

ROMAN CATHOLIC CHURCH AD HOC COMMITTEE MEMORANDUM

To: Cardinals, Archbishops, Bishops and Administrators

From: Rodney W. Oligmueller, CPU, AIC, FLMI, Committee Chair

Date: February 26, 2022

Re: **Updates on Plan and New Opportunity to Cast Vote to Reject Plan**

Update re Plan and Schedule. On February 15, Boy Scouts filed a new plan. The primary change was to give most Chartered Organizations the same treatment Roman Catholic Chartered Organizations were already receiving as part of a settlement between Boy Scouts and the committees that represent survivor claimants. The Court moved the start of the confirmation trial from February 22 to March 14.

New Opportunity Vote on Plan. Because of the settlement and changes to the Plan, the Court reopened the voting deadline and is allowing votes to be cast or changed until March 4 at 4:00 eastern time.

No Change in Voting Recommendation. The Committee continues to recommend that Roman Catholic Chartered Organizations **vote to reject the Plan.**

The Committee urges all Roman Catholic Chartered Organizations that did not previously vote, or that voted to accept the Plan, to cast votes against the Plan. If you previously voted to reject the Plan, you do not need to do anything. Instructions follow on the next page.

No Change in Committee Position on Opposing Plan. The Plan, as previously discussed below, is a threat to insurance the Dioceses, Archdioceses and parishes purchased on their own behalf. It also seeks to take away all insurance Boy Scouts and the Local Councils purchased for the benefit of Catholic Chartered Organizations. Century Insurance has substantial insurance obligations to many Dioceses, Archdioceses and parishes in the United States and other insurers who settle with Boy Scouts may also have significant insurance obligations. The plan is designed to impair and eliminate those rights.

In addition, the Plan forces Roman Catholic Chartered Organizations to release the indemnity and contribution rights they have against Boy Scouts and the Local Councils, the parties who bear virtually all of the responsibility for Boy Scout abuse claims.

Finally, the Plan is designed to facilitate and encourage Scouting abuse survivors to pursue Roman Catholic Chartered Organizations in the tort system (and all other Chartered Organizations other than the Mormon Church and the United Methodist Church).

The result is the Roman Catholic Chartered Organizations are being abandoned to the tort system by the Boy Scouts and the Local Councils for Scouting abuse claims, while the Boy Scouts and Local Councils shed their liabilities and protect their own assets. Worse, the abandonment is accompanied by impairment and elimination of Roman Catholic Chartered Organizations' insurance rights.

Thank you for your assistance. If you have any questions, please do not hesitate to contact me or Committee counsel: Daniel Schufreider, Schiff Hardin LLP, 233 S. Wacker Dr., Suite 7100, Chicago, IL 60606. Email: dschufreider@schiffhardin.com. Telephone: 312.258.5669. Fax: 312.258.5600

To Cast a Ballot to Reject the Plan:

Roman Catholic Chartered Organizations may request a new Ballot from the Solicitation Agent, Omni Agent Solutions, at (a) bsaballots@omniagnt.com, or (b) calling the Boy Scouts' toll-free restructuring hotline at 866-907-2721, or (c) submitting an inquiry on the Debtors' restructuring website at <https://omniagentsolutions.com/BSA>. You must use the pre-populated Ballot from Omni Agent Solutions containing your unique ballot ID, name, and claim number in order to submit a Ballot. All materials and instructions regarding submitting a Ballot and Plan materials are available at no charge on Boy Scouts' case website at <https://omniagentsolutions.com/bsa-ballots>.

Ballots must be delivered to the Solicitation Agent (a) via the electronic Ballot submission platform on the Solicitation Agent's website (the "E-Ballot Platform") by visiting <https://omniagentsolutions.com/bsa-ballots> and following the instructions set forth on the website, or (b) at the address listed below. You are highly encouraged to submit your Ballot via the E-Ballot Platform. If you choose to submit your Ballot via the E-Ballot Platform, you should NOT submit a hard copy Ballot.

If by E-Ballot Platform:

<https://omniagentsolutions.com/bsa-ballots>

If by standard or overnight mail or personal delivery:

Boy Scouts of America Ballot Processing
c/o Omni Agent Solutions
5955 De Soto Avenue, Suite 100
Woodland Hills, CA 91367