

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re:

The Roman Catholic Diocese of Syracuse, New
York,

Debtor.

Case No. 20-30663 (WAK)

Chapter 11

The Roman Catholic Diocese of Syracuse, New
York, *et al.*,¹

Plaintiff,

v.

Arrowpoint Capital, *et al.*,

Defendants.

Adv. Proc. No. 21-50002 (WAK)

**NOTICE OF FILING OF SUPPLEMENTS TO
MOTION FOR ENTRY OF ORDERS PURSUANT TO SECTIONS
363 AND 105(A) OF THE BANKRUPTCY CODE AND BANKRUPTCY RULE
9019 APPROVING SETTLEMENT AGREEMENTS AND POLICY BUY-BACKS
WITH CERTAIN INSURERS AND GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE, that on July 2, 2025, The Roman Catholic Diocese of Syracuse, New York (the “Diocese”), filed its *Motion for Entry of Orders Pursuant to Sections 363 and 105(a) of the Bankruptcy Code and Bankruptcy Rule 9019 Approving Settlement Agreements and Policy Buy-Backs With Certain Insurers and Granting Related Relief* [Docket No. 2946] (the “Settlement Motion”).²

¹ The caption of the adversary proceeding has been abbreviated pursuant to Federal Rule of Civil Procedure 10 and Federal Rule of Bankruptcy Procedure 7010. The full caption of this adversary proceeding is set forth in the Adversary Complaint found at Adv. Docket No. 1.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Settlement Motion.

PLEASE TAKE FURTHER NOTICE, that on July 7, 2025, the Court entered the *Order Approving the Form and Manner of Notice of the Diocese's Motion to Approve Proposed Insurance Settlements* [Docket No. 2955] (the "Settlement Notice Order").

PLEASE TAKE FURTHER NOTICE, that, in accordance with paragraph 7 of the Settlement Notice Order, on July 25, 2025, the Diocese filed the following:

- (i) *First Supplement to Motion for Entry of Orders Pursuant to Sections 363 and 105(a) of the Bankruptcy Code and Bankruptcy Rule 9019 Approving Settlement Agreements and Policy Buy-Backs With Certain Insurers and Granting Related Relief* at Docket No. 2974, attaching as ***Exhibit 1*** and ***Exhibit 2***, respectively, a clean and redline version of the updated Settlement Agreement for the Interstate Insurers, reflecting the inclusion of certain exhibits and/or schedules that were not included in the initial filing of the Settlement Motion.
- (ii) *Second Supplement to Motion for Entry of Orders Pursuant to Sections 363 and 105(a) of the Bankruptcy Code and Bankruptcy Rule 9019 Approving Settlement Agreements and Policy Buy-Backs With Certain Insurers and Granting Related Relief* at Docket No. 2975, attaching as ***Exhibit 1*** and ***Exhibit 2***, respectively, a clean and redline version of the updated settlement agreement for LMI, reflecting the inclusion of certain exhibits and/or schedules that were not included in the initial filing of the Settlement Motion.

PLEASE TAKE FURTHER NOTICE, that copies of the above-referenced documents may be obtained (i) from the Clerk's Office, United States Bankruptcy Court for the Northern District of New York, Syracuse Division, (ii) via the Court's electronic case management system at <https://ecf.nynb.uscourts.gov>, (iii) by visiting the case information website maintained by the Diocese's notice and claims agent at <https://case.stretto.com/dioceseofsyracuse/docket>, (iv) by calling 855.329.4244, or (v) by written request to the Diocese's undersigned counsel.

PLEASE TAKE FURTHER NOTICE, that a hearing on the Settlement Motion will be held before the Honorable Wendy A. Kinsella, Chief United States Bankruptcy Judge for the Northern District of New York, or such other judge as may be sitting in her stead in the James

M. Hanley U.S. Courthouse and Federal Building, 100 South Clinton Street, Syracuse, NY 13261, on **August 27, 2025 at 10:00 a.m.**, which may be continued, as necessary, without further notice except as may be filed on the Court's docket or as otherwise announced by the Court on the record at such hearing.

PLEASE TAKE FURTHER NOTICE, that responses in opposition to the relief requested in the Settlement Motion, if any, must be filed and served upon (i) counsel for the Diocese, Bond, Schoeneck & King, PLLC, One Lincoln Center, Syracuse, New York 13202 (Attn: Stephen A. Donato, Charles J. Sullivan, and Grayson T. Walter); (ii) the Office of the United States Trustee for the Northern District of New York, 10 Broad Street, Room 105, Utica, NY 13501, Attn: Erin Champion; and (iii) counsel to the Official Committee of Unsecured Creditors, Stinson LLP, Attn. Robert T. Kugler & Edwin H. Caldie, 50 South Sixth Street, Suite 2600, Minneapolis, MN 55402, and (iv) those persons who have formally appeared and requested service in this case pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure, **on or before August 15, 2025**.

Dated: July 25, 2025

BOND, SCHOENECK & KING, PLLC

By /s/ Grayson T. Walter
Stephen A. Donato (Bar Roll #101522)
Charles J. Sullivan (Bar Roll #507717)
Grayson T. Walter (Bar Roll #518237)
Sara C. Temes (Bar Roll #514148)
Justin S. Krell (Bar Roll #704364)
One Lincoln Center
Syracuse, NY 13202-1355
Telephone: (315) 218-8000
Fax: (315) 218-8100
Emails: sdonato@bsk.com
csullivan@bsk.com
gwalter@bsk.com
stemes@bsk.com
jkrell@bsk.com

*Attorneys for The Roman Catholic Diocese
of Syracuse, New York*