

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
HARRISBURG DIVISION**

In re:

ROMAN CATHOLIC DIOCESE OF
HARRISBURG,

Debtor.¹

Chapter 11

Case No. 1:20-bk-00599 (HWV)

**NOTICE OF THE DEADLINE FOR TIMELY FILING PROOFS OF CLAIMS
RELATING TO, OR ARISING FROM, SEXUAL ABUSE**

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

**TO ALL PERSONS WITH CLAIMS ARISING FROM SEXUAL ABUSE FOR WHICH
THE ROMAN CATHOLIC DIOCESE OF HARRISBURG MAY BE LIABLE:**

**NOVEMBER 13, 2020 IS THE LAST DATE TO TIMELY FILE PROOFS OF CLAIMS
FOR SEXUAL ABUSE**

On February 19, 2020, the Roman Catholic Diocese of Harrisburg (the “*Debtor*”) filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “*Bankruptcy Code*”) in the United States Bankruptcy Court for the Middle District of Pennsylvania (the “*Court*”). The Debtor’s address, the case number, proof of claim form, and other relevant information related to this chapter 11 case may be obtained at the website maintained by the Debtor’s claims and noticing agent (<https://dm.epiq11.com/RCDH>). Individuals have asserted sexual abuse claims against the Debtor, on account of alleged actions by people associated with the Debtor. Any person who believes that he or she has, or may have, a claim (as defined in section 101(5) of the Bankruptcy Code) resulting or arising in whole or in part, directly or indirectly from any actual or alleged sexual offense as laid out in Chapter 31 of Title 18 of the Pennsylvania Statutes, or as the phrase “sexual abuse” is defined in 42 Pa.C.S. § 5533(b)(2)(ii), as well as any sexual conduct or misconduct, sexual abuse or molestation, indecent assault and/or battery, rape, pedophilia, ephebophilia, or sexually-related physical, sexually-related psychological, or sexually-related emotional harm, or contacts, or interactions of a sexual nature between a child and an adult, or a nonconsenting adult and another adult, sexual assault, sexual battery, sexual psychological or emotional abuse, humiliation, or intimidation, or any other conduct constituting a sexual offense, incest, or use of a child in a sexual performance, and seeking monetary damages or any other relief, under any theory of liability, including vicarious liability, any negligence-based theory,

¹ The last four digits of the Debtor’s federal tax identification number are: 4791. The Debtor’s principal place of business is located at 4800 Union Deposit Road, Harrisburg, Pennsylvania 17111.

contribution, indemnity, or any other theory based on any acts or failures to act by the Debtor or any other person or entity for whose acts or failure to act the Debtor is or was allegedly responsible, including but not limited to, claims against clergy, deacons, seminarians, employees, teachers, or volunteers, should carefully read this notice.

**YOU SHOULD CONSULT AN ATTORNEY IF YOU HAVE ANY QUESTIONS,
INCLUDING WHETHER YOU SHOULD FILE A PROOF OF CLAIM.**

LAST DATE FOR TIMELY FILING

The Court entered an order establishing **November 13, 2020** as the last date for each individual with sexual abuse claim to timely file a proof of claim. The Claims Filing Deadline and the procedures set forth below for the Sexual Abuse Claim Forms apply to all sexual abuse claims against the Debtor, based upon alleged acts of sexual abuse occurring prior February 19, 2020.

WHO SHOULD FILE

If you believe that you have a sexual abuse claim, you should file a Sexual Abuse Proof of Claim to maintain and preserve any claims that you have against the Debtor. Even if you have already filed a lawsuit against the Debtor alleging sexual abuse prior to February 19, 2020, you should still file a Sexual Abuse Claim Form to maintain and preserve your rights in the Debtor's chapter 11 case.

WHO SHOULD NOT FILE

You should ***not*** file a Sexual Abuse Claim Form if: (a) your sexual abuse claim has already been paid in full or otherwise previously settled; **OR** (b) you do not have a claim against the Debtor.

WHAT TO FILE

**FILE A SEXUAL ABUSE CLAIM FORM, A COPY OF WHICH IS ENCLOSED.
YOU MAY ALSO OBTAIN A COPY OF THE SEXUAL ABUSE CLAIM FORM BY
FOLLOWING THE INSTRUCTIONS BELOW:**

PROCEDURES FOR FILING A SEXUAL ABUSE CLAIM FORM

To file a Sexual Abuse Claim Form, take the following steps:

Fill out the Sexual Abuse Claim Form in its entirety.

For additional copies of the Sexual Abuse Claim Form: (a) photocopy the Sexual Abuse Claim Form; (b) contact the Debtor's claims and noticing agent at (866) 977-0992; (c) visit the Debtor's website at: <https://www.hbgdiocese.org>; or (d) visit the website of the Debtor's claims and noticing agent at <https://dm.epiq11.com/RCDH>.

Please note that neither the Debtor's staff nor the Debtor's claims and noticing agent is permitted to give legal advice. You should consult your own attorney for assistance regarding any such inquiries.

Return the completed original Sexual Abuse Claim Form to the Debtor's claims and noticing agent at the address set forth below by the Claims Filing Deadline. Sexual Abuse Claim Forms will be deemed timely filed only if they are **actually received** by the Debtor's claims and noticing agent by **November 13, 2020**.

If you are returning a Sexual Abuse Proof of Claim by mail, allow sufficient mailing time so that the Sexual Abuse Claim Form is **received** on or before **November 13, 2020**. Sexual Abuse Claim Forms that are postmarked before that date, *i.e.*, the Claims Filing Deadline, but which are received by the Debtor's claims and noticing agent after the Claims Filing Deadline, will be considered tardy.

Sexual Abuse Claim Forms should be delivered to the following address:

<i>If by First Class Mail:</i> Roman Catholic Diocese of Harrisburg, Claims Processing Center c/o Epiq Corporate Restructuring, LLC P.O. Box 4421 Beaverton, OR 97076-4421	<i>If by Hand Delivery or Overnight Mail:</i> Roman Catholic Diocese of Harrisburg, Claims Processing Center c/o Epiq Corporate Restructuring, LLC 10300 SW Allen Blvd. Beaverton, OR 97005
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CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM

There may be consequences for failing to file a claim. Please consult your attorney.

CONFIDENTIALITY

Filed Sexual Abuse Claim Forms will remain confidential in this chapter 11 case, unless you elect otherwise in Part 1 of the Sexual Abuse Claim Form. Therefore, the Sexual Abuse Claim Form that you file will not be available to the general public, but will be kept confidential, except that information will be provided to the Debtor, the United States Trustee for the Middle District of Pennsylvania, the Debtor's insurers, attorneys for the Committee, any unknown claims representative appointed by the Court, any settlement trustee appointed to administer payments to Sexual Abuse Claimants, prison authorities for any incarcerated Sexual Abuse Claimants, and such other persons as the Court determines should have the information in order to evaluate the sexual abuse claim, all of whom will agree to keep the information provided by you confidential. **Dated: May 6, 2020**