARYLAND'S CVA**

The Official Committee of Unsecured Creditors (the “Committee”) appointed in the bankruptcy case of the Roman Catholic Archbishop of Baltimore (the “Debtor”), by and through their undersigned counsel, hereby moves for relief from the automatic stay for cause pursuant to 11 U.S.C. § 362(d) and Bankruptcy Rule 4001(a) and for an order clarifying the timing and effect of the submission of a proof of claim in this case pursuant to 11 U.S.C. §§ 105(a), 108(c), 502, and Bankruptcy Rules 3001, 3003(c), and 5005. The Committee respectfully requests that the Court enter an order: (1) modifying the automatic stay to allow the Survivors, hereinafter defined, to commence and continue civil litigation against the Debtor and/or its Catholic Affiliates, as hereinafter defined; and (2) for purposes of the CVA Amendment, hereinafter defined, scheduled to take effect on June 1, 2025, determining that Survivor Proofs of Claim filed in this bankruptcy proceeding constitute the filing of an action by each claimant, against (i) the Debtor, (ii) all entities named in Survivor Proofs of Claim, hereinafter defined, and/or (iii) all other entities alleged to be protected by the automatic stay. In support of its Motion, the Committee respectfully states as follows:

PRELIMINARY STATEMENT

1. Recent developments in Maryland state law have created unprecedented urgency for Survivors.

2. The Maryland legislature, through House Bill 1378 (the “CVA Amendment”) passed on April 3, 2025, appears to have fundamentally altered the compensation framework for child sexual abuse victims by, among other things, purporting to significantly reduce the maximum recovery available for Survivors depending on whether they satisfy certain procedural mechanisms on or before May 31, 2025.

3. Specifically, the text of the CVA Amendment modifies Maryland Code Courts and Judicial Proceedings Article § 5-117(c) to introduce a new mechanism which changes the available amount of noneconomic damages such that certain claims in “an action filed on or before May 31, 2025” is \$1,500,000 but the available amount of noneconomic damages in certain claims in “an action filed on or after June 1, 2025” is \$700,000.

4. This dramatic legislative shift creates significant procedural obstacles for Survivors in this bankruptcy proceeding because of the automatic stay and this Court’s *Second Interim Order, Pursuant to Sections 105(a) and 362 of the Bankruptcy Code, Extending the Automatic Stay to Certain Related Entities* (the “Stay Extension Order”), Dkt. 173, which would arguably prevent claimants who submitted Survivor Proofs of Claim from securing treatment as a claimant who filed an action prior to the CVA Amendment’s June 1, 2025 effective date to the extent they cannot assert those claims in “an action filed on or before May 31, 2025.”

5. Despite Survivors' continued participation in mediation efforts with the Debtor, its Catholic Affiliates,¹ and their insurers, these legislative changes now threaten to substantially diminish Survivors' potential recovery against both the Debtor and non-debtors protected by the Stay Extension Order. The automatic stay compounds these challenges by preventing the assertion of an action containing those claims prior to May 31, 2025.

6. Survivors deserve clarity on whether they have already preserved, or need to take further action to preserve, their rights as implicated by the CVA Amendment. This Court should provide that clarity by entering an order deeming all proofs of claim submitted in this case to constitute "claims" asserted against each and every entity identified or implicated in the proofs of claim as "an action filed on or before May 31, 2025", as that language is used in § 5-117(c)(1) of the CVA Amendment.

7. If the Court does not find that the filing of a Proof of Claim in this case constitutes the filing an action for purposes of the CVA Amendment's June 1, 2025 deadline, not just as to the Debtor, but as to every entity identified in the Proofs of Claim who are protected by the Stay Extension Order, then Survivors must be permitted to preserve their rights and file actions outside of the bankruptcy court prior to May 31, 2025.

BACKGROUND

8. In April 2023, the Maryland General Assembly enacted the Child Victims Act of 2023 (the "CVA"), which Governor Moore approved on April 11, 2023, and which became effective on October 1, 2023, effectively removing the deadline for survivors of child sexual

¹ "Catholic Affiliates" means the entities identified as "Related Entities" in the Debtor's Informational Brief of The Roman Catholic Archbishop of Baltimore, Dkt. No. 5.

assault (the “Survivors”) to file civil law claims against individuals and institutions who may be liable for child sexual assault.

9. On September 29, 2023 (the “Petition Date”),² the Debtor filed a voluntary petition with this Court under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”). The Debtor is operating as a debtor in possession pursuant to 11 U.S.C. §§ 1107 and 1108.

10. As a result of this chapter 11 filing, any effort by any individual claimant to file or otherwise initiate an action against the Debtor was automatically stayed prior to the effective date of the CVA pursuant to 11 U.S.C. § 362.

11. In addition, the Court entered the Stay Extension Order protecting certain Catholic Affiliates from any effort to file or otherwise initiate an action related to a claim under the CVA.

12. On January 16, 2024, the Court entered its *Order (I) Establishing Deadlines for Filing Proofs of Claim; (II) Approving Sexual Abuse Claim Supplement; (III) Approving Form and Manner of Notice; and (IV) Approving Confidentiality Procedures*, Dkt. 316 (the “Bar Date Order”), setting procedures, deadlines, and other guidance on the filing of claims for sexual abuse against the Debtor and other Catholic Affiliates (“Survivor Proofs of Claim”).

13. After reviewing the Survivor Proofs of Claim, the Committee has determined that the Catholic Affiliates listed on **Exhibit A** (“Additional Catholic Defendants”), face co-liability with the Debtor as set forth in the Survivor Proofs of Claim.

14. In addition, and pursuant to the procedures set out in the Stay Extension Order, the Debtor has confirmed to the Committee and/or Survivor attorneys that the Stay Extension Order should not apply to the entities listed on **Exhibit B** (“Non-AOB Defendants”).

² Dkt. No. 1.

15. For the avoidance of doubt, the Committee believes the Debtor may assert the Stay Extension Order further protects the entities listed on Exhibit C (“Other Catholic Affiliates”), who the Committee has not necessarily determined have been implicated by allegations contained in the Survivor Proofs of Claim, but are nonetheless alleged to be protected by the Stay Extension Order.

16. In the years preceding the Petition Date, the Maryland Office of the Attorney General conducted an investigation and issued a report in April 2023, stating over six hundred children were known at that time to have been abused by at least 156 priests, teachers, lay-employees, and/or other individuals employed, supervised, or otherwise associated with the Debtor and its Catholic Affiliates.

17. The CVA was passed with the intention of holding organizations, like the Debtor, responsible for the damages they caused Survivors. The CVA established differential compensation caps based on the type of institution involved: \$1.5 million for claims against private institutions (including churches and private schools) and \$890,000 for claims against public institutions, with these limits applied on a “per incident or occurrence” basis against each defendant named in the suit.

18. On April 3, 2025, the Maryland General Assembly passed House Bill 1378, the CVA Amendment, substantially modifying the CVA’s compensation structure for “injuries arising from a claim or claims of child sexual abuse *if the action is filed* on or after June 1, 2025...”³

19. For claims asserted in an action filed on or after June 1, 2025, the CVA Amendment reduces the maximum recoverable damages from \$1.5 million to \$700,000 for claims against

³ Maryland General Assembly, Civil Actions – Child Sexual Abuse, <https://mgaleg.maryland.gov/mgawebsite/Legislation/Details/hb1378?ys=2025RS> (last accessed April 10, 2025).

private institutions and individuals (including churches, parishes, and private schools, like the Debtor and its Catholic Affiliates).

20. The CVA Amendment also removes language providing that the cap applies for injuries arising from “an incident or occurrence” and replaces that language so that the cap applies for injuries arising from “a claim or claims.”

21. Thus, the CVA Amendment appears to purport to limit the total recovery available to Survivors suffering from multiple instances of abuse at the hands of the Debtor and/or its Catholic Affiliates to a single cap per defendant instead of a cap for each incident or occurrence of abuse alleged against a defendant.

22. The Debtor’s unsecured creditors are overwhelmingly comprised of Survivors of sexual abuse with claims against the Debtor and the Catholic Affiliates.⁴ The Survivors are among the more than 1,000 individuals who have filed Survivor Proofs of Claim in this Chapter 11 Bankruptcy alleging that the Debtor is liable for claims arising from child sexual assault and/or other sexual abuse encompassed by the CVA.

23. The urgency of this situation cannot be overstated, as these legislative changes will take effect on June 1, 2025, leaving Survivors little more than one month *from today* to preserve their rights. The CVA Amendment unilaterally imposes substantial and dangerous legal uncertainty in its failure to state whether Survivor Proofs of Claim filed prior to May 31, 2025 in a bankruptcy case that effectively precluded Survivors from filing tort actions qualify as claims in “an action filed on or before May 31, 2025” for purposes of the new language in the CVA Amendment.

⁴ See, e.g., Schedule E/F, Dkt. No. 146 at 47-53; Informational Brief, Dkt. No. 5 at 2-3.

24. Only by a clarifying order from this Court or the filing of a formal complaint in state court before June 1, 2025, can Survivors ensure that their claims will not face a devastating reduction in their potential recovery (from \$1.5 million per incident or occurrence to \$700,000 per claim).

25. The magnitude of effort needed to prepare and file more than 1,000 lawsuits in order to preserve Survivors' rights under the terms of the CVA Amendment is self-evident. Any delay in action, with less than fifty (50) days to prepare and file, will substantially prejudice Survivors, most especially the sixty (60) pro se Survivors in this case – who likely are not even aware of this issue or the potential need to act.

26. The Survivors have been placed in the predicament described in this Motion through no fault of their own. They have diligently pursued and enforced their rights through the course of this bankruptcy case and have participated in good faith throughout the process. As the Court is well aware, this bankruptcy process was unilaterally selected by the Debtor on the eve of the original CVA's effective date, effectively forcing Survivors to comply with deadlines to which they never consented and effectively precluding them from doing so through the very procedural vehicles contemplated by the statutory language of the CVA Amendment.

27. In light of the CVA Amendment, Survivors, by and through the Committee, seek an order clarifying how this bankruptcy case has impacted their rights against Debtor and its Catholic Affiliates, for child sexual abuse claims. The Committee asks the Court to take immediate action to allow Survivors to respond to the shifting legislative landscape in advance of the June 1, 2025 effective date for the CVA Amendment.

JURISDICTION

28. Jurisdiction in this Court is proper pursuant to 28 U.S.C. §§ 157 and 1334 and *Standing Order* 2012-05 from the United States District Court for the District of Maryland. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

29. Venue in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

30. The statutory bases for the relief requested herein are Bankruptcy Code sections 105(a), 108(c), 502, and Bankruptcy Rules 3001, 3003(c), 4001, 5005, and Local Rule 4001-1.

RELIEF REQUESTED

31. The Committee respectfully requests an order: (1) modifying the automatic stay to allow the Survivors to file complaints in non-bankruptcy civil actions against the Debtor and its Catholic Affiliates; and/or (2) determining that Survivor Proofs of Claim filed in this bankruptcy proceeding constitute the filing of claims in “an action filed on or before May 31, 2025” for purposes of the CVA Amendment, thereby preserving Survivors’ rights to recovery as of the time they filed their Survivor Claims.

ARGUMENT

I. LEGAL STANDARD FOR STAY RELIEF

32. Bankruptcy Code Section 362(a) provides for a stay of, among other things:

(1) the commencement or continuation, including the issuance or employment of process, of a judicial, administrative, or other action or proceeding against the debtor that was or could have been commenced before the commencement of the case under this title, or to recover a claim against the debtor that arose before the commencement of the case under this title

* * *

(3) any act to obtain possession of property of the estate or of property from the estate or to exercise control over property of the estate

* * *

(6) any act to collect, assess, or recover a claim against the debtor that arose before the commencement of the case under this title . . .⁵

33. The Court may grant relief from the automatic stay for “cause.” 11 U.S.C. § 362(d)(1). The burden of proof is not on the movant to establish cause, but rather the burden rests with those opposing relief.⁶

34. Courts have broad discretion to lift the automatic stay for “cause” under § 362(d)(1), as this term is undefined in the Bankruptcy Code, requiring case-specific analysis.⁷ “[T]he relief mandated by § 362(d) may include “terminating, annulling, modifying, or conditioning” the automatic stay imposed by § 362(a).”⁸ To determine whether cause exists, the court must balance the “potential prejudice to the bankruptcy debtor’s estate against the hardship that will be incurred by the person seeking relief from the automatic stay if relief is granted.”⁹

35. The Fourth Circuit’s decision in *Robbins* provides three factors for the Court to consider in deciding whether to lift the automatic stay so that the parties may continue with pre-bankruptcy litigation: (1) whether the issues in the pending litigation involve only state law, so the expertise of the bankruptcy court is unnecessary; (2) whether modifying the stay will promote judicial economy and whether there would be greater interference with the bankruptcy case if the stay were not lifted because matters would have to be litigated in bankruptcy court; and (3) whether

⁵ 11 U.S.C. § 362(a).

⁶ 11 U.S.C. 362(g); see *In re Bird*, Case No. 21-11271-TJC, 2022 WL 829105, at *2 (Bankr. D. Md. Feb. 18, 2022).

⁷ *In re Robbins*, 964 F.2d 342, 345 (4th Cir. 1992).

⁸ *In re McPherson*, 630 B.R. 160, 166 (Bankr. D. Md. 2021).

⁹ *Robbins*, 964 F.2d at 345.

the estate can be protected properly by a requirement that creditors seek enforcement of any judgment through the bankruptcy court.¹⁰

36. In articulating the *Robbins* factors, the Fourth Circuit relied heavily on the legislative history of section 362:

[I]t will often be more appropriate to permit proceedings to continue in their place of origin, when no great prejudice to the bankruptcy estate would result, in order to leave the parties to their chosen forum and to relieve the bankruptcy court from many duties that may be handled elsewhere.¹¹

37. Thus, the judicial analysis requires carefully weighing the estate's interests against both the collective creditor body's concerns and the potential prejudice a movant might suffer if denied the opportunity to pursue their claims.¹²

II. CAUSE EXISTS TO MODIFY THE STAY

38. The detrimental impact on Survivors by a bankruptcy filing is particularly pronounced given Maryland's commitment to child protection and the legislature's clear intent, evidenced by the Child Victims Act, to empower abuse victims with meaningful judicial remedies in state courts. The United States Supreme Court has recognized that "sexual abuse of a child is a most serious crime and an act repugnant to the moral instincts of a decent people."¹³ Within the context of childhood sexual abuse, courts have acknowledged that "there can be no real dispute that the controversy over the misconduct of priests, as well as the Church's responsibility for the misconduct and its alleged cover-up, is a 'public controversy.'"¹⁴

¹⁰ *See id.*

¹¹ 964 F.2d at 345 (citing to S. Rep. No. 989, 95th Cong., 2d Sess. 50 (1978), reprinted in 1978 U.S.C.C.A.N. 5787, 5836 and 2 Collier on Bankruptcy § 362.07[3], at 362-71. (15th ed. 1991) ("the liquidation of a claim may be more conveniently and speedily determined in another forum").

¹² *See In re McPherson*, 630 B.R. at 178.

¹³ *Ashcroft v. Free Speech Coal.*, 535 U.S. 234, 244 (2002).

¹⁴ *New Life Ctr., Inc. v. Fessio*, 2000 WL 1157800, at *4 (4th Cir. Aug. 16, 2000).

39. Speaking to “the expertise of the bankruptcy court,” the Committee does not underestimate the expertise of this Court and its ability to get up to speed on the state-law issues involved with claims asserted under the CVA.

40. The Committee, however, respectfully submits that Maryland state court would be the appropriate forum to adjudicate the merits of Survivor Proofs of Claim since these actions exclusively involve Maryland state law.

41. This Court has previously found that “when issues involve only state law ... the expertise of the bankruptcy court is not necessary.”¹⁵

42. Like all personal injury claims, sexual abuse claims are, as a matter of Congress’s clear statutory direction, not matters for the bankruptcy court to litigate on their merits. *See* 28 U.S.C. § 157(b)(2)(B), (O), (5).

43. The third *Robbins* factor can be easily dealt with because Survivors do not seek to enforce any judgments in their non-bankruptcy actions against the Debtor. The Committee agrees that any such actions to enforce a judgment should be stayed and the Court should require Survivors to come back to this Court to assert any liquidated claim(s) against the Debtor, Additional Catholic Defendants, and/or Additional Catholic Entities, so long as they desire to participate in this chapter 11 case in good faith.

III. THE FILING OF A SURVIVOR PROOF OF CLAIM IS THE FILING OF AN ACTION FOR PURPOSES OF THE CVA AMENDMENT

44. The CVA Amendment requires an action to be filed, but the amendment itself does not define “action.”

¹⁵ *In re Nims*, 2011 WL 1402771 at *4 (Bankr. D. Md. 2011).

45. Maryland Rules have defined action, however, as “collectively all the steps by which a party seeks to enforce any right in a court.” Md. Rule 1-202(a).

46. A bankruptcy case aggregates individual actions, “many of which would exist as stand-alone lawsuits but for the bankrupt status of the debtor.”¹⁶ The bankruptcy claims process allows for the resolution of claims “without the formalities of a complaint, answer, affidavits, and summary judgment, which might arise in the context of a federal civil proceeding.”¹⁷ So is the case here—but for the Debtor’s status as a debtor in bankruptcy, Survivor Proofs of Claim would be proceeding on a formal basis in Maryland courts, and therefore claims asserted in this bankruptcy constitute an “action” under Maryland law.

47. This is why bankruptcy courts unequivocally state that the filing of a proof of claim is the equivalent of the filing of a state court action on that claim. “A proof of claim is the means by which a creditor presents and demands payment of its claim in a bankruptcy case. Thus, filing a proof of claim initiates an action within the common legal meaning of that term.”¹⁸ “[T]he proofs of claim forms lay out each claimant’s allegation ... and serve as the functional equivalent to the complaint in the underlying action.”¹⁹

¹⁶ *LVNV Funding, LLC v. Harling*, 852 F.3d 367, 370–71 (4th Cir. 2017), *as amended* (Apr. 6, 2017).

¹⁷ *In re Landbank Eq. Corp.*, 973 F.2d 265, 269 (4th Cir. 1992).

¹⁸ *In re Moran*, No. 10-03696, 2012 WL 6645025, at *3 (Bankr. D. Haw. Dec. 20, 2012).

¹⁹ *Contl. W. Ins. Co. v. Colony Ins. Co.*, 69 F. Supp. 3d 1075, 1082 (D. Colo. 2014).

48. This is not a novel legal issue and has been applied by courts for almost a century.²⁰ In multiple contexts, courts, including non-bankruptcy courts, regularly recognize that filing a proof of claim is functionally the same as the filing of a complaint in civil court.²¹

49. Similarly, courts have generally agreed that proofs of claim are considered “formal pleadings” under the Fair Debt Collection Practices Act (the “FDCPA”) and are the equivalent of “legal pleading[s] filed either in a civil action or beginning one.”²²

50. This is also the case because, as the Supreme Court has already determined, “allowed proofs of claim are equivalent to a final judgment, and thus, a predicate for res judicata.”²³

51. Accordingly, Survivor Proofs of Claim are necessarily equivalent to an action under Maryland’s definition of an action.

52. It should also be indisputable that Survivors have given sufficient notice to the Debtor, Catholic Affiliates, and their insurers of the existence of their claims by filing Survivor

²⁰ See, e.g., *In re Becker's Est.*, 19 N.Y.S.2d 743, 744 (Sur. 1940) (“The filing [of a proof of claim] is equivalent to the commencement of an action or proceeding for the collection of the debt.”); *In re McGowan's Est.*, 22 N.Y.S.2d 224, 225 (Sur. 1940) (“The service of such proof of claim tolled the running of the statute and was the equivalent of the commencement of a special proceeding or action.”).

²¹ *Townsend v. Quantum3 Group, LLC*, 535 B.R. 415, 422 (M.D. Fla. 2015) (collecting cases). See also, *In re Cerrato*, 504 B.R. 23, 38 (Bankr. E.D.N.Y. 2014) (“The filing of a proof of claim is equivalent to the filing of a complaint in a civil action, and an objection to a claim is analogous to an answer.”); *In re Brosio*, 505 B.R. 903, 912 (9th Cir. BAP 2014) (“The filing of a proof of claim is analogous to filing a complaint in the bankruptcy case.”); *O'Neill v. Cont'l Airlines, Inc. (In re Cont'l Airlines)*, 928 F.2d 127, 129 (5th Cir. 1991) (“[T]he filing of a proof of claim is analogous to the filing of a complaint in a civil action, with the bankrupt's objection the same as the answer.”); *Nortex Trading Corp. v. Newfield*, 311 F.2d 163, 164 (2d Cir. 1962) (“The filing by Nortex of its proof of claim is analogous to the commencement of an action within the bankruptcy proceeding.”).

²² *In re Brimpage*, 523 B.R. 134, 141-42 (Bankr. N.D. Ill. 2015). See also *Bank of New York Mellon v. Luria*, 171 N.Y.S.3d 807, 817-19 (N.Y. Sup. Ct. 2022) (distinguishing a communication letter from a proof of claim as a formal pleading); *In re Brimpage*, 523 B.R. 134, 138 (Bankr. N.D. Ill. 2015) (“[T]he filing of a proof of claim is merely the bankruptcy analog of filing a complaint or sending a demand letter to recover on a debt outside of bankruptcy.”).

²³ *In re Smith*, 665 B.R. 807, 817 (Bankr. D. Minn. 2024) (citing *Katchen v. Landy*, 382 U.S. 323 (1966)).

Proofs Claims in this case. All of the foregoing entities have access to Survivor Proofs Claims under the Bar Date Order and as part of mediation, and have received notice of this Motion. Accordingly, the Court should find that the filing of a Survivor Proof of Claim is the filing of an action for purposes of the CVA Amendment as to the Debtor and all of its Catholic Affiliates.

IV. THE TIME FOR SURVIVORS TO FILE AN ACTION UNDER THE CVA AMENDMENT MUST BE TOLLED

53. While normally when a claim is filed is irrelevant because a creditor's time to act is extended as a matter of federal law through the end of the bankruptcy case, 11 U.S.C. § 108(c), the situation here creates a unique quagmire for Survivors.

54. Namely, it is unclear whether the CVA Amendment "fixes a period for commencing or continuing a civil action in a court other than a bankruptcy court on a claim against the debtor....," and is therefore subject to mandatory tolling under the Bankruptcy Code. 11 U.S.C. § 108(c). Moreover, it is ambiguous from the text of 11 U.S.C. § 108(c) whether claims against non-debtors who are protected by the Stay Extension Order would automatically enjoy such extensions.

55. The Maryland legislature has made it clear in other contexts that creditors of a debtor in bankruptcy proceedings should benefit from a per se tolling of the statute of limitations applicable to their claims and enjoy additional time to file actions after those claims are no longer subject to a bankruptcy stay.²⁴

56. The Maryland Code provides that "the time between the filing and the dismissal is not included in determining whether a claim against the debtor is barred by the statute of

²⁴ Md. Cts. & Jud. Proc. Code Ann. § 5-202.

limitations.”²⁵ This provision “tolls any state statute of limitations that arises between the filing of a ‘petition in insolvency’ and its dismissal.”²⁶

57. Accordingly, even if the filing of a proof of claim is not the filing of an action for purposes of the CVA Amendment, the Court should find that Section 108(c) and Md. Code, Cts. & Jud. Proc. § 5-202 provide that Survivors who file an action in Maryland’s courts within 30 days after the termination of the automatic stay and/or dismissal of this case, are entitled to treatment as if they filed their action prior to the June 1, 2025 effective date of the CVA Amendment.

LOCAL RULE 9013 STATEMENTS

58. Pursuant to Local Rule 9013-2, the Committee will not be filing a separate memorandum with respect to this Motion and relies solely upon the grounds and authorities set forth in the Motion.

59. In accordance with Local Rule 9013-6, which requires all parties in a contested matter to file a statement in compliance with Local Rule 7012-1(b), the Committee hereby consents to the entry of a final order or judgment by the presiding Bankruptcy Judge with respect to the Motion.

CONCLUSION

WHEREFORE, Survivors and other parties in interest are entitled to understand whether Survivors’ compliance with this Court’s Bar Date Order, constitutes the filing of an action for purposes of the CVA Amendment’s June 1, 2025 effective date, or whether they must take immediate action and file their claims in a non-bankruptcy forum by May 31, 2025. For the

²⁵ Md. Cts. & Jud. Proc. Code Ann. § 5-202.

²⁶ *Minh-Vu Hoang v. Lowery*, 228 A.3d 1148, 1154 (Md. 2020); *see also Ali v. CIT Tech. Financing Services, Inc.*, 6 A.3d 890, 901 (Md. 2010) (“[I]t is clear that, in 1814, at § 5–202’s predecessor’s inception, the Maryland Legislature intended the tolling provision to apply to what is now covered by federal bankruptcy proceedings.”).

foregoing reasons, the Committee respectfully requests that the Court grant the Motion and enter an order: (1) modifying the automatic stay to allow the Survivors to continue civil litigation against the Debtor and to pursue direct action claims against the Catholic Affiliates; and (2) determining that, by filing a Survivor Proof of Claim in this bankruptcy proceeding, Survivors have filed an action for purposes of the CVA Amendment as to the Debtor, the Additional Catholic Defendants, and all of the Other Catholic Affiliates, and (3) that the Stay Extension Order does not apply to CVA actions filed against any of the Non-AOB Defendants.

Date: April 16, 2025.

Respectfully submitted,

/s/ Richard L. Costella

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY, that on this 16th day of April 2025, copies of the foregoing ***OFFICIAL COMMITTEE OF UNSECURED CREDITORS' EXPEDITED MOTION FOR (I) RELIEF FROM THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 362(D)(1) AND (II) AN ORDER ESTABLISHING THE DATE ON WHICH PROOFS OF CLAIM INITIATED OR COMMENCED A PROCEEDING UNDER MARYLAND'S CVA***, and ***NOTICE*** thereof, was served to all parties that are registered to receive electronic filing through the CM/ECF system on the attached list.

/s/ Richard L. Costella _____
Richard L. Costella

The following parties received CM/ECF notice of the filing:

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EXHIBIT A

Exhibit A**Additional Catholic Defendants**

Entity	Also on Exhibit B
All Saints Catholic School (Baltimore)	
All Saints Church (Baltimore)	
All Saints Liberty Church (Baltimore)	
Annunciation Church Sacristy (Baltimore)	
Archbishop Borders School (Unknown)	
Archbishop Curley High School (Baltimore)	
Archbishop Keough High School (Baltimore)	*
Archbishop Spalding High School (Severn)	
Ascension Roman Catholic Church and School (Arbutus)	
Baltimore Archdiocese	
Bishop John Neumann Middle School (Unknown)	
Bishop Walsh School (Cumberland)	
Blessed Sacrament (Unknown)	
Calvert Hall College High School (Towson)	*
Camp St. Vincent (Annapolis)	*
Cardinal Gibbons High School (Raleigh, NC)	*
Cardinal Gibbons School (Baltimore)	
Cardinal Shehan School (Unknown)	
Cathedral of Mary Our Queen (Unknown)	
Cathedral St (Baltimore)	
Catholic Charities	*
Catholic Community at Relay (Relay)	
Catholic Community of Ascension & St. Augustine (Elkridge)	
Catholic Deaf Center (Unknown)	*
Catholic High School of Baltimore (Baltimore)	*
Christ the King (Unknown)	*
Church of Ascension (Halethorpe)	
Church of St. Clement Mary Hofbauer (Rosedale)	
Church of St. Mark (Fallston)	
Church of St. Mary of the Annunciation (Unknown)	
Church of the Blessed Sacrament (Baltimore)	
Church of the Good Shepherd (Glen Burnie)	
Church of the Immaculate Conception (Baltimore)	
Church of the Resurrection (Ellicott City)	
Father Charles Hall School (Baltimore)	
Fourteen Holy Martyrs (Unknown)	
Fr. Gabriel Richard Catholic High School (Ann Arbor, MI)	*
Franciscan Mission (Ellicott City)	*
Franciscan Youth Center (Baltimore)	*
GMBC (Unknown)	
Good Shepherd Center (Unknown)	*
Holy Cross Catholic Church (Baltimore)	
Holy Cross School (Unknown)	*
Holy Family Catholic Church (Unknown)	
Holy Redeemer Catholic Church (Kensington)	*

Exhibit A**Additional Catholic Defendants**

Entity	Also on Exhibit B
Holy Redeemer College (Washington, DC)	
Holy Redeemer Roman Catholic Church (Baltimore)	
Holy Rosary (Unknown)	
Holy Rosary Catholic School (Baltimore)	
Holy Rosary Church (Baltimore)	
Holy Trinity Parish (Glen Burnie)	
Holy Trinity School (Anne Arundel)	
House of Good Shepherd (Unknown)	*
Immaculate Conception (Towson)	
Immaculate Heart of Mary (Unknown)	
Immaculate Heart of Mary School (Unknown)	
John Carroll High School (Bel Air)	
John Paul Regional (Unknown)	
Loyola Blakefield High School (Towson)	*
Loyola College (Baltimore)	*
Lwanga Center Morgan State University (Baltimore)	*
Marie Elizabeth Lange Center (Unknown)	*
Maryland Province of the Society of Jesus Offices (Baltimore)	*
Maryvale Preparatory School (Unknown)	*
Monastery in the Archdiocese of Baltimore (Baltimore)	*
Most Precious Blood (Baltimore)	*
Most Precious Blood (Unknown)	
Mount de Sales Academy (Cantonsville)	
Mount St. Joseph's Catholic High School (Baltimore)	*
Mount St. Mary's College/Seminary (Unknown)	*
Mt. Carmel (Baltimore)	
New All Saints (Unknown)	
Newman Center at Johns Hopkins University (Baltimore)	
Our Lady of Fatima (Unknown)	*
Our Lady of Good Counsel (Olney)	*
Our Lady of Hope (Unknown)	
Our Lady of Lourdes (Unknown)	
Our Lady of Mount Carmel (Essex)	
Our Lady of Mount Carmel School (Unknown)	*
Our Lady of Mt. Carmel (Baltimore)	
Our Lady of Mt. Carmel Parish and High School (Middle River)	
Our Lady of Perpetual Help (Ellicott City)	
Our Lady of Perpetual Help (Unknown)	
Our Lady of Perpetual Help (Woodlawn)	
Our Lady of Pompei (Unknown)	
Our Lady of Pompei Church (Baltimore)	
Our Lady of Sorrows (Unknown)	
Our Lady of the Cape (Cape St. Claire)	
Our Lady of the Fields (Millersville)	
Our Lady of Victory (Unknown)	

Exhibit A**Additional Catholic Defendants**

Entity	Also on Exhibit B
Our Lady of Victory Church (Baltimore)	
Our Lady of Victory School (Unknown)	
Our Lady Queen of Peace Church (Unknown)	*
Pallotine Seminary at Green Hill	
Prince of Peace (Edgewood)	
Queen of Peace (Middle River)	
Sacred Heart (Glyndon)	
Sacred Heart Catholic Church (Baltimore)	*
Sacred Heart of Jesus Church (Unknown)	
Sacred Heart of Jesus School (Baltimore)	
Sacred Heart of Mary (Unknown)	
Sacred Heart of Mary Church (Baltimore)	
Sacred Heart of Mary School (Baltimore)	
Sacred Heart Roman Catholic Church (Reisterstown)	*
Saint Catherine Laboure (Harrisburg, PA)	
Saint Frances Charles Hall High School (Baltimore)	*
Saint George Catholic Church (Scottsville, VA)	
Seton Keough High School (Baltimore)	
Shrine of Our Lady of Perpetual Help (Baltimore)	
Shrine of the Little Flower (Unknown)	
Shrine of the Sacred Heart (Unknown)	
Sisters of Mercy of the Union (Baltimore)	*
Sisters of Notre Dame (Baltimore)	*
Sisters of Notre Dame (Unknown)	*
Sparks Catholic Youth Organization (Unknown)	
SS Peter and Paul Catholic Church and School (Easton)	*
SS. Peter and Paul (Unknown)	
SS. Philip and James (Baltimore)	*
SS. Philip and James (Unknown)	
St. Agnes (Unknown)	
St. Agnes Catholic Church (Catonsville)	
St. Agnes School (Unknown)	
St. Alphonsus (Unknown)	
St. Alphonsus Church (Baltimore)	
St. Alphonsus Rodriguez (Woodstock)	
St. Ambrose (Baltimore)	
St. Ambrose (Unknown)	
St. Ambrose School (Baltimore)	
St. Andrew by the Bay (Cape St Claire)	
St. Ann (Hagerstown)	
St. Ann's Catholic Church (Baltimore)	
St. Anthony of Padua (Baltimore)	
St. Anthony of Padua (Lancaster, PA)	
St. Anthony of Padua (Unknown)	
St. Anthony School (Baltimore)	

Exhibit A**Additional Catholic Defendants**

Entity	Also on Exhibit B
St. Athanasius (Unknown)	
St. Athanasius Church (Baltimore)	
St. Augustine (Elkridge)	
St. Augustine Catholic Church and School (Elkridge)	
St. Bartholomew (Manchester)	
St. Benedict (Unknown)	
St. Bernard Church (Baltimore)	
St. Bernardine (Unknown)	*
St. Bernardine's Church (Baltimore)	
St. Bridget's Church (Baltimore)	
St. Brigid's Catholic (Baltimore)	
St. Casimir Catholic School (Unknown)	*
St. Cathedral of Mary - Our Queen School (Unknown)	
St. Catherines School (Unknown)	
St. Cecilia (Unknown)	
St. Charles Borromeo (Unknown)	
St. Charles College/Seminary (Baltimore)	*
St. Clare (Unknown)	
St. Clare Catholic Church (Essex)	
St. Clare Parish (Baltimore)	
St. Clare Parish and School (Essex)	
St. Clement (Unknown)	
St. Clement Catholic Church (Baltimore)	
St. Clement Mary Hofbauer (Unknown)	
St. Clements Catholic School (Baltimore)	*
St. Clements Church (Lansdowne)	
St. Clement's School (Unknown)	
St. Dominic (Unknown)	
St. Dominic Church (Baltimore)	
St. Dominic Elementary and Middle School (Unknown)	
St. Dominic Elementary and Middle School Address of Institution (U	
St. Dominic's Church (Baltimore)	
St. Edward (Baltimore)	
St. Edward's Church (Unknown)	
St. Edward's Middle School (Baltimore)	
St. Elizabeth Ann Seton (Crofton)	
St. Elizabeth Church (Rockville)	*
St. Elizabeth of Hungary (Baltimore)	*
St. Elizabeth Roman Catholic Church (Baltimore)	
St. Elizabeth School (Baltimore)	
St. Elizabeth's Catholic School (Unknown)	
St. Elizabeth's of Hungary (Unknown)	
St. Frances Academy (Baltimore)	*
St. Frances Neighborhood Center (Unknown)	*
St. Frances-Charles Hall (Baltimore)	

Exhibit A**Additional Catholic Defendants**

Entity	Also on Exhibit B
St. Francis Charles Hall Catholic School (Unknown)	
St. Francis Church (Unknown)	*
St. Francis Neighborhood Center (Baltimore)	*
St. Francis of Assisi (Baltimore)	*
St. Francis of Assisi (Brunswick)	
St. Francis of Assisi Church and School (Unknown)	
St. Francis Xavier (Baltimore)	
St. Francis's Monestary (Harrisburg, PA)	*
St. Gerard's Chapel (Baltimore)	
St. Gregory's (Unknown)	
St. Gregory's the Great Catholic Church (Baltimore)	
St. Gregory's the Great Catholic Church (Unknown)	
St. Ignatius (Baltimore)	*
St. Ignatius (Hickory)	
St. Isaac Jogues (Unknown)	*
St. James and John Church (Unknown)	
St. James and St. John Catholic School (Baltimore)	
St. James Boarding School (Hagerstown)	*
St. James the less Roman Catholic Church (Baltimore)	
St. Jane Frances (Riveria Beach)	
St. Jerome Church (Unknown)	
St. Joan of Arc (Aberdeen)	
St. John (Westminster)	
St. John the Evangelist (Columbia)	
St. John the Evangelist (Long Green Valley - Hydes)	
St. John the Evangelist (Severna Park)	
St. John the Evangelist (Unknown)	*
St. Johns and St. James Parish (Baltimore)	
St. Joseph (Cockeysville)	
St. Joseph (Fullerton)	
St. Joseph (Hagerstown)	
St. Joseph (Taneytown)	
St. Joseph (Unknown)	*
St. Joseph Passionist Monastery (Baltimore)	
St. Joseph School (Cockeysville)	
St. Joseph-on-Carrollton Manor (Buckeystown)	
St. Joseph-On-Carrollton Manor (Frederick)	
St. Joseph's Parish (Nottingham)	*
St. Katherine (Baltimore)	*
St. Lawrence (Unknown)	
St. Lawrence Parish (Woodlawn)	
St. Leo (Unknown)	
St. Leo the Great (Baltimore)	
St. Louis (Clarksville)	*
St. Luke (Unknown)	

Exhibit A**Additional Catholic Defendants**

Entity	Also on Exhibit B
St. Margaret (Bel Air)	
St. Maria Goretti Catholic High School (Hagerstown)	
St. Mark (Catonsville)	*
St. Mark's Parish (Unknown)	
St. Martin Church of Christ (Baltimore)	*
St. Martin's (Baltimore)	
St. Mary (Annapolis)	
St. Mary (Hagerstown)	
St. Mary of the Assumption (Govans)	
St. Mary of the Assumption School (Baltimore)	
St. Mary Star of the Sea (Baltimore)	
St. Mary's (Baltimore)	
St. Mary's (Cumberland)	
St. Mary's (Lanoconing)	
St. Mary's Church (Unknown)	
St. Mary's Industrial Home for Boys (Unknown)	
St. Mary's Parish (Annapolis)	
St. Mary's Seminary (Unknown)	*
St. Mary's Star of the Sea Catholic School and Parish (Unknown)	
St. Matthew (Unknown)	*
St. Matthews Lutheran Church (Unknown)	*
St. Michael (Unknown)	*
St. Michael- St. Clement School (Baltimore)	
St. Michael the Archangel (Baltimore)	*
St. Michael the Archangel, Overlea (Baltimore)	*
St. Michael's Church (Baltimore)	*
St. Michaels Overlea (Baltimore)	*
St. Michael's School (Unknown)	*
St. Michael's the Archangel Church (Unknown)	*
St. Patrick (Little Orleans)	
St. Patrick Church (Havre De Grace)	*
St. Patrick Parish (Cumberland)	
St. Patrick's Church (Unknown)	
St. Patrick's Roman Catholic Church (Baltimore)	
St. Peter and Paul (Baltimore)	*
St. Peter Catholic School (Unknown)	
St. Peter Claver (Fremont)	
St. Peter Claver (Unknown)	
St. Peter Claver School (Baltimore)	
St. Peter the Apostle (Unknown)	
St. Peters of West of Baltimore (Baltimore)	
St. Peter's Roman Catholic Church (Unknown)	
St. Peter's School (Baltimore City)	
St. Pius (Unknown)	
St. Pius V (Unknown)	

Exhibit A**Additional Catholic Defendants**

Entity	Also on Exhibit B
St. Pius X Church (Baltimore)	
St. Rita (Unknown)	
St. Rita's (Baltimore)	
St. Rita's Catholic School (Dundalk)	
St. Rose of Lima (Unknown)	
St. Stanislaus (Baltimore)	
St. Stephen (Unknown)	
St. Stephen's Parish of Bradshaw (Baltimore)	
St. Stephens (Kingsville)	
St. Therese Parish (Albuquerque, NM)	*
St. Thomas (Mooresville)	
St. Thomas Aquinas (Unknown)	
St. Thomas More (Unknown)	
St. Ursula Catholic Church (Unknown)	
St. Ursula School and Rectory (Parkville)	
St. Ursula's Parish and Catholic School (Unknown)	
St. Ursula's Parish Rectory (Parkville)	
St. Veronica (Unknown)	
St. Veronica Roman Catholic Congregation (Baltimore)	
St. Veronica's Catholic Church (Baltimore)	*
St. Vincent de Paul (Unknown)	*
St. Vincent de Paul Church (Baltimore)	
St. Vincent's Center (Timonium)	*
St. Vincent's Villa Residential Treatment Center (Timonium)	*
St. Visula Parish Spiritual Center and Church (Parksville)	
St. Wenceslaus (Unknown)	
St. Wenceslaus Catholic Church (Baltimore)	
St. William of York (Unknown)	
The Ascension School (Halethorpe)	
The Catholic Community School (Baltimore)	
The Catholic High School of Baltimore (Baltimore)	*
The Children's Home Catholic Church (Unknown)	*
The Woodstock College (Baltimore)	*
Towson Catholic School (Towson)	
Villa Maria Church (Unknown)	*
Villa Maria Orphanage (Unknown)	*
Villa Maria School (Timonium)	*
Xaverian Brother	

EXHIBIT B

Exhibit B**Non-AOB Defendants**

Entity
Archbishop Keough High School (Baltimore)
Boy Scouts of America
Boys Village School (Cheltenham)
Calvert Hall College High School (Towson)
Camp St. Vincent (Annapolis)
Cardinal Gibbons High School (Raleigh, NC)
Catholic Charities
Catholic Deaf Center (Unknown)
Catholic High School of Baltimore (Baltimore)
Caton Nursing Home (Baltimore)
Cedar Knoll Juvenile Detention Center (Laurel)
Christ the King (Unknown)
Christian Life Community
Church of the Holy Trinity (Baltimore)
Deaf Youth Ministry
Democratic Club
Fr. Gabriel Richard Catholic High School (Ann Arbor, MI)
Franciscan Mission (Ellicott City)
Franciscan Youth Center (Baltimore)
Good Shepherd Center (Unknown)
Holy Cross School (Unknown)
Holy Redeemer Catholic Church (Kensington)
House of Good Shepherd (Unknown)
Leonardtown Hall Junior Naval Academy (Leonardtown)
Loyola Blakefield High School (Towson)
Loyola College (Baltimore)
Lwanga Center Morgan State University (Baltimore)
Marie Elizabeth Lange Center (Unknown)
Maryland Province of the Society of Jesus Offices (Baltimore)
Maryvale Preparatory School (Unknown)
Maxey Boy Training School (Whitmore Lake, MI)
Monastery in the Archdiocese of Baltimore (Baltimore)
Most Precious Blood (Baltimore)
Mount St. Joseph's Catholic High School (Baltimore)
Mount St. Mary's College/Seminary (Unknown)
Oak Hill Youth Center (Laurel)
Our Lady of Fatima (Unknown)
Our Lady of Good Counsel (Olney)
Our Lady of Mount Carmel School (Unknown)
Our Lady Queen of Peace Church (Unknown)
Red House Run Elementary School (Rosedale)
RICA (Unknown)
Sacred Heart Catholic Church (Baltimore)
Sacred Heart Roman Catholic Church (Reisterstown)
Saint Frances Charles Hall High School (Baltimore)

Exhibit B**Non-AOB Defendants**

Entity
Sisters of Mercy of the Union (Baltimore)
Sisters of Notre Dame (Baltimore)
Sisters of Notre Dame (Unknown)
SS Peter and Paul Catholic Church and School (Easton)
SS. Philip and James (Baltimore)
St. Bernardine (Unknown)
St. Casimir Catholic School (Unknown)
St. Charles College/Seminary (Baltimore)
St. Clements Catholic School (Baltimore)
St. Elizabeth Church (Rockville)
St. Elizabeth of Hungary (Baltimore)
St. Frances Academy (Baltimore)
St. Frances Neighborhood Center (Unknown)
St. Francis Church (Unknown)
St. Francis Neighborhood Center (Baltimore)
St. Francis of Assisi (Baltimore)
St. Francis's Monestary (Harrisburg, PA)
St. Ignatius (Baltimore)
St. Isaac Jogues (Unknown)
St. James Boarding School (Hagerstown)
St. John the Evangelist (Unknown)
St. Joseph (Unknown)
St. Joseph's Parish (Nottingham)
St. Katherine (Baltimore)
St. Louis (Clarksville)
St. Mark (Catonsville)
St. Martin Church of Christ (Baltimore)
St. Mary's Seminary (Unknown)
St. Matthew (Unknown)
St. Matthews Lutheran Church (Unknown)
St. Michael (Unknown)
St. Michael the Archangel (Baltimore)
St. Michael the Archangel, Overlea (Baltimore)
St. Michael's Church (Baltimore)
St. Michaels Overlea (Baltimore)
St. Michael's School (Unknown)
St. Michael's the Archangel Church (Unknown)
St. Patrick Church (Havre De Grace)
St. Peter and Paul (Baltimore)
St. Therese Parish (Albuquerque, NM)
St. Veronica's Catholic Church (Baltimore)
St. Vincent de Paul (Unknown)
St. Vincent's Center (Timonium)
St. Vincent's Villa Residential Treatment Center (Timonium)
The Catholic High School of Baltimore (Baltimore)

Exhibit B

Non-AOB Defendants

Entity
The Children's Home Catholic Church (Unknown)
The Woodstock College (Baltimore)
Union Memorial Hospital (Unknown)
Villa Maria Church (Unknown)
Villa Maria Orphanage (Unknown)
Villa Maria School (Timonium)
Western Maryland College (Westminster)

EXHIBIT C

Exhibit C
Other Catholic Affiliates

Entities
Our Lady of the Mountains Cumberland (includes SS. Peter & Paul and St. Mary)
Our Lady of the Chesapeake Pasadena
Resurrection of Our Lord Laurel
St. Bernadette Severn
St. Philip Neri Linthicum Heights
Corpus Christi
Catholic Community of South Baltimore (Holy Cross, Our Lady of Good Counsel, St. Mary Star of the Sea)
Transfiguration Roman Catholic Congregation
Church of the Annunciation
Church of the Nativity (Timonium)
Holy Korean Martyrs
Our Lady of LaVang
Our Lady of the Angels (Catonsville)
St. Gabriel
Church of the Holy Spirit Joppa
St. Francis de Sales Abingdon
Church of the Resurrection Ellicott City
The Loyola School Inc.
Mount Providence Child Development Center
Francis X. Gallagher Services
Msgr. Slade Catholic School
St. Philip Neri School
School of the Incarnation
Mother Mary Lange Catholic School
Mother Seton Academy
Sisters Academy
Resurrection – St. Paul School
Cristo Rey Jesuit High School, Baltimore
Mercy High School, Baltimore
Loyola University Maryland
Jesuit Community of Loyola University, Inc.
Loyola Graduate Center-Columbia Campus
Loyola Graduate Center-Timonium Campus -
Notre Dame of Maryland University
St. Mary's Seminary and University
Ecumenical Institute of Theology
Mount Saint Mary's University
Archbishop of Baltimore Annual Appeal Trust
St. Andrew by the Bay Endowment Trust
Saint Agnes Hospital Foundation, Inc. •

Archbishop Curley High School Endowment Trust
Basilica of the Assumption Historic Trust
Bon Secours Baltimore Foundation
The Catholic Community Foundation of the Archdiocese of Baltimore, Inc.
Catholic Relief Services Foundation, Inc.
St. Elizabeth School Foundation, Inc.
The Immaculate Heart of Mary School Endowment Trust
John Carroll Foundation of the Roman Catholic Archdiocese of Baltimore
St. Joseph Manor Foundation, Inc.
The Josephine Retirees and Disability Benefits Trusts
The Josephine Seminarian Education Trust
SL Luke Parish Education Endowment Trust
St. Matthew's Parish Endowment Trust
Mercy Health Foundation, Inc.
The Paul Van Gerwin Religious & Charitable Trust -
The Sacred Heart of Mary Cemetery Continuing Care Trust
Serra Foundation
The Seton Keough High School Endowment Trust
St. Thomas Aquinas School Foundation Trust
The Thomas O'Neil Catholic Health Care Fund, Inc.
Faith Journeys Foundation, Inc.
St. Joseph, Texas Endowment Trust
The SS. Peter & Paul Parish Endowment Trust
St. Augustine School, Inc.
The St. Paul's Parish Endowment Trust
St. Peter's, Westport, School Endowment Trust
SL Joseph Midland Cemetery Continuing Care Trust
The Church of the Good Shepherd Parish Endowment Trust
St. Stephen School Endowment Trust
Family of the Americas Foundation, Inc.
St. Joseph Midland Parish Endowment Trust
St. Jane Frances Educational Endowment Trust
St. Joseph Catholic Community Endowment Trust
The Immaculate Conception Elementary School Endowment Trust
Maryland Province of the Society of Jesus Aged and Infirm Trust
Maryland Province of the Society of Jesus Formation Trust
Route 175 East, LLC
Catholic Community School Land, Inc.
Inter-Parish Loan Fund, Inc.
The Catholic Community Foundation of the Archdiocese of Baltimore, Inc.
Roman Catholic Foundation in the Archdiocese of Baltimore, Inc.
The John Carroll Foundation of the Roman Catholic Archdiocese of Baltimore, Inc.
Associated Catholic Charities, Inc.
Maryland Catholic Conference, LLC
Mercy Ridge, Inc.

Mercy Health Services, Inc.
Basilica of the National Shrine of the Assumption of the Blessed Virgin Mary
St. Jude Shrine
St. Jude Shrine Corp.
Christ Child Society of Annapolis
Alhambra, International Order of
Bon Secours Baltimore Foundation
Bon Secours Family Support Center
Cardijn Associates, Inc.
Caroline Center
Cathedral Library
The Catholic Charismatic Renewal in the Archdiocese of Baltimore, Inc.
Catholic Evidence League of Baltimore
Catholic Relief Services - United States Conference of Catholic Bishops
Chancery Office
Archbishop of Baltimore Annual Appeal Trust/Cardinal's Lenten Appeal
Archdiocesan General Insurance Program Trust
Archdiocesan Health Plan Trust Fund Agreement
Archdiocesan Priests Post-Retirement Benefits Plan Trust Fund
Cemetery Continuing Care Trust
Christian Brothers Community Support Charitable Trust
Corpus Christi Jenkins Memorial Trust, Inc.
The Dr. Charles J Foley Sr. and Mildred H. Foley Memorial Endowment Trust
Franciscan Sisters of Baltimore, Inc., Trust
GS Housing Inc.
The Gallagher Family Fund
St Gregory the Great Housing Committee
St Jane Frances Educational Endowment Trust
St John Neumann Regional School, Inc.
John Paul II Regional School Inc.
St John the Evangelist School Endowment Trust
St Jude Shrine Corporation
Marianist Charitable Trust
The Marion Burk Knoll Scholarship Fund, Educational Trust
St. Mart's Parish School Endowment Trust
Il.taryvale Educational Fund, link
Mercy Primary Care Group, Inc.
The National Black Catholic Congress, Inc.
Neumann Early Childhood Center, Inc.
Our Lady of Good Counsel Historic Trust, Inc.
St. Peter's Cemetery Restoration Fund, Joe.
St. Pius V Housing Committee, link
Plan of Self-Insurance Trust
The Priests Continuing Education and Formation Endowment Trust
Sacred Heart Community Health Services, Inc.

Sacred Heart Foundation, Inc. -
Sacred Heart Hospital of the Sisters of Charity, Inc. -
School Sisters of Notre Dame in the City of Baltimore Charitable Trust, Inc.
Sisters of Notre Dame de Namur Charitable Trusts
Sisters of Notre Dame de Namur. Maryland Province, Charitable Trust
St Vincent De Paul Historic Trust, Inc.
Women's Auxiliary Board
ChristLife, Inc.
Colombiere Jesuit Community
Cristo Rey Corporate Internship Program, Inc.
Esperanza Center Health Services Inc.
Food for Thought, Inc. -
Franciscan Center, Inc.
GS Properties Inc.
Ignatian Volunteer Corps
Inter Parish Loan Fund, Inc.
Jesuit Volunteers
St. Joseph's Society for Colored Missions
Little Sisters of the Poor Service Corporation
Marian House Inc.
Mother Mary Lange Support Corporation
Mother Seton House on Paca Street, Inc.
Mount Providence Reading Center
My Sister's Place Women's Center Fund, Inc.
Nigerialgbo Catholic Community
Our Daily Bread Employment Center Fund, Inc.
Partners in Excellence Scholarship Program
Radio Mass of Baltimore, Inc.
St. Mary's Seminary & University
Sarah's House Fund, Inc.
Stella Maris Seafarers' Center
The Benedictine Society of Baltimore. Inc.
St. Thomas More Society of Maryland Inc.
Trinitarian Counseling Services, Inc.
Union of Catholic Apostolate USA, Inc.
The Maryland State Council. Knights of Columbus -
Christian Life Community Regional Information Center
Springhill Center for Family Development
Anthony Corps. Inc.
The Baltimore Catholic League
Fr. Justin Ministry Fund, foe
Franciscan Friars Solidarity Fund, Inc.
National Shrine of St Elizabeth Ann Seton/Seton Heritage Ministries, Inc.
Seton Center Inc.
Friends of Ijebu-Ode Diocese, Inc.

Mary's Center, Inc.
Catholic Alumni Club of Baltimore
Catholic War Veterans USA, Inc.
Christ Child Society of Baltimore, Inc.
Reparation Society of the Immaculate Heart of Mary, Inc.
Baltimore Archdiocesan Holy Name Union
Legion of Mary
Odenton Senior Housing II Inc.
Jesuit Jamsbedpur Mission Society, Inc.
Jesuit Mission Bureau. Maryland Province Inc.
Jesuit Seminary Guild. Maryland Province. Inc.
Catholic Daughters of the Americas
St. Agnes HealthCare
Bon Secours Baltimore Community, Inc.
MedStar Good Samaritan Hospital
Mercy Health Services Inc.
University of Maryland St Joseph Medical Center
Belvedere Green/Woodbourne Woods at Medstar Good Samaritan
St. Martin's Home for Aged, Little Sisters of the Poor, Baltimore Inc.
The Neighborhoods at St. Elizabeth
St Joseph's Nursing Home
Ascension Living St Joseph's Place
Stella Maris
Carmelite Communities Assoc.
Carmelite Sisters of Baltimore
Chesapeake Province of the Sisters of Notre Dame de Namur
Comboni Missionary Sisters
Little Sisters of Jesus-Regional Residence
Little Sisters of the Poor, Baltimore Province, Inc.
Maria Health Care Center, Inc.
Mercy Springwell
Mission Helper Center
Missionaries of Charity
Our Lady of Mt. Providence Convent-Motherhouse
School Sisters of Notre Dame in the City of Baltimore, Inc.
Sisters of the Good Shepherd-St. Joseph Residence •
Sisters Servants of Mary Immaculate, Inc.
The Home of the All Saints Sisters of the Poor of Baltimore City
Daughters of Charity of St. Vincent de Paul, Province of St. Louise-St. Joseph House
Emmanuel Monastery
Sisters of Bon Secours
Maryland Province Center
Villa Julie Residence
St Ambrose Friary
Congregation of the Holy Spirit

Immaculate Heart of Mary Friary
Jesuit Community of Loyola University Maryland, Inc.
St. Joseph Society of the Sacred Heart House of Central Administration-
Society of St. Sulpice, Province of the United States
The Redemptorists
Our Lady of the Mountains Friary
Franciscan Friars
Friar of St Joseph Cupertino
Order of Friars Minor Convent
St Vincent's House
Holy Trinity Monastery
Msgr. Clare J. O'Dwyer Retreat House
661 Corporation
Alternative Spring Break
St. Ann Adult Day Services
Anna's House
Answers for the Aging
Associated Catholic Charities, Inc.
Baltimore City Child and Adolescent Response
Baltimore City Regional Expanded School Mental Health
The Bethany Community, Inc.
Brief Strategic Family Therapy
Caritas House Assisted Living
Carroll County Head Start
Catholic Charities Head Start of Baltimore City
Catholic Charities Senior Communities
Christopher Place Employment Academy
Congregate Housing Services Program
Esperanza Center
Everall Gardens
Family Support Groups and Resource Center
Family Systems Navigator
Francis X. Gallagher Services
GreenHouse Residences at Stadium Place
Harford County, Early Head Start
Head Start Mental Health Consultation
Holden Hall
Home-Based Respite Program
In-Home Intervention Services
Kessler Park
Project SERVE
Safe State
Samaritan Center
Sarah's House

School Based Behavioral Health Services
Social Concerns
Timonium Out-Patient Mental Health Clinic
Towson Therapeutic After School Program
Treatment Foster Care HOPE Program
Villa Maria at Edgewood Middle School
Villa Maria at Lansdowne Behavioral Health Center
Villa Maria Behavioral Health Clinic al Fallstaff
Catholic Charities Senior Housing at St. Mark's
Center for Family Services - International Adoptions
Center for Family Services - Pregnancy, Parenting and Domestic Adoption Services
Center for Family Services - Treatment Foster Care
Center for Family Services - Therapeutic Alternative
Cherry Hill Town Center (Cherry Hill Town Center, Inc.)
The Children's Fund, Inc.
Kinship Care Family Support Group
Lansdowne Therapeutic After School Program
Making All the Children Healthy (M.A.T.C.H.) Mental Health Assessment
Mental Health Counseling for Deaf Clients (Fallstaff Outpatient Mental Health Clinic)
My Sister's Place Lodge
My Sister's Place Women's Center
The Neighborhoods at St. Elizabeth Rehabilitation and Nursing Center (Jenkins Memorial Nursing Home, Inc.
Our Daily Bread Employment Center
Parish School Ministry
Parochial School Consultation Program
Pastoral Care at the Jenkins Senior Living Community
Project BELIEVE
Project FRESH
Villa Maria. Inc.
Villa Maria or Anne Arundel Country Behavioral Health Clinic
Villa Maria of Carroll County Behavioral Health Clinic
Villa Maria or Frederick County Behavioral Health Clinic
Villa Maria of Harford County Behavioral Health Clinic
Villa Maria of Mountain Maryland Behavioral Health Clinic
Villa Maria of Washington County Behavioral Health Clinic
Villa Maria School
Villa Maria School al St. Vincent's Center Type III Diagnostic Program
Village Crossroads Senior Housing D. Inc.
St. Vincent's Villa Diagnostic Evaluation and Treatment Program
St. Vincent's Villa Therapeutic Weekend Respite Program

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Baltimore Division)**

In re:

Case No. 23-16969

Roman Catholic Archbishop of Baltimore,

Chapter 11

Debtor.

Judge Michelle M. Harner

**NOTICE OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS'
EXPEDITED MOTION FOR (I) RELIEF FROM THE AUTOMATIC STAY
PURSUANT TO 11 U.S.C. § 362(d)(1) AND/OR (II) AN ORDER
ESTABLISHING THE DATE ON WHICH PROOFS OF CLAIM INITIATED
OR COMMENCED A PROCEEDING UNDER MARYLAND'S CVA**

The Official Committee of Unsecured Creditors (“Committee” or “Movant”), by its undersigned attorneys, has filed a motion for relief from the automatic stay pursuant to 11 U.S.C. §§ 362(d) (the “Motion”) in which it seeks an order of the Court: (1) modifying the automatic stay to allow the Survivors¹ to commence and continue civil litigation against the Debtor, and/or its Catholic Affiliates; and (2) for purposes of the CVA Amendment, scheduled to take effect on June 1, 2025, determining that Survivor Proofs of Claim filed in this bankruptcy proceeding constitute the filing of an action by each claimant, against (i) the Debtor, (ii) all entities named in Survivor Proofs of Claim, and/or (iii) all other entities alleged to be protected by the automatic stay.

If you do not want the Court to grant the Motion, or if you want the Court to consider your views on the Motion, then by **12:00 p.m. (EST) on April 30, 2025** you or your lawyer must file a written response with the Clerk of the Bankruptcy Court explaining your position and mail a copy to:

Richard L. Costella, Esquire
Tydings & Rosenberg LLP
One East Pratt Street, Suite 901
Baltimore, MD 21202

Robert T. Kugler, Esquire
Edwin H. Caldie, Esquire
Stinson LLP
50 South Sixth Street, Suite 2600
Minneapolis, MN 55402

¹ Unless expressly defined in this Notice, defined terms utilized herein shall have the meanings ascribed to them in the Motion.

If you mail rather than deliver your response to the Clerk of the Bankruptcy Court for filing, you must mail it early enough so that the Court will receive it by the date stated above. **The hearing on the Motion is scheduled to be conducted virtually by ZOOM before the Honorable Michelle M. Harner on May 1, 2025 at 10:00 a.m. Parties may register for the hearing by contacting the Court at [Hearings MMH@mdb.uscourts.gov](mailto:Hearings_MMH@mdb.uscourts.gov) prior to the hearing.**

IF YOU OR YOUR LAWYER DO NOT TAKE THESE STEPS BY THE DEADLINE, THE COURT MAY DECIDE THAT YOU DO NOT OPPOSE THE RELIEF SOUGHT IN THE MOTION AND MAY GRANT OR OTHERWISE DISPOSE OF THE MOTION BEFORE THE SCHEDULED HEARING DATE.

DATE: April 16, 2025.

Respectfully submitted,

/s/ Richard L. Costella

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*Local Counsel for The Official Committee of
Unsecured Creditors*

And

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Edwin H. Caldie (MN # 388930)
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*Counsel for The Official Committee of
Unsecured Creditors*