

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF VERMONT

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In re:

Roman Catholic Diocese of Burlington,  
Vermont,<sup>1</sup>

Case No.: 24-10205-HZC  
Chapter 11 Case

Debtor.

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**JOINT MOTION TO FURTHER AMEND FINAL ORDER (I) ESTABLISHING  
DEADLINES FOR FILING PROOFS OF CLAIM; (II) APPROVING SEXUAL ABUSE  
PROOF OF CLAIM FORM; (III) APPROVING FORM AND MANNER OF NOTICE;  
AND (IV) APPROVING CONFIDENTIALITY PROCEDURES**

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The Roman Catholic Diocese of Burlington, Vermont (the “Diocese”) and the Official Committee of Unsecured Creditors (the “Committee,” and together with the Diocese, the “Parties”)<sup>2</sup> jointly request that the Court enter an order further amending the *Final Order (I) Establishing Deadlines for Filing Proofs of Claim; (II) Approving Sexual Abuse Proof of Claim Form; (III) Approving Form and Manner of Notice; and (IV) Approving Confidentiality Procedures* (ECF Nos. 144) (the “Motion”). Specifically, the Parties request certain amendments to the definition of “Permitted Parties” to provide further clarity regarding insurers. The Parties further request certain changes to the confidentiality agreement signature requirements and the parameters surrounding the use of the Confidential Survivor Claim Forms (as defined in the

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<sup>1</sup> In accordance with Fed. R. Bankr. P. 2002(n) and 1005 and 11 U.S.C. § 342(c), as applicable, the Diocese’s address is 55 Joy Drive, South Burlington, Vermont 05403, and its Employer Identification Number (EIN) is 03-0180730.

<sup>2</sup> While London Market Insurers (“LMI”) and Interstate Fire & Casualty Company (“Interstate”) are not parties to the Motion, LMI and Interstate participated in negotiating the order amendments and do not intend to object to the Motion.

Original Order). These amendments will give the Parties and the insurers the ability to evaluate claims and to negotiate the provisions of a plan.

The Parties conferred with the Office of the United States Trustee prior to the filing of this Motion.

### **JURISDICTION AND VENUE**

1. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157 and 1334 and Rule 5005 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”). This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The petition commencing this Chapter 11 case was filed on September 30, 2024 (the “Petition Date”). The case is currently pending before this Court.

3. This Motion arises under 11 U.S.C. § 105(a), Bankruptcy Rule 9024, Fed. R. Civ. P. 60, and Local Rule 9024-1. This Motion is filed under Bankruptcy Rule 9013 and Local Rules 9013-1 to -6. Notice of this Motion is provided pursuant to Bankruptcy Rule 2002 and Local Rules 9013-3, as applicable.

### **GENERAL BACKGROUND**

4. On the Petition Date, the Diocese filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code (the “Bankruptcy Code”). The Diocese continues to operate its business as debtor in possession pursuant to 11 U.S.C. §§ 1107(a) and 1108. There is presently no pending request or motion for appointment of a trustee or examiner.

5. The Diocese is a Catholic diocese serving the entire State of Vermont. Further background information regarding the Diocese may be found in the *Affidavit of Bishop John J. McDermott in Support of Initial Pleadings and Pursuant to Local Rule 1007-1(i)* (ECF No. 13, “Bishop’s Affidavit”).

6. The Office of the United States Trustee appointed the Committee on October 22, 2024 (ECF No. 52).

7. Upon a motion by the Diocese filed on September 30, 2024 (ECF No. 11), the Court entered the *Final Order (I) Establishing Deadlines for Filing Proofs of Claim; (II) Approving Sexual Abuse Proof of Claim Form; (III) Approving Form and Manner of Notice; and (IV) Approving Confidentiality Procedures* (ECF No. 144, the “Original Order”) on December 30, 2024.

8. The Original Order established April 4, 2025 as the deadline for filing claims, including claims alleging sexual abuse. As of the date of this Motion, there are a total of 120 confidential claims alleging sexual abuse.

9. On September 16, 2025, the Diocese, in consultation with the Committee, filed a motion to amend the Original Order to expand the definition of “Permitted Parties” to include professionals retained by the Diocese or the Committee, as well as other entities against whom alleged sexual abuse claims have been filed (ECF No. 467). The Diocese also requested that “Permitted Parties” be allowed to access the Confidential Survivor Claim Forms through Firmex, Box, or any other file sharing system that the Committee and the Diocese agreed upon.

10. On September 30, 2025, the Court entered the *Order Amending Final Order (I) Establishing Deadlines for Filing Proofs of Claim; (II) Approving Sexual Abuse Proof of Claim Form; (III) Approving Form and Manner of Notice; and (IV) Approving Confidentiality Procedures* (ECF No. 486, the “Amended Order”) incorporating the Diocese’s requested amendments.

11. At the time the Diocese and the Committee negotiated the terms of the Original Order and the Amended Order, the Diocese did not believe it had any applicable insurance

coverage to satisfy alleged sexual abuse claims. (*See, e.g.*, Bishop’s Affidavit, ¶¶ 47–48, 51) (describing prior settlements and the insurance buyback in 2013).

12. It was not until the Diocese retained Insurance Archeology Services, LLC (“IAS”) (ECF No. 435) to assist the Diocese in locating insurance policies and potential coverage that the Diocese eventually discovered the possibility of insurance coverage.

13. After IAS sent inquiries to various insurers, the Diocese received communications from Interstate and LMI. Since that time, the Parties, Interstate, and LMI have been negotiating amendments to the Original Order and the Amended Order, as well as the provisions to certain confidentiality agreements.

14. The Parties, Interstate, and LMI have agreed to the amendments reflected on Exhibit A (red font) attached hereto. For the avoidance of doubt, the amendments reflected on Exhibit A are inclusive of the amendments provided for in the Amended Order (purple font).

15. As shown on Exhibit A, the Parties, Interstate, and LMI agreed to expand the definition of “Permitted Parties” to provide further clarity regarding insurers and their affiliates. Moreover, the Parties, Interstate, and LMI agreed to amend the signature requirements in Paragraph 11 to allow counsel for the insurers and their affiliates to execute a single confidentiality agreement on behalf of the insurers and their affiliates. Lastly, the Parties, Interstate, and LMI agreed to clarify the parameters regarding the use of information from Confidential Survivor Claim Forms.

16. All other amendments are merely for consistency or to reflect the entry of a further amended order, as well as to preserve the rights of Interstate and LMI in other cases or proceedings.

17. Cause exists to further amend the Original Order to give each of the Parties, Interstate, and LMI the flexibility needed to fully evaluate claims and to negotiate the provisions of a plan.

**RELIEF REQUESTED**

18. For the foregoing reasons, the Parties request that the Court enter an order further amending the Original Order.

**BASIS FOR RELIEF**

19. Federal Rule of Civil Procedure 60, as incorporated by Bankruptcy Rule 9024, allows the Court or a party in interest to make or request changes to a final order in certain circumstances. Fed. R. Civ. P. 60; Fed. R. Bankr. P. 9024.

20. More specifically, Fed. R. Civ. P. 60(b) states, in part:

(b) GROUNDS FOR RELIEF FROM A FINAL JUDGMENT, ORDER, OR PROCEEDING. On motion and just terms, the court may relieve a party or its legal representative from a final judgment, order, or proceeding for the following reasons:

- (1) mistake, inadvertence, surprise, or excusable neglect;
- (2) newly discovered evidence . . .; [or]
- ...
- (6) any other reason that justifies relief.

*Id.*

21. Any one of these would serve as grounds for the Court to further amend the Original Order as requested in this Motion. When the Original Order was entered, the Diocese’s bankruptcy case had only been pending for two months. When the Amended Order was entered, the Diocese did not believe it had any applicable insurance coverage to satisfy alleged sexual abuse claims. It is necessary to further amend the prior orders to account for the fact that insurance coverage is now at issue.

22. While amendments pursuant to Fed. R. Civ. P. 60(b)(1) and (2) are subject to a one-year limitation, amendments pursuant to Fed. R. Civ. P. 60(b)(6) just have to be made within a “reasonable time.” *See* Fed. R. Civ. P. 60(c). This Motion has been filed within a reasonable time

given that the Parties, Interstate, and LMI have just concluded their negotiations regarding the requested amendments.

**CONCLUSION**

23. The Parties respectfully request that this Court enter an order:
- a. Further amending the Original Order as described in this Motion;
  - b. Granting such other relief as the Court deems just and equitable.

Dated: March 16, 2026

*/s/ Steven R. Kinsella*

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Dated: March 16, 2026

*/s/ Brittany M. Michael*

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**EXHIBIT A**

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF VERMONT

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In re:

Roman Catholic Diocese of Burlington,  
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Case No.: 24-10205-HZC  
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**AMENDED FINAL ORDER (I) ESTABLISHING DEADLINES FOR FILING PROOFS  
OF CLAIM; (II) APPROVING SEXUAL ABUSE PROOF OF CLAIM FORM; (III)  
APPROVING FORM AND MANNER OF NOTICE; AND (IV) APPROVING  
CONFIDENTIALITY PROCEDURES**

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This matter **originally** came before the Court on the *Motion for Order (I) Establishing Deadlines for Filing Proofs of Claim, (II) Approving Sexual Abuse Claim Form, (III) Approving Form and Manner of Notice, and (IV) Approving Confidentiality Procedures (italics added)* (doc. # 11) (the “**Original Motion**”) filed by the Roman Catholic Diocese of Burlington, Vermont (the “**Diocese**”) **on September 30, 2024. Upon consideration of the Original Motion**, the Affidavit of Bishop John J. McDermott (doc. # 13), and the statements of counsel and evidence adduced with respect to the **Original Motion** at a final hearing before the Court on December 17, 2024, **(the “Final Hearing”)**. **the Court granted the Original Motion on December 30, 2024 (doc. # 144, the “Original Order”)**.

**On September 16, 2025, the Diocese filed a *Motion to Amend Final Order (I) Establishing Deadlines for Filing Proofs of Claim, (II) Approving Sexual Abuse Claim Form, (III) Approving Form and Manner of Notice, and (IV) Approving Confidentiality Procedures* (doc. # 467) (the “Amended Motion”). Upon consideration of the Amended Motion, the Affidavit of Bishop John J. McDermott (doc. # 13), and the statements of counsel**

and evidence adduced with respect to the Amended Motion at a hearing before the Court on September 30, 2025, the Court granted the Amended Motion on September 30, 2025 (doc. # 486).

On March 16, 2026, the Diocese and the Official Committee of Unsecured Creditors (the "Committee") filed a *Joint Motion to Further Amend Final Order (I) Establishing Deadlines for Filing Proofs of Claim, (II) Approving Sexual Abuse Claim Form, (III) Approving Form and Manner of Notice, and (IV) Approving Confidentiality Procedures* (doc. # 667) (the "Second Amended Motion"). Upon consideration of the Second Amended Motion, the Affidavit of Bishop John J. McDermott (doc. # 13), and the statements of counsel and evidence adduced with respect to the Second Amended Motion at a hearing before the Court on April 21, 2026 (the "Hearing"), ~~the~~ the Court finds that: (i) it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (ii) venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; (iii) this is a core proceeding pursuant to 28 U.S.C. § 157(b); (iv) due and proper notice of the **Second Amended** Motion was provided pursuant to Local Rule 9013-3; and (v) notice of the **Second Amended** Motion and the ~~Final~~-Hearing was sufficient under the circumstances. After due consideration, the Court finds that the relief, ~~on a final basis~~, as requested in the **Second Amended** Motion is in the best interests of the Diocese, its estate, and its creditors. Therefore, for good cause shown, **IT IS HEREBY ORDERED THAT:**

1. The **Original Motion, the Amended Motion, and the Second Amended Motion** ~~are~~ **GRANTED** as set forth in this **Amended** Final Order.

#### **FORM**

2. The Confidential Survivor Claim Form and Optional Supplement, the Notice of the Time for Timely Filing Proofs of Claims Relating to, or Arising from, Sexual Abuse, and the

Publication Notice, substantially in the forms attached as **Exhibits A, B, and C**,<sup>1</sup> respectively, are approved (together, the “**Sexual Abuse Claim Filing Package**”).

3. Creditors with claims other than sexual abuse claims may use the standard proof of claim form, Official Form 410.

### NOTICE

4. The form and manner of notice as approved in the ~~is-Final~~ **Original** Order fulfills the notice requirements of the Federal Rules of Bankruptcy Procedure and the Local Rules of this Court. Notice of the filing deadlines in the form and manner attached is fair and reasonable and shall provide sufficient notice to all creditors of their rights and obligations in connection with claims they may assert in this case. Accordingly, the Diocese is authorized and directed to serve and publish the notices in the manner described in the ~~is-Final~~ **Original** Order.

### DEADLINE FOR TIMELY FILING CLAIMS

5. The last day to timely file a proof of claim in this case ~~is set as was~~ **April 4, 2025**. This deadline applies to all persons, including sexual abuse claimants, and entities, other than governmental units.

6. The last day for any governmental unit to file a timely proof of claim ~~is was~~ **July 7, 2025**.

### REQUIREMENTS FOR SEXUAL ABUSE CLAIM FORMS

7. Persons asserting claims arising from “childhood sexual abuse” or “childhood physical abuse” as those terms are defined in 12 V.S.A. § 522 (“**Sexual Abuse Claims**,” or individually, “**Sexual Abuse Claim**”) for which such persons (“**Survivors**,” or individually,

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<sup>1</sup> **For purposes of this Amended Final Order, the exhibits are not attached as they were previously attached to the Court’s Original Order, and the exhibits are not impacted by any amendments. Any party in interest seeking copies of the exhibits can contact counsel for the Diocese, Katherine A. Nixon, knixon@fredlaw.com.**

“Survivor”) believe that the Diocese may be liable shall file a Confidential Survivor Claim Form and may file the Optional Supplement (**Exhibit A**).

8. Stretto, Inc. (“Stretto”) shall maintain copies of each Confidential Survivor Claim Form and Optional Supplement in electronic form in accordance with the confidentiality procedures outlined below. Stretto shall assign each Confidential Survivor Claim Form a number and shall list that number on the public claims register without a link to the Confidential Survivor Claim Form and Optional Supplement and without the name.

9. Confidential Survivor Claim Forms and Optional Supplements shall be submitted pursuant to the following confidentiality procedures:

- i. Survivors shall mail or deliver the original of a Confidential Survivor Claim Form and Optional Supplement to Stretto at the following address: Roman Catholic Diocese of Burlington, Vermont, Claims Processing, c/o Stretto, 410 Exchange, Suite 100, Irvine, CA 92602. Alternatively, Survivors may submit the Confidential Survivor Claim Form and Optional **Supplement** electronically through Stretto’s case website at: <https://case.stretto.com/diocesefurburlington/fileclaim>.
- ii. Confidential Survivor Claim Forms and Optional Supplements maintained by Stretto shall not be available for viewing or copying unless otherwise ordered by the Court. This confidentiality procedure is for the benefit of the Survivors. Accordingly, Survivors may elect to make any of the information contained in a Confidential Survivor Claim Form and Optional Supplement public, even if they elected to file the Confidential Survivor Claim Form and Optional Supplement confidentially. If a Survivor affirmatively indicates by checking the box in Part 1 of the Confidential Survivor Claim Form that the claim is to be made public, that claim shall be added to the public claims register and made publicly available. If no box is checked on a Confidential Survivor Claim Form, that form shall not be made public.
- iii. Confidential Survivor Claim Forms and Optional Supplements submitted by Survivors shall be held and treated as confidential by Stretto and the Diocese and upon request to the Permitted Parties listed below, subject to each Permitted Party executing and returning to the Diocese’s counsel **and the Committee’s counsel** a confidentiality agreement, and to such other persons as the Court determines; provided, however, that all parties with access to the Confidential

Survivor Claim Forms and Optional Supplements shall agree to keep the information provided in a Confidential Survivor Claim Form and Optional Supplement confidential (unless the Survivor elects otherwise in Part 1 of the Confidential Survivor Claim Form), provided however that anonymous data derived from the Confidential Survivor Claim Forms and Optional Supplements will not be confidential. Permitted Parties may obtain copies of Confidential Survivor Claim Forms **and Optional Supplements** in accordance with the terms of an applicable confidentiality agreement from counsel for the Diocese or counsel for the ~~committee of unsecured creditors (the “Committee”)~~ (underline removed) and through Stretto’s confidential system known as Firmex, **Box, or any other file sharing system that the Diocese and the Committee agree upon.**

- iv. “Permitted Parties,” or individually, “Permitted Party,” include(s): (a) counsel for the Diocese; (b) officers and employees of the Diocese who are necessary to assist the Diocese, (c) the Committee and its counsel; (d) **the Diocese’s insurers (the “Insurers”), together with their respective successors, administrators, retrocessionaires, reinsurers, reinsurance intermediaries, and their counsel and other professionals, including partners, counsel, associates, consultants, experts, and employees of such professionals, who are necessary to assist the foregoing in reviewing and analyzing Survivor Claims (collectively, the “Insurer Affiliated Entities”) ~~insurance companies or their successors, including any authorized claim administrators of such insurance companies, that issued or allegedly issued policies to the Diocese and their reinsurers and attorneys;~~** (e) any unknown claims representative appointed by the Court in this case; (f) any mediator, special arbitrator, or claims reviewer appointed by the Court to review and resolve the Sexual Abuse Claims; (g) any trustee appointed to administer payments to Survivors and such’s trustee’s professionals; (h) authorized representatives of a department of corrections with respect to a Sexual Abuse Claim by a Survivor who is incarcerated but only to the extent such disclosure is authorized under applicable non-bankruptcy law; (i) members of the Committee and their personal counsel (after the Confidential Survivor Claim Form and Optional Supplement has been redacted to remove the Survivor’s name, address and any other information, including, without information, identified in Part 2(A) of the Optional Supplement and the signature block); (j) law enforcement in the city or county where the Sexual Abuse Claim arose; (k) auditors of the United States Conference of Catholic Bishops charged with preparing annual audits of diocesan compliance with the Charter for the Protection of Children and Young People (after the Confidential Survivor Claim Form and Optional Supplement has been redacted to remove the Survivor’s name, address and any

other information, including, without exclusion, identified in Part 2(A) of the Optional Supplement and the signature block); (l) each parish identified in a Sexual Abuse Claim Form as to solely such form, and the following personnel from the identified parish: (1) the pastor; (2) the business administrator of the parish; (3) attorneys serving as counsel to the parish; and (4) the parish's insurance company; **(m) professionals retained by the Diocese or the Committee under 11 U.S.C. §§ 327 or 1103, respectively; (n) other entities against whom claims have been asserted, including other religious orders or congregations, as to solely such form and except that no individual named as a perpetrator in a claim shall be a Permitted Party; and (o) such other persons as the Court determines should have the information in order to evaluate Sexual Abuse Claims only upon a motion by the Diocese or the Committee.**

10. In addition to the foregoing, counsel for the Diocese and counsel for the Committee are authorized to provide copies of an individual Survivor's Confidential Survivor Claim Form, Optional Supplement, and any other documents filed in connection with the individual claimant's Confidential Survivor Claim Form and Optional Supplement to counsel representing such individual Survivor. Permitted Parties and their attorneys shall be authorized to review proofs of claim upon execution of a confidentiality agreement agreed upon by the Diocese and the Committee or pursuant to further order of the Court. The Court may approve additional Permitted Parties upon motion.

11. Counsel **or another authorized representative** for the Diocese, **and counsel for** the Committee, **the Insurers, and the Insurer Affiliated Entities** shall only be required to execute a single confidentiality agreement on behalf of those **firms or** entities and, **in the case of counsel**, their respective clients, which shall be deemed binding on their entire firm **or entity and, with respect to counsel, and** their respective clients. **For all other Permitted Parties, A**access to the Confidential Survivor Claim Forms and Optional Supplement extends only to the individual who executes the confidentiality agreement, **and A**a separate confidentiality agreement must be signed by each individual who seeks access to the records on behalf of **a the** Permitted Party.

12. Permitted Parties may use the Confidential Survivor Claim Form, Optional Supplement, and any Confidential Information<sup>2</sup> from such Sexual Abuse Claim Form contained therein, only in connection with the evaluation, prosecution or defense of the claims asserted in such Confidential Survivor Claim Form and Optional Supplement in the Diocese’s Chapter 11 Case; any related adversary proceedings or contested matters in the Chapter 11 Case; any related insurance or reinsurance coverage demands, claims, disputes, or litigation; and settlement negotiations or mediations regarding all of the foregoing, and as otherwise required by applicable federal or state laws or regulations; provided, however, that notwithstanding anything to the contrary in this **Amended** Final Order, Permitted Parties may not use Confidential Information in the Optional Supplement for any objections to a claim **but may use information from the Confidential Survivor Claim Form or information independently developed by a Permitted Party, including through discovery**; provided further that the Committee does not concede that a Permitted Party is a party in interest in the Chapter 11 Case for purposes of, among other things, having standing to object to claims **or conducting discovery** and the Committee reserves its right to oppose any Permitted Party’s assertion it is a party in interest in the Chapter 11 Case.

#### **TIMING AND FORM OF NOTICE**

13. As soon as reasonably practicable after the entry of the ~~is-Final~~ **Original** Order, the Diocese, with the assistance of Stretto, shall give notice by United States mail, first-class postage prepaid, or by electronic means, of the non-sexual abuse claim filing deadline to: (a) the United

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<sup>2</sup> “Confidential Information” means any information contained in a Confidential Survivor Claim Form and Optional Supplement except to the extent the information was known to the Permitted Party prior to being disclosed in the Confidential Survivor Claim Form and Optional Supplement, or **that** becomes generally available to the public through no act or failure on the part of the Permitted Party, is obtained from a third party under no obligation to maintain its confidentiality, or **is** developed by the Permitted Party independently without reference to any Confidential Survivor Claim Form and Optional Supplement.

States Trustee for the District of Vermont; (b) counsel to the Committee; (c) all persons and entities that have filed a notice of appearance in this case; **and** (d) all persons and entities that have previously filed proofs of claims in this Chapter 11 case.

14. As soon as reasonably practicable, but in any event no later than five business days after the entry of ~~theis Final Original~~ Order, the Diocese shall serve by United States mail, first-class postage prepaid, the Notice of the Time for Timely Filing Proofs of Claims Relating to, or Arising from, Sexual Abuse (the “Survivor Claim Notice”) (**Exhibit B**) and the Confidential Survivor Claim Form and Optional Supplement (**Exhibit A**) on the United States Trustee, and on known Survivors who have:

- i. Filed pending lawsuits against the Diocese alleging that they were sexually abused by employees or agents of the Diocese or by clergy previously assigned to the Diocese or any others for whom the debtor may be liable;
- ii. Contacted the Diocese to claim that they were sexually abused as a minor by employees or agents of the Diocese or by clergy previously assigned to the Diocese or any others for whom the Diocese may be liable;
- iii. Are otherwise known to the Diocese to be a Survivor through reasonably-ascertainable records.

15. The service of the Survivor Claim Notice and Confidential Survivor Claim Form and Optional Supplement on Survivors shall be accomplished through such Survivors’ attorneys, if previously identified as counsel for such Survivor in connection with a Sexual Abuse Claim, and directly on all other known potential Survivors that have been identified and located by the Diocese through reasonably diligent efforts.

16. The Publication Notice (**Exhibit C**) and the Survivor Claim Notice shall include a reference to this Court’s website (<https://www.vtb.uscourts.gov/>) where all claim forms shall be made available.

17. The service outlined above shall constitute service on all known creditors of the Diocese. All other creditors of the Diocese shall be deemed to be unknown for the purpose of service of notice of the Claim Filing Deadline.

18. The Diocese, with the assistance of Stretto where applicable, shall also provide notice of the Claim Filing Deadline established in ~~the~~ **Final Original** Order by causing a copy of the Publication Notice, in a form containing the same information as contained in **Exhibit C**, to be published as follows:

- i. Once, no later than 60 days prior to the Claim Filing Deadline, in *USA Today* (national edition);
- ii. Once prior to the Claim Filing Deadline in the Vermont Catholic Magazine;
- iii. Three times prior to the Claim Filing Deadline in each of: (a) National Catholic Reporter, (b) The National Catholic Register, (c) Burlington Free Press; (d) Seven Days; (e) The World; (f) Rutland Herald; (g) Mountain Times; (h) The Sun; (i) Caledonian Record; (j) Addison County Independent; and (k) NYVT Media.
- iv. The Diocese shall request that the Publication Notice is published in the above listed publications in a location other than among the standard legal notices.
- v. In addition to the Publication Notice, the Diocese shall send copies of the Sexual Abuse Claim Notice to the publications listed above and to: (a) WETK, WVER, WVTB, WCAX, WPZ, and WVNY; and (b) each diocese directly bordering the Diocese.

19. The Diocese, with the assistance of Stretto where applicable, shall provide further notice of the Claim Filing Deadline by taking the following measures:

- i. Within five business days of the entry of ~~the~~ **Final Original** Order, the Diocese shall post the component parts of the Sexual Abuse Claim Filing Package and the deadline for filing non-sexual abuse claims on its public website: <https://www.vermontcatholic.org/>;

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\* The Diocese shall also publish notification of where to locate the Sexual Abuse Claim Filing Package on any and all social media sites where it maintains a presence and shall be prepared to offer evidence of where and when such notification was posted.

- ii. Within five business days of the entry of the ~~his Final~~ **Original** Order, the Diocese shall provide a copy of the Publication Notice and the component parts of the Sexual Abuse Claim Filing Package to the Survivors Network of the Abused Priests and request that it post the same on its website: <http://www.snapnetwork.org/>.
- iii. Within five business days of the entry of the ~~his Final~~ **Original** Order, the Diocese shall provide a copy of the Publication Notice and the component parts of the Sexual Abuse Claim Filing Package to the law firms currently representing Survivors asserting claims against the Diocese and request that they post the same on their respective websites: (a) Gravel & Shea PC (<https://gravelshea.com/>), (b) Shoup Evers & Green (<https://www.seglawyersvermont.com/>), (c) Kaplan & Kaplan (<https://www.kaplanlawvt.com/>), (d) Herman Law Group (<https://hermanlaw.com/new-york/>), (e) Jeff Anderson & Associates, P.A. (<https://www.andersonadvocates.com/>), and (f) D'Arcy Johnson Day PC (<https://www.djdlawyers.com/>).
- iv. The Diocese shall maintain a telephone number published on its website (<https://www.vermontcatholic.org/>) that may be used to ask questions and request copies of the Sexual Abuse Claim Filing Package.
- v. Within two weeks of the service of the Sexual Abuse Claim Filing Package, the Diocese shall provide a copy of the Publication Notice and the component parts of the Sexual Abuse Claim Filing Package to the following offices/entities and request that each recipient publicly post such notice until the expiration of the Claim Filing Deadline: (a) the Vermont Attorney General; (b) the county attorney, county administrator, and sheriff's department for each of the counties within the Diocese's geographical area; (c) the Vermont Department of Health's locations within the Diocese's geographical area; and (d) each hospital in the Diocese's geographical area.
- vi. The Diocese shall send a letter to each parish located in the Diocese's geographical area requesting that such parish display either the Publication Notice or the Survivor Claim Notice in a prominent location within the church, school, or parish office. The letter shall also request that notices be published once a month in the parishes' weekly bulletins until the Claim Filing Deadline. The letter shall also request that each pastor, canonical administrator, or parochial vicar remind parishioners of the availability of information concerning the Claim Filing Deadline. The letter shall also request that parishes disseminate the Publication Notice or Survivor Claim Notice by e-mail to their respective distribution lists. The letter shall request

confirmation as to whether the parish has complied with the publication request and shall request: (a) the dates of publication of the notices in the parish's bulletin; and (b) a copy of the parish bulletin including such notice.

- vii. The Diocese shall request that each pastor, canonical administrator, or parochial vicar read a letter from the Bishop at Masses at least two times before the Claim Filing Deadline. The letter from the Diocese shall state that the Diocese requests that the letter be read, that the Claim Filing Deadline is April 4, 2025, that the Diocese requests that people inform their family members about the Claim Filing Deadline, and that the filing of a claim may be done confidentially.

20. In addition, Stretto shall post the component parts of the Sexual Abuse Claim Filing Package on Stretto's case website.

**21. Interstate Fire & Casualty Company's ("Interstate") and London Market Insurers' consent to the terms of this Amended Final Order is based on the unique facts and circumstances presented and Interstate and London Market Insurers reserve their rights to contest the use of the terms of this Amended Final Order in any other proceeding if applied to Interstate or London Market Insurers, and this Amended Final Order is not a precedent or evidence that should be used in future cases or proceedings against Interstate or London Market Insurers.**

22. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation and interpretation of this **Amended** Final Order.

**April \_\_, 2026**  
Burlington, Vermont

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Heather Z. Cooper  
United States Bankruptcy Judge

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF VERMONT**

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In re:

Roman Catholic Diocese of Burlington,  
Vermont,

Case No.: 24-10205-HZC  
Chapter 11 Case

Debtor.

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**AMENDED FINAL ORDER (I) ESTABLISHING DEADLINES FOR FILING PROOFS  
OF CLAIM; (II) APPROVING SEXUAL ABUSE PROOF OF CLAIM FORM; (III)  
APPROVING FORM AND MANNER OF NOTICE; AND (IV) APPROVING  
CONFIDENTIALITY PROCEDURES**

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This matter originally came before the Court on the *Motion for Order (I) Establishing Deadlines for Filing Proofs of Claim, (II) Approving Sexual Abuse Claim Form, (III) Approving Form and Manner of Notice, and (IV) Approving Confidentiality Procedures* (doc. # 11) (the “Original Motion”) filed by the Roman Catholic Diocese of Burlington, Vermont (the “Diocese”) on September 30, 2024. Upon consideration of the Original Motion, the Affidavit of Bishop John J. McDermott (doc. # 13), and the statements of counsel and evidence adduced with respect to the Original Motion at a final hearing before the Court on December 17, 2024, the Court granted the Original Motion on December 30, 2024 (doc. # 144, the “Original Order”).

On September 16, 2025, the Diocese filed a *Motion to Amend Final Order (I) Establishing Deadlines for Filing Proofs of Claim, (II) Approving Sexual Abuse Claim Form, (III) Approving Form and Manner of Notice, and (IV) Approving Confidentiality Procedures* (doc. # 467) (the “Amended Motion”). Upon consideration of the Amended Motion, the Affidavit of Bishop John J. McDermott (doc. # 13), and the statements of counsel and evidence adduced with respect to the Amended Motion at a hearing before the Court on September 30, 2025, the Court granted the

Amended Motion on September 30, 2025 (doc. # 486).

On March 16, 2026, the Diocese and the Official Committee of Unsecured Creditors (the “Committee”) filed a *Joint Motion to Further Amend Final Order (I) Establishing Deadlines for Filing Proofs of Claim, (II) Approving Sexual Abuse Claim Form, (III) Approving Form and Manner of Notice, and (IV) Approving Confidentiality Procedures* (doc. # 667) (the “Second Amended Motion”). Upon consideration of the Second Amended Motion, the Affidavit of Bishop John J. McDermott (doc. # 13), and the statements of counsel and evidence adduced with respect to the Second Amended Motion at a hearing before the Court on April 21, 2026 (the “Hearing”), the Court finds that: (i) it has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; (ii) venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409; (iii) this is a core proceeding pursuant to 28 U.S.C. § 157(b); (iv) due and proper notice of the Second Amended Motion was provided pursuant to Local Rule 9013-3; and (v) notice of the Second Amended Motion and the Hearing was sufficient under the circumstances. After due consideration, the Court finds that the relief as requested in the Second Amended Motion is in the best interests of the Diocese, its estate, and its creditors. Therefore, for good cause shown, **IT IS HEREBY ORDERED THAT:**

1. The Original Motion, the Amended Motion, and the Second Amended Motion are **GRANTED** as set forth in this Amended Final Order.

**FORM**

2. The Confidential Survivor Claim Form and Optional Supplement, the Notice of the Time for Timely Filing Proofs of Claims Relating to, or Arising from, Sexual Abuse, and the Publication Notice, substantially in the forms attached as **Exhibits A, B, and C**,<sup>1</sup> respectively, are

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<sup>1</sup> For purposes of this Amended Final Order, the exhibits are not attached as they were previously attached to the Court’s Original Order, and the exhibits are not impacted by any

approved (together, the “Sexual Abuse Claim Filing Package”).

3. Creditors with claims other than sexual abuse claims may use the standard proof of claim form, Official Form 410.

### NOTICE

4. The form and manner of notice as approved in the Original Order fulfills the notice requirements of the Federal Rules of Bankruptcy Procedure and the Local Rules of this Court. Notice of the filing deadlines in the form and manner attached is fair and reasonable and shall provide sufficient notice to all creditors of their rights and obligations in connection with claims they may assert in this case. Accordingly, the Diocese is authorized and directed to serve and publish the notices in the manner described in the Original Order.

### DEADLINE FOR TIMELY FILING CLAIMS

5. The last day to timely file a proof of claim in this case was **April 4, 2025**. This deadline applies to all persons, including sexual abuse claimants, and entities, other than governmental units.

6. The last day for any governmental unit to file a timely proof of claim was **July 7, 2025**.

### REQUIREMENTS FOR SEXUAL ABUSE CLAIM FORMS

7. Persons asserting claims arising from “childhood sexual abuse” or “childhood physical abuse” as those terms are defined in 12 V.S.A. § 522 (“Sexual Abuse Claims,” or individually, “Sexual Abuse Claim”) for which such persons (“Survivors,” or individually, “Survivor”) believe that the Diocese may be liable shall file a Confidential Survivor Claim Form and may file the Optional Supplement (**Exhibit A**).

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amendments. Any party in interest seeking copies of the exhibits can contact counsel for the Diocese, Katherine A. Nixon, knixon@fredlaw.com.

8. Stretto, Inc. (“Stretto”) shall maintain copies of each Confidential Survivor Claim Form and Optional Supplement in electronic form in accordance with the confidentiality procedures outlined below. Stretto shall assign each Confidential Survivor Claim Form a number and shall list that number on the public claims register without a link to the Confidential Survivor Claim Form and Optional Supplement and without the name.

9. Confidential Survivor Claim Forms and Optional Supplements shall be submitted pursuant to the following confidentiality procedures:

- i. Survivors shall mail or deliver the original of a Confidential Survivor Claim Form and Optional Supplement to Stretto at the following address: Roman Catholic Diocese of Burlington, Vermont, Claims Processing, c/o Stretto, 410 Exchange, Suite 100, Irvine, CA 92602. Alternatively, Survivors may submit the Confidential Survivor Claim Form and Optional Supplement electronically through Stretto’s case website at: <https://case.stretto.com/diocesefburlington/fileclaim>.
- ii. Confidential Survivor Claim Forms and Optional Supplements maintained by Stretto shall not be available for viewing or copying unless otherwise ordered by the Court. This confidentiality procedure is for the benefit of the Survivors. Accordingly, Survivors may elect to make any of the information contained in a Confidential Survivor Claim Form and Optional Supplement public, even if they elected to file the Confidential Survivor Claim Form and Optional Supplement confidentially. If a Survivor affirmatively indicates by checking the box in Part 1 of the Confidential Survivor Claim Form that the claim is to be made public, that claim shall be added to the public claims register and made publicly available. If no box is checked on a Confidential Survivor Claim Form, that form shall not be made public.
- iii. Confidential Survivor Claim Forms and Optional Supplements submitted by Survivors shall be held and treated as confidential by Stretto and the Diocese and upon request to the Permitted Parties listed below, subject to each Permitted Party executing and returning to the Diocese’s counsel and the Committee’s counsel a confidentiality agreement, and to such other persons as the Court determines; provided, however, that all parties with access to the Confidential Survivor Claim Forms and Optional Supplements shall agree to keep the information provided in a Confidential Survivor Claim Form and Optional Supplement confidential (unless the Survivor elects otherwise in Part 1 of the Confidential Survivor Claim Form),

provided however that anonymous data derived from the Confidential Survivor Claim Forms and Optional Supplements will not be confidential. Permitted Parties may obtain copies of Confidential Survivor Claim Forms and Optional Supplements in accordance with the terms of an applicable confidentiality agreement from counsel for the Diocese or counsel for the Committee and through Stretto's confidential system known as Firmex, Box, or any other file sharing system that the Diocese and the Committee agree upon.

- iv. "Permitted Parties," or individually, "Permitted Party," include(s): (a) counsel for the Diocese; (b) officers and employees of the Diocese who are necessary to assist the Diocese, (c) the Committee and its counsel; (d) the Diocese's insurers (the "Insurers"), together with their respective successors, administrators, retrocessionaires, reinsurers, reinsurance intermediaries, and their counsel and other professionals, including partners, counsel, associates, consultants, experts, and employees of such professionals, who are necessary to assist the foregoing in reviewing and analyzing Survivor Claims (collectively, the "Insurer Affiliated Entities"); (e) any unknown claims representative appointed by the Court in this case; (f) any mediator, special arbitrator, or claims reviewer appointed by the Court to review and resolve the Sexual Abuse Claims; (g) any trustee appointed to administer payments to Survivors and such's trustee's professionals; (h) authorized representatives of a department of corrections with respect to a Sexual Abuse Claim by a Survivor who is incarcerated but only to the extent such disclosure is authorized under applicable non-bankruptcy law; (i) members of the Committee and their personal counsel (after the Confidential Survivor Claim Form and Optional Supplement has been redacted to remove the Survivor's name, address and any other information, including, without information, identified in Part 2(A) of the Optional Supplement and the signature block); (j) law enforcement in the city or county where the Sexual Abuse Claim arose; (k) auditors of the United States Conference of Catholic Bishops charged with preparing annual audits of diocesan compliance with the Charter for the Protection of Children and Young People (after the Confidential Survivor Claim Form and Optional Supplement has been redacted to remove the Survivor's name, address and any other information, including, without exclusion, identified in Part 2(A) of the Optional Supplement and the signature block); (l) each parish identified in a Sexual Abuse Claim Form as to solely such form, and the following personnel from the identified parish: (1) the pastor; (2) the business administrator of the parish; (3) attorneys serving as counsel to the parish; and (4) the parish's insurance company; (m) professionals retained by the Diocese or the Committee under 11 U.S.C. §§ 327 or 1103, respectively; (n) other entities against whom claims have been asserted, including other religious orders or

congregations, as to solely such form and except that no individual named as a perpetrator in a claim shall be a Permitted Party; and (o) such other persons as the Court determines should have the information in order to evaluate Sexual Abuse Claims only upon a motion by the Diocese or the Committee.

10. In addition to the foregoing, counsel for the Diocese and counsel for the Committee are authorized to provide copies of an individual Survivor's Confidential Survivor Claim Form, Optional Supplement, and any other documents filed in connection with the individual claimant's Confidential Survivor Claim Form and Optional Supplement to counsel representing such individual Survivor. Permitted Parties and their attorneys shall be authorized to review proofs of claim upon execution of a confidentiality agreement agreed upon by the Diocese and the Committee or pursuant to further order of the Court. The Court may approve additional Permitted Parties upon motion.

11. Counsel or another authorized representative for the Diocese, the Committee, the Insurers, and the Insurer Affiliated Entities shall only be required to execute a single confidentiality agreement on behalf of those firms or entities and, in the case of counsel, their respective clients, which shall be deemed binding on their entire firm or entity and, with respect to counsel, their respective clients. For all other Permitted Parties, access to the Confidential Survivor Claim Forms and Optional Supplement extends only to the individual who executes the confidentiality agreement, and a separate confidentiality agreement must be signed by each individual who seeks access to the records on behalf of the Permitted Party.

12. Permitted Parties may use the Confidential Survivor Claim Form, Optional Supplement, and any Confidential Information<sup>2</sup> from such Sexual Abuse Claim Form contained

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<sup>2</sup> "Confidential Information" means any information contained in a Confidential Survivor Claim Form and Optional Supplement except to the extent the information was known to the Permitted Party prior to being disclosed in the Confidential Survivor Claim Form and Optional Supplement, or that becomes generally available to the public through no act or failure on the part

therein, only in connection with the evaluation, prosecution or defense of the claims asserted in such Confidential Survivor Claim Form and Optional Supplement in the Diocese's Chapter 11 Case; any related adversary proceedings or contested matters in the Chapter 11 Case; any related insurance or reinsurance coverage demands, claims, disputes, or litigation; and settlement negotiations or mediations regarding all of the foregoing, and as otherwise required by applicable federal or state laws or regulations; provided, however, that notwithstanding anything to the contrary in this Amended Final Order, Permitted Parties may not use Confidential Information in the Optional Supplement for any objections to a claim but may use information from the Confidential Survivor Claim Form or information independently developed by a Permitted Party, including through discovery; provided further that the Committee does not concede that a Permitted Party is a party in interest in the Chapter 11 Case for purposes of, among other things, having standing to object to claims or conducting discovery and the Committee reserves its right to oppose any Permitted Party's assertion it is a party in interest in the Chapter 11 Case.

#### **TIMING AND FORM OF NOTICE**

13. As soon as reasonably practicable after the entry of the Original Order, the Diocese, with the assistance of Stretto, shall give notice by United States mail, first-class postage prepaid, or by electronic means, of the non-sexual abuse claim filing deadline to: (a) the United States Trustee for the District of Vermont; (b) counsel to the Committee; (c) all persons and entities that have filed a notice of appearance in this case; and (d) all persons and entities that have previously filed proofs of claims in this Chapter 11 case.

14. As soon as reasonably practicable, but in any event no later than five business days

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of the Permitted Party, is obtained from a third party under no obligation to maintain its confidentiality, or is developed by the Permitted Party independently without reference to any Confidential Survivor Claim Form and Optional Supplement.

after the entry of the Original Order, the Diocese shall serve by United States mail, first-class postage prepaid, the Notice of the Time for Timely Filing Proofs of Claims Relating to, or Arising from, Sexual Abuse (the “Survivor Claim Notice”) (**Exhibit B**) and the Confidential Survivor Claim Form and Optional Supplement (**Exhibit A**) on the United States Trustee, and on known Survivors who have:

- i. Filed pending lawsuits against the Diocese alleging that they were sexually abused by employees or agents of the Diocese or by clergy previously assigned to the Diocese or any others for whom the debtor may be liable;
- ii. Contacted the Diocese to claim that they were sexually abused as a minor by employees or agents of the Diocese or by clergy previously assigned to the Diocese or any others for whom the Diocese may be liable;
- iii. Are otherwise known to the Diocese to be a Survivor through reasonably-ascertainable records.

15. The service of the Survivor Claim Notice and Confidential Survivor Claim Form and Optional Supplement on Survivors shall be accomplished through such Survivors’ attorneys, if previously identified as counsel for such Survivor in connection with a Sexual Abuse Claim, and directly on all other known potential Survivors that have been identified and located by the Diocese through reasonably diligent efforts.

16. The Publication Notice (**Exhibit C**) and the Survivor Claim Notice shall include a reference to this Court’s website (<https://www.vtb.uscourts.gov/>) where all claim forms shall be made available.

17. The service outlined above shall constitute service on all known creditors of the Diocese. All other creditors of the Diocese shall be deemed to be unknown for the purpose of service of notice of the Claim Filing Deadline.

18. The Diocese, with the assistance of Stretto where applicable, shall also provide

notice of the Claim Filing Deadline established in the Original Order by causing a copy of the Publication Notice, in a form containing the same information as contained in **Exhibit C**, to be published as follows:

- i. Once, no later than 60 days prior to the Claim Filing Deadline, in *USA Today* (national edition);
- ii. Once prior to the Claim Filing Deadline in the Vermont Catholic Magazine;
- iii. Three times prior to the Claim Filing Deadline in each of: (a) National Catholic Reporter, (b) The National Catholic Register, (c) Burlington Free Press; (d) Seven Days; (e) The World; (f) Rutland Herald; (g) Mountain Times; (h) The Sun; (i) Caledonian Record; (j) Addison County Independent; and (k) NYVT Media.
- iv. The Diocese shall request that the Publication Notice is published in the above listed publications in a location other than among the standard legal notices.
- v. In addition to the Publication Notice, the Diocese shall send copies of the Sexual Abuse Claim Notice to the publications listed above and to: (a) WETK, WVER, WVTB, WCAX, WPZ, and WVNY; and (b) each diocese directly bordering the Diocese.

19. The Diocese, with the assistance of Stretto where applicable, shall provide further notice of the Claim Filing Deadline by taking the following measures:

- i. Within five business days of the entry of the Original Order, the Diocese shall post the component parts of the Sexual Abuse Claim Filing Package and the deadline for filing non-sexual abuse claims on its public website: <https://www.vermontcatholic.org/>;<sup>\*</sup>
- ii. Within five business days of the entry of the Original Order, the Diocese shall provide a copy of the Publication Notice and the component parts of the Sexual Abuse Claim Filing Package to the Survivors Network of the Abused Priests and request that it post the same on its website: <http://www.snapnetwork.org/>.
- iii. Within five business days of the entry of the Original Order, the

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<sup>\*</sup> The Diocese shall also publish notification of where to locate the Sexual Abuse Claim Filing Package on any and all social media sites where it maintains a presence and shall be prepared to offer evidence of where and when such notification was posted.

Diocese shall provide a copy of the Publication Notice and the component parts of the Sexual Abuse Claim Filing Package to the law firms currently representing Survivors asserting claims against the Diocese and request that they post the same on their respective websites: (a) Gravel & Shea PC (<https://gravelshea.com/>), (b) Shoup Evers & Green (<https://www.seglawyersvermont.com/>), (c) Kaplan & Kaplan (<https://www.kaplanlawvt.com/>), (d) Herman Law Group (<https://hermanlaw.com/new-york/>), (e) Jeff Anderson & Associates, P.A. (<https://www.andersonadvocates.com/>), and (f) D'Arcy Johnson Day PC (<https://www.djdlawyers.com/>).

- iv. The Diocese shall maintain a telephone number published on its website (<https://www.vermontcatholic.org/>) that may be used to ask questions and request copies of the Sexual Abuse Claim Filing Package.
- v. Within two weeks of the service of the Sexual Abuse Claim Filing Package, the Diocese shall provide a copy of the Publication Notice and the component parts of the Sexual Abuse Claim Filing Package to the following offices/entities and request that each recipient publicly post such notice until the expiration of the Claim Filing Deadline: (a) the Vermont Attorney General; (b) the county attorney, county administrator, and sheriff's department for each of the counties within the Diocese's geographical area; (c) the Vermont Department of Health's locations within the Diocese's geographical area; and (d) each hospital in the Diocese's geographical area.
- vi. The Diocese shall send a letter to each parish located in the Diocese's geographical area requesting that such parish display either the Publication Notice or the Survivor Claim Notice in a prominent location within the church, school, or parish office. The letter shall also request that notices be published once a month in the parishes' weekly bulletins until the Claim Filing Deadline. The letter shall also request that each pastor, canonical administrator, or parochial vicar remind parishioners of the availability of information concerning the Claim Filing Deadline. The letter shall also request that parishes disseminate the Publication Notice or Survivor Claim Notice by e-mail to their respective distribution lists. The letter shall request confirmation as to whether the parish has complied with the publication request and shall request: (a) the dates of publication of the notices in the parish's bulletin; and (b) a copy of the parish bulletin including such notice.
- vii. The Diocese shall request that each pastor, canonical administrator, or parochial vicar read a letter from the Bishop at Masses at least two times before the Claim Filing Deadline. The letter from the Diocese

shall state that the Diocese requests that the letter be read, that the Claim Filing Deadline is April 4, 2025, that the Diocese requests that people inform their family members about the Claim Filing Deadline, and that the filing of a claim may be done confidentially.

20. In addition, Stretto shall post the component parts of the Sexual Abuse Claim Filing Package on Stretto's case website.

21. Interstate Fire & Casualty Company's ("Interstate") and London Market Insurers' consent to the terms of this Amended Final Order is based on the unique facts and circumstances presented and Interstate and London Market Insurers reserve their rights to contest the use of the terms of this Amended Final Order in any other proceeding if applied to Interstate or London Market Insurers, and this Amended Final Order is not a precedent or evidence that should be used in future cases or proceedings against Interstate or London Market Insurers.

22. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation and interpretation of this Amended Final Order.

April \_\_, 2026  
Burlington, Vermont

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Heather Z. Cooper  
United States Bankruptcy Judge