

**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' RESPONSE IN
SUPPORT OF ITS MOTION TO FILE UNDER TEMPORARY SEAL**

The Official Committee of Unsecured Creditors (the "Committee") files this Response in Support of its Ex Parte Motion to File Under Temporary Seal (the "Motion to Seal") [Dkt. No. 2417]. By this Response, the Committee respectfully requests that the Court enter an order (i) unsealing its Disclosure Statement; and (ii) determining that no information contained in the Disclosure Statement constitutes Confidential Information of any party in interest under the Confidentiality Order (defined below). In support, the Committee states as follows:

JURISDICTION & VENUE

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the Standing Order of Reference (Standing Order 2012-05) entered by the United States District Court for the District of Maryland on July 24, 2012.

2. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b). The Committee consents to entry of a final judgment or order with respect to this Motion in the event that it is determined that, absent the consent of the parties, this Court cannot enter final orders or judgments consistent with Article III of the United States Constitution.

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

BACKGROUND

4. On September 29, 2023 (the “Petition Date”), the Debtor filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”). The Debtor continues to operate its affairs as a debtor in possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

5. The Committee was appointed by the United States Trustee on October 11, 2023 [Dkt. No. 81]. The Committee is comprised of seven survivors of child sexual abuse perpetrated by priests, teachers, and other employees of the Debtor.

6. On January 16, 2025, 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. No. 316] (the “Confidentiality Order”).

7. The Confidentiality Order defines “Confidential Information” as follows:

“Confidential Information” means all documents, proofs of claim, agreements, records, reports, data, forecasts, projections, business plans, interpretations, audit reports, and all other written, visual, or oral information, including but not limited to, profit and loss statements, balance sheets, comparative results of operations, and explanations related to the foregoing, regardless of the method of memorialization or transmission, concerning: (i) the Debtor and provided by or on behalf of the Debtor in connection with the Bankruptcy Case or any ADR Proceeding; and (ii) all other documents shared with an expectation of confidentiality as they relate to the Debtor or the Bankruptcy Case, including, but not limited to, information regarding survivors of alleged sexual abuse. For the avoidance of doubt, at no time shall any Non-Confidential Information be deemed Confidential Information.

[Dkt. No. 316 at 33].

8. Critically, the Confidentiality Order expressly excludes from the definition of “Confidential Information” certain categories of “Non-Confidential Information,” which is defined as:

Notwithstanding any other provision of this Agreement, none of the following shall be considered Confidential Information: (a) information that is or becomes publicly available, other than as a result of acts in breach of either this Agreement or other confidentiality agreements by a Party or its Authorized Recipients; (b) information that is in the Authorized Recipient's possession prior to disclosure by the Producing Party but not obtained in violation of this Agreement or other confidentiality agreement; (c) information that the Producing Party knows, at the time of disclosure, is in the possession of any Entity who is not a Party to this Agreement and is not subject to any confidentiality or non-disclosure agreement or other legal restriction on disclosure with respect to such information; (d) information that is disclosed to an Authorized Recipient by, or acquired in the ordinary course of business and in good faith from, a third party who is not, to an Authorized Recipient's knowledge, information or belief, in violation of any confidentiality agreement or this Agreement; (e) information that is independently developed, discovered, or arrived at by an Authorized Recipient without violating this Agreement; or (f) any information which the Court orders not be protected as Confidential Information or as "trade secret or confidential research, development, or commercial information" under section 107(b)(1) of the Bankruptcy Code. For the avoidance of doubt, "publicly available" information includes, without limitation, any information that may be obtained through a request under the federal Freedom of Information Act, the Maryland Public Information Act, or any similar freedom of information or open records law of any state, territory, or municipality, as well as any information lodged in the publicly searchable or reviewable records of any court or other governmental agency.

9. On April 3, 2026, the Committee filed a redacted version of its Disclosure Statement in support of the Committee's plan of reorganization for the Debtor. On the same date, the Committee filed a motion seeking leave to file the unredacted Disclosure Statement under seal.

10. On April 8, 2026, consistent with the procedures established by the Confidentiality Order, parties to the Confidentiality Order were provided three business days' written notice that the Committee intended to file a sealed and unredacted version of the Disclosure Statement with the Court.

11. On or about April 17, 2026, the Debtor filed its objection to the unsealing of the original Disclosure Statement.

12. On May 15, 2026, the Committee filed an amended Disclosure Statement in support of its First Amended Plan. Because the issue of unsealing was already before the Court and because

notice of substantially similar information had already been provided under the Confidentiality Order, the Committee filed a redacted version of its amended Disclosure Statement on the public docket and an unredacted version under temporary seal, accompanied by the Committee's Motion to Seal [Dkt. No. 2417].

13. As required by section 1125 of the Bankruptcy Code, the Disclosure Statement contains adequate information to enable holders of claims and interests to make an informed judgment about the Committee's plan. This necessarily includes financial projections and a discussion of the legal structure, business operations, and financial condition of the Debtor and hundreds of its affiliated Catholic entities, including parishes, schools, and other organizations (collectively, the "Affiliates").

14. The Disclosure Statement does not contain any document marked as confidential by any party. Moreover, the Committee does not believe that any of the information contained in the Disclosure Statement is derived from "Confidential Information" as defined in the Confidentiality Order. Rather, all such information constitutes "Non-Confidential Information" under the Confidentiality Order.

15. On May 13, 2026, the Court conducted a hearing on the temporary sealing of the Committee's Disclosure Statement. Following that hearing, the Court entered its Order Directing Debtor to File Additional Information and Legal Authority for Objection to Unredacted Information [Dkt. No. 2401].

16. Debtor has since filed its Supplemental Objection to the Official Committee of Unsecured Creditors' Ex Parte Motion to File Under Temporary Seal [Dkt. No. 2422] (the "Debtor Objection").

17. The Ad Hoc Committee of Parishes, Schools, and Affiliates (the “Ad Hoc Committee”) has now also filed an Objection.

18. The Court entered an Order on May 20, 2026 [Dkt. No. 2435] requiring any additional filings relating to the Committee’s Ex Parte Motion to File Under Temporary Seal to be filed by May 26, 2026.

ARGUMENT

Neither the Debtor nor the Ad Hoc Committee has met its burden to justify the continued sealing of any portion of the Committee’s Disclosure Statement. The objections advanced by the Debtor and the Ad Hoc Committee conflate the merits of the Committee’s plan with the separate and distinct question of whether the information in the Disclosure Statement warrants sealing. The fact that the Debtor and the Ad Hoc Committee make the unsurprising assertion that the Committee’s plan is “patently unconfirmable” has no bearing on whether the information contained in the Disclosure Statement satisfies the exacting standards required for sealing under Bankruptcy Rule 9018 and 11 U.S.C. § 107. The Court should reject these objections and permit the unredacted Disclosure Statement to be filed on the public docket.

I. The Right of Public Access Compels Disclosure and the Burden Rests Squarely and Solely on the Objecting Parties.

The public’s right to access judicial records is firmly grounded in both the First Amendment and common-law tradition. “The right of public access springs from the First Amendment and the common-law tradition that court proceedings are presumptively open to public scrutiny.” *Co. Doe v. Pub. Citizen*, 749 F.3d 246, 265 (4th Cir. 2014). This presumption may be overcome only upon a showing that “countervailing interests heavily outweigh the public interests in access.” *Id.* As the Fourth Circuit has emphasized, “[w]ithout access to judicial

opinions, public oversight of the courts, including the processes and the outcomes they produce, would be impossible.” *Id.* (collecting cases).

Under the Confidentiality Order, “the burden of establishing that such alleged Confidential Information is entitled to protection as Confidential Information shall be on the Party seeking to have the information designated as Confidential Information.” Confidentiality Order at C.3; *see also In re Williams*, No. 15-71767, 2017 WL 6278764, at *2 (Bankr. W.D. Va. Dec. 8, 2017) (“Inherent in the language of § 107(b) is the requirement that the party requesting the extraordinary relief provide the court with specific factual and legal authority demonstrating that a particular document at issue is properly classified as ‘confidential’ or ‘scandalous.’”). Accordingly, the Debtor and the Ad Hoc Committee bear the burden of demonstrating that the redacted information warrants continued protection. To sustain that burden, the objecting parties must “explicitly identify information akin to trade secrets, and describe how its release will result in an unfair commercial disadvantage.” *Minter v. Wells Fargo Bank, N.A.*, 258 F.R.D. 118, 123 (D. Md. 2009). A “bare allegation of harm” does not constitute a compelling interest sufficient to defeat the right of public access. *Co. Doe*, 749 F.3d at 269–70.

The Debtor and the Ad Hoc Committee have failed to carry this burden. Rather than identifying specific trade secrets or demonstrating concrete commercial harm, they have merely identified the categories of redacted information and offered vague assertions that the information is “proprietary.” That is insufficient. As the court in *Minter* held, “[m]anagerial structures and general information regarding business operations—the type of information sought to be protected here—fail to make the grade.” 258 F.R.D. at 123. The Debtor’s vague assertions of harm do not meet the burden required to withhold information from the public.

II. None of the Redacted Information Falls Within the Scope of Bankruptcy Rule 9018 or 11 U.S.C. § 107.

Federal Rule of Bankruptcy Procedure 9018 authorizes a court to protect a filing party from disclosure of trade secrets, confidential research, development, or commercial information, scandalous or defamatory material, or matters that a governmental unit is entitled to keep confidential by statute. *See* Fed. R. Bankr. P. 9018. “Commercial information”, for example, “has been defined as information which would cause ‘an unfair advantage to competitors by providing them information as to the commercial operations of the debtor.’” *In re Orion Pictures Corp.*, 21 F.3d 24, 27 (2d Cir. 1994) (quoting *Ad Hoc Protective Comm. for 10 1/2% Debenture Holders v. Intel Corp.*, 17 B.R. 942, 944 (B.A.P. 9th Cir. 1982)). None of the information in the Committee’s Disclosure Statement falls into any of these categories.

The Debtor’s own filings identify the following categories of information, none of which match the categories required under Rule 9018: (a) the identities of members of certain non-party entities; (b) loans made by non-party entities; (c) how Board of Trustees members are elected and removed; (d) procedures for amending non-party bylaws and articles of incorporation; (e) protocols for initiating non-party expenditures; (f) asset reporting and asset valuations; (g) non-party dissolution plans; (h) voting rights; (i) donation rules; (j) insurance and pension plans; (k) non-party investment objectives; and (l) corporate governance matters. Because the Debtor has failed to identify a valid reason under Rule 9018, and because creditors are entitled to understand the Debtor’s broad and deep involvement in the financial and organizational affairs of hundreds of its affiliated entities, the Disclosure Statement should be unsealed.

III. The Debtor’s Own Actions Undermine Its Claim of Confidentiality.

The Debtor contends that the information in the Disclosure Statement that concerns the Affiliates should be confidential because the Affiliates “are separate from the Debtor, have not

sought relief from this Court, and have not placed their confidential proprietary and financial information at issue in this bankruptcy.” Debtor Obj. at 3. This assertion is belied by the Debtor’s own actions in this case.

To start, the Debtor requires many of these organizations to publicly disclose the purportedly confidential information:

102.14 Annual Reporting to Parishioners (Parishes Only)

Procedure:

- A) The Parish should ensure that an annual reporting is given to the parishioners within 90 days after the end of each fiscal year. This report should include all Operating and Non-Operating Income and Expenses. A copy of the information communicated to parishioners (i.e. data, date, media, etc.) should be maintained at the Parish.

General Ledger & Financial Reporting, Archdiocese of Baltimore, <https://www.policy.archbalt.org/fiscal-services/102-general-ledger-financial-reporting/> (last accessed May 26, 2026).

In addition, at the outset of this case, the Debtor filed its Motion for Entry of an Order, Pursuant to Sections 105(a) and 362 of the Bankruptcy Code, Extending the Automatic Stay [Dkt. No. 12], in which it sought to extend the protections of the automatic stay to these very same Affiliates who the Debtor asserts have not sought relief or put their information at issue in this case. Having sought the benefits of bankruptcy protection on behalf of the Affiliates, the Debtor cannot simultaneously claim that those entities’ information is beyond the reach of this Court’s disclosure requirements.¹

¹ The Court granted the extension of the automatic stay to the Affiliates, at least in part, because the Debtor’s insurance policies covered the Affiliates. Second Interim Order, Pursuant to Sections 105(a) and 362 of the Bankruptcy Code, Extending the Automatic Stay to Certain Related Entities [Dkt. No. 173]. Notably, the information the Debtor wishes to keep sealed includes insurance plans, despite the Affiliates receiving the benefit of the automatic stay based on those insurance plans. Debtor Obj. at 2.

Finally, the Debtor's Chapter 11 Plan of Reorganization [Dkt. No. 2412] (the "Joint Plan"), filed jointly with certain of the Affiliates who will apparently be filing for bankruptcy themselves, appears to once again contemplate relief for the Affiliates, including a discharge or release of all Survivor claims against them, further demonstrating that their financial and organizational information is directly relevant to this case. The Debtor has placed the Affiliates' financial condition squarely at issue by seeking relief on their behalf, and the Debtor cannot now shield that information from public scrutiny.

Because the Debtor has involved its parishes, schools, and affiliates in this bankruptcy case, those affiliates are not entitled to confidentiality protections and creditors are entitled to disclosure regarding the complex financial and organizational involvement among these entities.

IV. The Debtor's Recently Filed Joint Plan Appears to Require the Very Disclosures It Seeks to Prevent by Opposing the Committee Motion.

The Debtor's position is rendered even more untenable by the terms of its own proposed, joint plan of reorganization. Under the Joint Plan filed by the Debtor and certain of its Affiliates,² several of the parishes, schools, and other Affiliates that the Debtor and the Ad Hoc Committee now seek to shield from disclosure would themselves be required to undergo a bankruptcy process. The Church's Joint Plan envisions Debtor Affiliates participating in restructuring proceedings that would necessitate the very types of financial disclosures and operational transparency that the Debtor and Ad Hoc Committee now oppose in the Committee's Disclosure Statement.

² The Debtor's Disclosure Statement acknowledges the importance of disclosure regarding its affiliates and includes comparable sections regarding the Debtor's relationships. However, the Committee notes these disclosures lack vital information, for example about the Debtor's financial interest in some of these affiliates. That financial interest is precisely the information the Debtor seeks to keep improperly under seal here. Compare Dkt. 2413 at 18 ("Route 175 East, LLC. Route 175 East, LLC was formed in 2010 to purchase and develop property for the parish community of St. Lawrence the Martyr Parish. Route 175 East, LLC currently owns the land on which St. Lawrence Martyr Catholic Church is located. The assets of Route 175 East, LLC are not assets of the RCAB.") with Dkt. 2419 at 41-42 (discussing contradictory information on ownership).

It is fundamentally inconsistent for the Debtor to argue that the Affiliates' financial and organizational information must remain sealed in the Committee's Disclosure Statement when the Debtor's own proposal would compel those same Affiliates to make comparable, if not identical or even more exacting, disclosures. The Court should not countenance the Debtor's attempt to suppress information that will inevitably become public under the Debtor's own proposed framework for reorganization.

V. The Redacted Information Was Acquired from Third Parties and Subsequently Produced by the Debtor, Rendering It Categorically Non-Confidential Under the Confidentiality Order.

The Disclosure Statement contains information provided to the Debtor by third parties and is Non-Confidential Information by virtue of its non-confidential pre-bankruptcy disclosure to the Debtor. Under the Confidentiality Order, "Non-Confidential Information" includes "information that the Producing Party knows, at the time of disclosure, is in the possession of any Entity who is not a Party to this Agreement and is not subject to any confidentiality or non-disclosure agreement or other legal restriction on disclosure with respect to such information."

The Debtor and Ad Hoc Committee have failed to show that the Debtor was not in possession of any of the at-issue information prior to executing the Confidentiality Agreement or any similar agreement. Accordingly, the Debtor and the Ad Hoc Committee have not and cannot establish that such information meets the standards for sealing under the Confidentiality Order, 11 U.S.C. § 107, or Federal Rule of Bankruptcy Procedure 9018, and so the Disclosure Statement should be unsealed.

VI. Much of the Redacted Information Is Already Publicly Available.

A substantial portion of the information contained in the Committee's Disclosure Statement is already available through public sources. The Debtor and Ad Hoc Committee fail to address any of these public disclosures or explain how the public information is nonetheless entitled to be sealed.

To start, the articles of incorporation for many of the entities at issue are accessible through the Maryland Secretary of State's business search portal. These articles would reveal the Debtor's involvement with the governance of many of its affiliates. In addition, several entities publish their audited financial statements on their public-facing websites. *E.g.*, Catholic Charities, <https://ccmd.org/about/financials/>, IPLF, <https://www.archbalt.org/wp-content/uploads/2025/12/2025-Inter-Parish-Loan-Fund-FS.pdf>, and Catholic Community Foundation, <https://ccfmd.org/about-catholic-community-foundation/annual-report/>. Other affiliate information is contained in the Debtor's own bankruptcy filings, including its Statement of Financial Affairs [Dkt. No. 145], Schedules A–H [Dkt. No. 146], and First Day Informational Brief [Dkt. No. 5]. Parishes publish their income statements and make the information widely available. *E.g.*, St. Vincent de Paul Church, <https://files.ecatholic.com/37036/documents/2025/6/St.-V-charitable-budget-v-actual-FY23.pdf>.

Information that is already publicly available also cannot be “Confidential Information” under the Confidentiality Order, nor can it satisfy the standards for sealing under Bankruptcy Rule 9018 or section 107 of the Bankruptcy Code.³ Because the Debtor and Ad Hoc Committee have failed to explain why they seek to keep publicly available information under seal, their objections should be overruled and the Disclosure Statement should be unsealed.

³ *In re Williams*, No. 15-71767, 2017 WL 6278764, at *2 (Bankr. W.D. Va. Dec. 8, 2017) (“Despite the mandates of § 107(b), the Court has no authority to seal public documents or information derived from public documents.”).

VII. Itemized Rebuttal to the Specific Redactions at Issue.

In further support of its position, the Committee specifically addresses below each category of redacted information that the Debtor and/or Ad Hoc Committee seek to have withheld from disclosure on an ongoing basis.⁴

Section of Disclosure Statement	Document Where Committee Found Information	Debtor or AHC Objection?	Rebuttal
Art. VII.e.ii.D. MCC	2024 Financial Statement	Debtor & AHC	<p>Paragraph 1 is exclusively comprised of information the Debtor received from a third-party and voluntarily produced thereafter to the Committee.</p> <p>Nothing in paragraph 2 constitutes Confidential Information, and all of it has appeared in other pleadings that the Debtor did not seek to seal or otherwise protect. <i>See, e.g., The Official Committee of Unsecured Creditors v. Roman Catholic Archbishop of Baltimore</i>, Adv. Pro. No. 24-00084-MHH (Bankr. D. Md.), Dkt. Nos. 58, 104, 140.</p>

⁴ This does not include the information contained in Art. VII.d. and Art. VII.e.ii.C. of the Committee's Disclosure Statement, as all parties agree this information should be unsealed and unredacted.

Section of Disclosure Statement	Document Where Committee Found Information	Debtor or AHC Objection?	Rebuttal
Art. VII.e.ii.E. MMLSC	Articles of Incorporation SOFA, Dkt. 145 Secured Transaction Documents-Loan Docs, Guarantees, Notes	Debtor & AHC	<p>Paragraph 1 is exclusively comprised of information from the Articles of Incorporation, which are publicly available on Maryland.gov. The identification of the Administrator was derived from The Official Catholic Directory, which is publicly available at officialcatholicdirectory.com.</p> <p>Paragraph 2 is exclusively comprised of information disclosed publicly by the Debtor in its SOFA.</p> <p>Paragraph 3 is exclusively comprised of information from deal documents that were between the Debtor and affiliated parties. Documents such as these are often public information in bankruptcy cases, and no information contained in Paragraph 3 rises to the standards considered by FRBP 9018 and 11 U.S.C. § 107.</p> <p>Additionally, this information is directly related to the Debtor's financial condition as it is a guarantor on the transaction and provided the initial funding.</p>

Section of Disclosure Statement	Document Where Committee Found Information	Debtor or AHC Objection?	Rebuttal
Art. VII.e.ii.F. JCF	Informational Brief Articles of Incorporation Bylaws Audited Financial Statements	Debtor & AHC	<p>The disputed material in Paragraph 1, the first sentence of Paragraph 2, and Paragraph 6 is exclusively derived from the Articles of Incorporation, which are publicly available on Maryland.gov.</p> <p>The additional disputed information regarding the JCF is information the Debtor received from a third-party and voluntarily produced it thereafter to the Committee.</p>
Art. VII.e.ii.G. CCF	CCF Website Audited Financial Statements	Debtor & AHC	<p>All of the disputed information in Paragraph 1 is public information. The market value is public information and found via the CCF website, and the Articles of Incorporation are publicly available on Maryland.gov. The disputed information in Paragraph 4 is also exclusively from the Articles of Incorporation.</p> <p>The remaining information regarding the CCF is information the Debtor received from a third-party and voluntarily produced it thereafter to the Committee. The Audited Financial Statements for 2024 and 2025, The Investment Performance, and Investment Reviews are all publicly available at https://ccfmd.org/about-catholic-community-foundation/reports/</p>

Section of Disclosure Statement	Document Where Committee Found Information	Debtor or AHC Objection?	Rebuttal
Art. VII.e.ii.H. NCCC	NCCC Articles of Incorporation NCCC Bylaws 2023 & 2022 Financial Statements	Debtor & AHC	<p>The first redacted sentence of paragraph 1 is comprised of information from the Articles of Incorporation, which are publicly available on Maryland.gov.</p> <p>The remainder of paragraph 1 and all of paragraphs 2, 3, and 4 are exclusively comprised of information the Debtor received from a third-party and voluntarily produced thereafter to the Committee.</p>
Art. VII.e.ii.I. RCF	RCF Bylaws 2023 & 2022 Financial Statements 2016 & 2017 Financial Statements AOB's Investment Objectives and Policies Statement Debtor's Motion for Entry of an Order, Pursuant to Section 105(a) and 362 of the Bankruptcy Code, Extending the Automatic Stay [Dkt. 12] Debtor's Statement of Financial Affairs [Dkt. 145] and Schedules A-H [Dkt. 146]	Debtor & AHC	<p>Paragraphs 1, 2, 3, and 4 are exclusively comprised of information the Debtor received from a third-party and voluntarily produced thereafter to the Committee.</p> <p>The last sentence of paragraph 3 is exclusively comprised of information from the AOB's Investment Objectives and Policies Statement, which is public pursuant to 11 U.S.C. § 107 and FRBP 9018.</p> <p>Paragraph 4 is exclusively comprised of information that has already been disclosed by the Debtor on the docket.</p>

<p>Art. VII.e.ii.J. ACC</p>	<p>ACC Articles of Incorporation</p> <p>Debtor's First Day Informational Brief [Dkt. 5]</p> <p>ACC Bylaws</p> <p>Debtor's Schedules A-H [Dkt. 146]</p> <p>Annual Financial Reports from ACC's Website</p> <p>Debtor's 2023 and 2022 Combined Financial Statements</p> <p>Debtor's 2015 Combined Financial Statements</p> <p>Debtor's Pension Plan</p> <p>ACC's General Liability Insurance Policies</p> <p>Debtor's October 20, 2021 Audit Committee Minutes</p> <p>2010 Subordination and Attornment Agreement and related Deed of Trust</p> <p>Debtor's Statement of Financial Affairs [Dkt. 145]</p> <p>Debtor's Investment Committee Meeting Minutes</p>	<p>Debtor & AHC</p>	<p>Paragraph 1 is exclusively comprised of information from the Articles of Incorporation, which are publicly available on Maryland.gov.</p> <p>Paragraph 2 is exclusively comprised of information that was already disclosed by the Debtor on the docket.</p> <p>Paragraph 3 is exclusively comprised of information derived from the Articles of Incorporation and information that had already been disclosed by the Debtor on the docket.</p> <p>Paragraph 4 is partly comprised of information derived from the Articles of Incorporation and otherwise comprised of information the Debtor received from a third-party and voluntarily produced thereafter to the Committee.</p> <p>Paragraph 5 until the last sentence is exclusively comprised of information that can be found on ACC's website, which is publicly available. The last sentence of paragraph 5 is exclusively comprised of the Debtor's pension information, which is public pursuant to 11 U.S.C. § 107 and FRBP 9018.</p> <p>Paragraph 6 until the second-to-last sentence is exclusively comprised of information the Debtor received from a third-party and voluntarily produced thereafter to the Committee. The second-to-last sentence of paragraph 6 is comprised of information that is public pursuant to 11 U.S.C. § 107 and FRBP 9018. The last sentence of paragraph 6 is exclusively comprised of information that the Debtor has already disclosed on the docket.</p> <p>Paragraph 7 is exclusively comprised of information the Debtor received</p>
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Section of Disclosure Statement	Document Where Committee Found Information	Debtor or AHC Objection?	Rebuttal
	Seek the City to Come Parish Information Package		from a third-party and voluntarily produced thereafter to the Committee.
Art. VII.e.ii.K. Route 175	Route 175's Operating Agreement 2021 Memorandum of Understanding Debtor's Schedules A-H [Dkt. 146]	Debtor & AHC	<p>Creditors have a direct interest in understanding why the Debtor formed this entity and the Debtor's financial interests in the entity.</p> <p>Paragraphs 1, 3, and 5 are exclusively comprised of information derived from the Operating Agreement, which the Debtor received from a third-party and voluntarily produced thereafter to the Committee.</p> <p>Paragraphs 2 and 4 are exclusively comprised of information from the Memorandum of Understanding that the Debtor received from a third-party and voluntarily produced thereafter to the Committee.</p> <p>Paragraph 6 is exclusively comprised of information the Debtor has already disclosed on the docket.</p>
Art. VII.e.ii.L. CCSL	CCSL Articles of Incorporation Debtor's Schedules A-H [Dkt. 146]	Debtor & AHC	Paragraph 1 until the last sentence is exclusively comprised of information from the Articles of Incorporation, which are publicly available on Maryland.gov. The last sentence of paragraph 1 is exclusively comprised of information that the Debtor has already disclosed on the docket.

Section of Disclosure Statement	Document Where Committee Found Information	Debtor or AHC Objection?	Rebuttal
Exhibit A-2 CCF	Audited Financial Statements	AHC	<p>The information regarding the CCF is exclusively comprised of information the Debtor received from a third-party and voluntarily produced thereafter to the Committee.</p> <p>Further, the Audited Financial Statements for 2024 and 2025, The Investment Performance, and Investment Reviews are all publicly available at https://ccfmd.org/about-catholic-community-foundation/reports/</p>
Exhibit A-3 Parishes	Parish Profit & Loss Charts	AHC	<p>Exhibit A-3 is exclusively comprised of information from the profit & loss charts that the Debtor received from a third-party and voluntarily produced thereafter to the Committee.</p> <p>Parish financial information is public information and is required to be disclosed pursuant to the Debtor's internal policies.</p>
Exhibit A-4 Parish Schools	Parish School Profit & Loss Charts	AHC	<p>Exhibit A-4 is exclusively comprised of information from the profit & loss charts that the Debtor received from a third-party and voluntarily produced thereafter to the Committee.</p> <p>Parish financial information is public information and is required to be disclosed pursuant to the Debtor's internal policies.</p>
Exhibit A-5 ACC	Audited Financial Statements	AHC	<p>Exhibit A-5 is exclusively comprised of information that is publicly available on ACC's website (https://cc-md.org/about/financials/).</p>

Section of Disclosure Statement	Document Where Committee Found Information	Debtor or AHC Objection?	Rebuttal
Exhibit A-6 ABSHS	Audited Financial Statements	AHC	The information regarding the ABSHS is exclusively comprised of information the Debtor received from a third-party and voluntarily produced thereafter to the Committee.
Exhibit B-1 Combined	Debtor's Schedules A–H [Dkt. 146] Debtor's Audited Financial Statements Financial Statements for entities in Exhibits B-4.1-4.16 (listed below; see individual entities below for more detailed information) ACC Audited Financial Statements	AHC	The analysis is comprised of information from the following: the Debtor's Schedules (which the Debtor has already disclosed on the docket), the Debtor's Audited Financial Statements (which are public pursuant to 11 U.S.C. § 107 and FRBP 9018), the other entities' financial statements (which the Debtor received from a third-party and voluntarily produced thereafter to the Committee), and the ACC Financial Statements (which are publicly available on ACC's website (https://cc-md.org/about/financials/)).
Exhibit B-2 Combined	Debtor's Schedules A–H [Dkt. 146] Debtor's Audited Financial Statements Financial Statements for entities in Exhibits B-4.1-4.16 (listed below; see individual entities below for more detailed information) ACC Audited Financial Statements	AHC	The analysis is comprised of information from the following: the Debtor's Schedules (which the Debtor has already disclosed on the docket), the Debtor's Audited Financial Statements (which are public pursuant to 11 U.S.C. § 107 and FRBP 9018), the other entities' financial statements (which the Debtor received from a third-party and voluntarily produced thereafter to the Committee), and the ACC Financial Statements (which are publicly available on ACC's website (https://cc-md.org/about/financials/)).

Section of Disclosure Statement	Document Where Committee Found Information	Debtor or AHC Objection?	Rebuttal
Exhibit B-3 Combined	Debtor's Schedules A–H [Dkt. 146] Debtor's Audited Financial Statements Financial Statements for entities in Exhibits B-4.1-4.16 (listed below; see individual entities below for more detailed information) ACC Audited Financial Statements	AHC	The analysis is comprised of information from the following: the Debtor's Schedules (which the Debtor has already disclosed on the docket), the Debtor's Audited Financial Statements (which are public pursuant to 11 U.S.C. § 107 and FRBP 9018), the other entities' financial statements (which the Debtor received from a third-party and voluntarily produced thereafter to the Committee), and the ACC Financial Statements (which are publicly available on ACC's website (https://cc-md.org/about/financials/)).
Exhibit B-4.2 Parishes	Parish Profit & Loss Charts	AHC	Exhibit B-4.2 is exclusively comprised of information from the profit & loss charts that the Debtor received from a third-party and voluntarily produced thereafter to the Committee. Parish financial information is public information and is required to be disclosed pursuant to the Debtor's internal policies.
Exhibit B-4.3 Parish Schools	Parish School Profit & Loss Charts	AHC	Exhibit B-4.3 is exclusively comprised of information from the profit & loss charts that the Debtor received from a third-party and voluntarily produced thereafter to the Committee. Parish financial information is public information and is required to be disclosed pursuant to the Debtor's internal policies.

Section of Disclosure Statement	Document Where Committee Found Information	Debtor or AHC Objection?	Rebuttal
Exhibit B-4.4 IPLF	Audited Financial Statements	AHC	<p>The Debtor does not seek to continue to leave the IPLF information redacted in the Disclosure Statement, but the Ad Hoc Committee's objection to this exhibit remains.</p> <p>Regardless, the information regarding the IPLF is exclusively comprised of information the Debtor received from a third-party and voluntarily produced it thereafter to the Committee. Additionally, the IPLF financial statements are publicly available on the Debtor's website at archbalt.org/the-archdiocese/fiscal-accountability.</p>
Exhibit B-4.5 CCF	2025 Audited Financial Statement	AHC	Exhibit B-4.5 is exclusively comprised of information from CCF's 2025 Financial Statement, which is publicly available on CCF's website.
Exhibit B-4.6 ACC	Audited Financial Statements	AHC	Exhibit B-4.6 is exclusively comprised of information that is publicly available on ACC's website (https://cc-md.org/about/financials/).
Exhibit B-4.7 ABSHS	Audited Financial Statements	AHC	The information regarding the ABSHS is exclusively comprised of information from the financial statements, which the Debtor received from a third-party and voluntarily produced thereafter to the Committee.
Exhibit B-4.8 ABCHS	Audited Financial Statements	AHC	The information regarding the ABCHS is exclusively comprised of information from the financial statements, which the Debtor received from a third-party and voluntarily produced thereafter to the Committee.

Section of Disclosure Statement	Document Where Committee Found Information	Debtor or AHC Objection?	Rebuttal
Exhibit B-4.9 BWHS	Audited Financial Statements	AHC	The information regarding the BWHS is exclusively comprised of information from the financial statements, which the Debtor received from a third-party and voluntarily produced thereafter to the Committee.
Exhibit B-4.10 SMGHS	Audited Financial Statements	AHC	The information regarding the SMGHS is exclusively comprised of information from the financial statements, which the Debtor received from a third-party and voluntarily produced thereafter to the Committee.
Exhibit B-4.11 JCF	Audited Financial Statements	AHC	The information regarding the JCF is exclusively comprised of information the Debtor received from a third-party and voluntarily produced thereafter to the Committee.
Exhibit B-4.12 MCC	Audited Financial Statements	AHC	The information regarding the MCC is exclusively comprised of information the Debtor received from a third-party and voluntarily produced thereafter to the Committee.
Exhibit B-4.13 MMLSC	Audited Financial Statements	AHC	The information regarding the MMLSC is exclusively comprised of information the Debtor received from a third-party and voluntarily produced thereafter to the Committee.
Exhibit B-4.14 NCCC	2023 Audited Financial Statements	AHC	Exhibit B-4.14 is exclusively comprised of the financial statements, which the Debtor received from a third-party and voluntarily produced thereafter to the Committee.

Section of Disclosure Statement	Document Where Committee Found Information	Debtor or AHC Objection?	Rebuttal
Exhibit B-4.15 RCF	2024 Audited Financial Statements	AHC	Exhibit B-4.15 is exclusively comprised of information from the financial statements, which the Debtor received from a third-party and voluntarily produced thereafter to the Committee.
Exhibit B-4.16 SMARCC	Audited Financial Statements	AHC	The information regarding the SMARCC is exclusively comprised of information from the financial statements, which the Debtor received from a third-party and voluntarily produced thereafter to the Committee.

CONCLUSION

For the foregoing reasons, the Committee respectfully requests that the Court enter an order unsealing the Disclosure Statement and determining that no information contained therein constitutes Confidential Information under the Confidentiality Order.

Date: May 26, 2026

Respectfully submitted,

/s/Alan M. Grochal

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 26th day May 2026, the Official Committee of Unsecured Creditors' Response in Support of Motion to File Under Temporary Seal was served electronically on D. Blake Roth, Esquire, Holland & Knight LLP, 511 Union Street, Suite 2700, Nashville, TN 37219, blake.roth@hkllaw.com; Catherine K. Hopkin, Esquire, YVS Law LLC, 185 Admiral of March, 2026, a copy of the Official Committee of Unsecured Creditors' Memorandum in Cochrane Drive, Suite 130, Annapolis, Maryland 21401, chopkin@yvslaw.com; and Hugh Bernstein, Esquire, Office of the United States Trustee, 101 West Lombard Street, Suite 2625, Baltimore, Maryland 21201, hugh.m.bernstein@usdoj.gov; and to all parties that are registered to receive electronic filing through the CM/ECF system on the attached list.

Dated: May 26, 2026

/s/Alan M. Grochal
Alan M. Grochal

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

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