# UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF NEW YORK

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The Diocese of Rochester,

Case No.: 19-20905 Chapter 11 Case

Debtor,

## NOTICE OF HEARING ON MOTION FOR ENTRY OF STIPULATION AND ORDER STAYING THE CONTINUED PROSECUTION OF CERTAIN LAWSUITS

**PLEASE TAKE NOTICE**, that on February 28, 2020, the above-captioned debtor and debtor in possession (the "<u>Debtor</u>"), by and through its undersigned counsel, moved (the "<u>Motion</u>") the United States Bankruptcy Court for the Western District of New York (the "<u>Court</u>") for entry of a stipulation and order staying the continued prosecution of certain lawsuits pursuant to 11 U.S.C. § 105(a), and granting related relief.

PLEASE TAKE FURTHER NOTICE, that any objections or responses to the Motion must be in writing, conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Western District of New York and be filed with the Court and served so as to be actually received by no later than March 16, 2020 (prevailing Eastern Time) (the "Objection Deadline") by the following parties: (a) the Debtor, The Diocese of Rochester, Attn: Lisa Passero, CFO, 1150 Buffalo Road, Rochester, New York 14624; (b) counsel to the Debtor, Bond, Schoeneck & King, PLLC, One Lincoln Center, Syracuse, New York 13202, Attn: Stephen A. Donato and Charles J. Sullivan; (c) counsel to the Official Committee of Unsecured Creditors, Pachulski, Stang, Zeiehl & Jones LLP, 10100 Santa Monica Boulevard, 13<sup>th</sup> Floor, Los Angeles, California 90067-4003, Attn: James I. Stang; (d) counsel for any additional Committees that may be hereafter appointed; (e) the Office of the United States Trustee for the Western District of New York, 100 State Street, Room 609, Rochester, New York 14614, Attn: Kathleen D. Schmitt, and (f) those persons who have formally appeared and requested service in this case pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure.

PLEASE TAKE FURTHER NOTICE, that a hearing to consider the Motion and any objections related thereto will be held on March 19, 2020 at 11:00 a.m. (prevailing Eastern time), or as soon thereafter as counsel may appear and be heard, before the Honorable Paul R. Warren, United States Bankruptcy Judge for the Western District of New York, or such other judge as may be sitting in his stead at the United States Courthouse, 100 State Street, Rochester, New York 14614.

Dated: February 28, 2020 BOND, SCHOENECK & KING, PLLC

By: /s/ Stephen A. Donato

Stephen A. Donato, Esq. Charles J. Sullivan, Esq. Grayson T. Walter, Esq. One Lincoln Center

Syracuse, NY 13202

Telephone: (315) 218-8000 Facsimile: (315) 218-8100 Emails: <a href="mailto:sdonato@bsk.com">sdonato@bsk.com</a> <a href="mailto:sdonato@bsk.com">csullivan@bsk.com</a> <a href="mailto:gwalter@bsk.com">gwalter@bsk.com</a>

Attorneys for The Diocese of Rochester

# UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF NEW YORK

In re:

Case No. 19-20905

The Diocese of Rochester,

Chapter 11

Debtor.

# MOTION FOR ENTRY OF STIPULATION AND ORDER STAYING THE CONTINUED PROSECUTION OF CERTAIN LAWSUITS

The Diocese of Rochester, the debtor and debtor in possession in the above-captioned chapter 11 case (the "<u>Debtor</u>"), by and through its undersigned counsel, hereby moves the Court (this "<u>Motion</u>") for entry of a stipulation and order in the form attached hereto as <u>Exhibit A</u> (the "<u>Stipulation and Order</u>") staying the continued prosecution of certain lawsuits pursuant to 11 U.S.C. § 105(a). In further support of the Motion, the Debtor respectfully represents as follows:

## **JURISDICTION**

- 1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1334(b).
- 2. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A) and (O), and the Court may enter a final order consistent with Article III of the United States Constitution.
  - 3. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.
- 4. The statutory and rule-based predicates for the relief requested herein are section 105(a) of title 11 of the United States Code (11 U.S.C. §§ 101 *et seq.*, the "Bankruptcy Code") and Rule 7001 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules").

## **BACKGROUND**

5. On September 12, 2019 (the "<u>Petition Date</u>"), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code with the United States Bankruptcy Court for the Western District of New York (the "<u>Bankruptcy Court</u>"), commencing the Debtor's chapter 11

case (this "Chapter 11 Case"). The Debtor continues to operate its business and manage its

properties as debtor in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

No request for a trustee or examiner has been made in this Chapter 11 Case. On September 26,

2019, the Office of the United States Trustee filed notice of the appointment of an official

committee of unsecured creditors pursuant to section 1102 of the Bankruptcy Code (the

"Committee"). As of the date of the filing of this Motion, no other official committees have been

appointed or designated.

6. The Committee consists of nine individuals who allege that the Debtor and/or one

or more of the Stay Defendants (as defined below) are liable on account of sexual abuse perpetrated

against such individuals, and who have asserted claims against the Debtor and/or the Stay

Defendants that, prior to and but for the enactment of the New York Child Victims Act, were

barred by the applicable statute of limitations (each, a "CVA Action"). Each Committee member

is represented by his or her own individual counsel (each, a "State Court Attorney") in this Chapter

11 Case and their respective CVA Actions. The State Court Attorneys also represent numerous

claimants who either have commenced or, but for the automatic stay, could commence, actions

seeking to hold the Debtor and/or the Stay Defendants liable for claims of abuse.

7. Attached as Schedule 1 to the Stipulation and Order is a list of CVA Actions filed

against the Debtor and/or Stay Defendants to date. The Debtor and the Committee anticipate that

additional lawsuits will be commenced against the Stay Defendants. The Debtor and the

Committee intend to add such lawsuits to the list of stayed CVA Actions in accordance with the

Stipulation and Order.

8. Although the CVA Actions are stayed by operation of 11 U.S.C. § 362(a) to the

extent they seek relief against the Debtor, the plaintiffs in the CVA Actions contend that the

automatic stay provided by the Bankruptcy Code does not prohibit them from pursuing claims against any non-debtor defendants, subject to compliance with applicable rules of civil procedure. Nevertheless, the Debtor and the Committee, in consultation with the State Court Attorneys, agree that a stay of the CVA Actions (pursuant to the terms of the Stipulation and Order) with respect to those non-debtor defendants listed on Schedule 2 to the Stipulation and Order (collectively, the "Stay Defendants") could promote the efficient resolution of both the CVA Actions and this Chapter 11 Case. The Stay Defendants include parishes, certain Catholic schools and other Catholic entities for which (a) the Bishop of Rochester serves as the President or (b) such entity has a sole member and the Bishop of Rochester serves as President of such sole member.

9. The Debtor and the Committee seek to undertake an orderly process that will allow all interested parties to understand the scope of CVA Actions (including any CVA Action that will be filed in the future). Rather than seeking to have the Court determine whether the automatic stay extends, or should pursuant to 11 U.S.C § 105(a) be extended on a nonconsensual basis, to the prosecution of CVA Actions against the Stay Defendants, the parties have agreed to the Stipulation and Order. Although the Stipulation and Order provides for a stay through February 29, 2020, the Debtor has received verbal agreement from the Committee for an extension through and including March 31, 2020, with the possibility of additional future extensions. The Debtor intends to prepare and file an Extension Notice (as defined in the Stipulation and Order). The Stipulation and Order will provide a breathing spell for all parties in interest to assess the CVA Actions while also providing a mechanism for additional CVA Actions to be filed against the Stay Defendants in an orderly manner. In that regard, pending actions against Stay Defendants will be stayed pursuant to the Stipulation and Order. New actions may be commenced against the Stay Defendants but they shall be immediately stayed pursuant to the terms of the Stipulation and Order.

#### RELIEF REQUESTED

10. By this Motion, the Debtor seeks entry of an agreed order pursuant to section 105(a) of the Bankruptcy Code approving the Stipulation and Order in the form attached hereto as **Exhibit A** and incorporated herein by reference for all purposes.

## **BASIS FOR RELIEF REQUESTED**

- order, process or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code]." 11 U.S.C. § 105(a). "Though section 105(a) does not give the bankruptcy court carte blanche—the court cannot, for example, take an action prohibited by another provision of the Bankruptcy Code—it grants the extensive equitable powers that bankruptcy courts need in order to be able to perform their statutory duties." *In re Caesars Entertainment Operating Co.*, *Inc.*, 808 F.3d 1186, 1188 (7th Cir. 2015) (internal citations omitted).
- 12. In this case, the relief contemplated in the Stipulation and Order is warranted as the signatories to the Stipulation and Order have agreed that it should be entered and because it will aid the Debtor's efforts to reorganize by providing a breathing spell for all parties in interest to assess the CVA Actions as well as issues relating to potential insurance coverage for any claims that may underlie the CVA Actions. The Committee, through its counsel, consulted with counsel to many, if not the overwhelming majority, of CVA Actions that have been asserted against the Debtor and Stay Defendants to date, and they support the proposed Stipulation and Order. The Stipulation and Order also contemplates production of documents to the Committee by the Debtor as a means of moving the Chapter 11 Case forward without formal discovery. The Debtor and the Committee believe that the stay under the terms of the Stipulation and Order will allow parties to address issues necessary to resolution of the Debtor's Chapter 11 Case in an orderly manner.

**NOTICE** 

13. Notice of this Motion will be given to (i) the Office of the United States Trustee for

the Western District of New York, (ii) counsel for the Committee (iii) counsel to any person that

filed a CVA Action as of the date hereof, (iv) counsel for all Stay Defendants, (v) all required

governmental agencies, (vi) each Insurer (as defined in the Stipulation and Order) and (vii) all

parties who have formally appeared in this Chapter 11 Case and requested notice in accordance

with Rule 2002 of the Federal Rules of Bankruptcy Procedure. In light of the nature of the relief

requested herein, the Debtor respectfully submits that further notice of this Motion is neither

required nor necessary.

WHEREFORE, the Debtor respectfully requests that the Court enter the agreed Stipulation

and Order substantially in the form annexed hereto as **Exhibit A** and grant such further relief as

the court may deem just and proper.

Dated: February 28, 2020

BOND, SCHOENECK & KING, PLLC

By:/s/ Stephen A. Donato

Stephen A. Donato

Charles J. Sullivan

Grayson T. Walter

One Lincoln Center

Syracuse, NY 13202-1355

Telephone: (315) 218-8000

sdonato@bsk.com

csullivan@bsk.com

gwalter@bsk.com

Attorneys for the Diocese of Rochester

## Exhibit A

Agreed Stipulation and Order

UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF NEW YORK

In re:

Case No. 19-20905

The Diocese of Rochester,

Chapter 11

Debtor.

AGREED STIPULATION AND ORDER PURSUANT TO 11 U.S.C. § 105(a) STAYING CONTINUED PROSECUTION OF CERTAIN LAWSUITS

This matter came before the Court on the *Motion For Entry of a Stipulation and Order Staying the Continued Prosecution of Certain Lawsuits* (the "Motion"), filed by The Diocese of Rochester as debtor and debtor in possession (the "Debtor"); the Court finding that (i) it has jurisdiction over this matter pursuant to 28 U.S.C. §1334; (ii) this matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(A) and (O); (iii) the relief requested in the Motion is in the best interests of the Debtor, its estate, and creditors; and (iv) after due deliberation, and good and sufficient cause appearing therefor, the Court hereby determines that the relief requested in the Motion should be granted;

NOW, THEREFORE, IT IS HEREBY FOUND, STIPULATED AND AGREED AS FOLLOWS:

A. Attached hereto as Schedule 1 is a list of lawsuits or claims (collectively, the "CVA Actions") against the Debtor and/or various third-parties set forth on Schedule 2 attached hereto (collectively, the "Stay Defendants") which (a) were pending as of the Petition Date or (b) have been filed or otherwise asserted against Stay Defendants on or after the Petition Date, alleging that the Debtor and/or the named Stay Defendants are liable to the applicable plaintiff on account of sexual abuse perpetrated against such plaintiff.

<sup>&</sup>lt;sup>1</sup> Capitalized terms used but not defined herein shall have the meanings and definitions ascribed to them in the Motion.

B. Although the CVA Actions are stayed by operation of 11 U.S.C. § 362(a) to the extent they seek relief against the Debtor, the plaintiffs in the CVA Actions assert that the automatic stay does not, subject to compliance with applicable rules of civil procedure, prohibit them from pursuing their claims against any non-debtor defendant(s).

C. The Debtor and the Committee, in consultation with the State Court Attorneys, have agreed to stay the CVA Actions against the Stay Defendants in accordance with the terms set forth in this Stipulation and Order.

#### AND IT IS THEREFORE ORDERED AND AGREED THAT:

- 1. Pursuant to 11 U.S.C. § 105(a), except to the limited extent provided below, the CVA Actions set forth on Schedule 1 are hereby stayed as to the Stay Defendants and any and all further proceedings under the CVA Actions, or other actions by the parties thereto in furtherance of their prosecution, are hereby stayed from the date hereof (the "Effective Date") through and including 11:59 p.m. (prevailing Eastern time) on February 29, 2020 (the "Termination Date").
- 2. Subject to Sections 4 and 5 below, prior to the occurrence of the Termination Date, no person shall prosecute against any Stay Defendant any action alleging claims substantially similar to those asserted by such plaintiff in a pending CVA Action, nor shall any plaintiff seek to sever his or her claims against the Debtor in any CVA Action in order to proceed with such CVA Action against any Stay Defendant.
- 3. Prior to the occurrence of the Termination Date, no Stay Defendant shall take any action against a signatory to this Stipulation and Order in any CVA Action, including without limitation, seeking discovery or dismissal of the CVA Action. Nothing herein shall preclude a Stay Defendant from answering a complaint in a CVA Action, but any obligation to do so shall be tolled pursuant to Section 6 below.

- 4. The stay imposed by this Stipulation and Order shall not prohibit or enjoin the filing of a complaint for purposes of commencing a CVA Action against, or service of a complaint related to any CVA Action upon, any of the Stay Defendants or any other non-debtor defendant, including service of a complaint in any CVA Action filed prior to the Effective Date. Any stay pursuant to this Stipulation and Order or 11 U.S.C. § 362 (to the extent applicable) is hereby lifted to the limited extent necessary to (i) allow any person to file and serve a CVA Action against a Stay Defendant, as well as to file and serve any proof of service therefor, and (ii) to allow any Stay Defendant or the Debtor to tender the defense of any CVA Actions or similar claims to any insurance carrier who may have provided coverage with respect to the claim at issue (each, an "Insurer"); provided, however, that nothing herein is intended to authorize any payment by an Insurer to or on behalf of a Stay Defendant if doing so would serve to reduce the amount of insurance coverage available to the Debtor.
- 5. For those Stay Defendants identified as a "parish" on Schedule 2, service of a complaint filed in any CVA Action may be effected by any plaintiff against such Stay Defendants by serving such complaint upon Woods Oviatt Gilman LLP, 1900 Bausch & Lomb Place, Rochester, New York 14604, Attn: Timothy P. Lyster, Esq. Service of complaints filed in any CVA Action against Catholic Charities of the Diocese of Rochester, Catholic Youth Organization of Catholic Charities of the Diocese of Rochester, Camp Stella Maris of the Diocese of Rochester (a/k/a Camp Stella Maris of Livonia, N.Y), Villa of Hope (f/k/a St. Joseph's Villa), or Providence Housing Development Corporation may be effected by serving such complaint upon their counsel Ward Greenberg Heller & Reidy LLP, 1800 Bausch & Lomb Place, Rochester, New York 14604, Attn: Eric Ward, Esq. Service of complaints filed in any CVA Action against St. Bernard's School of Theology and Ministry may be effected by any signatory to this Stipulation and Order by serving

such complaint upon Adams LeClair LLP, 28 East Main Street, Ste. 1500, Rochester, New York, 14614. Attn: Paul L. Leclair, Esq. Any plaintiff commencing or serving a CVA Action shall provide copies of the complaint via email to each of the undersigned counsel to the Debtor and the Committee on the same date as service of the complaint pursuant to this Section 5 or within three (3) business days of service of this Stipulation and Order upon such person.

- 6. The period beginning on the Effective Date and ending on the Termination Date (the "Standstill Period") shall not be included in computing the running of any time periods with respect to any (i) deadline to file an answer, motion to dismiss, or other responsive pleading, (ii) deadline to make or respond to dispositive motions or discovery demands, (iii) deadline to seek removal of an action to federal court, or (iv) other time deadlines (whether statutory, rule-based, equitable, contractual, or otherwise) relating to the prosecution or defense of the CVA Actions, such that all claims, defenses, rights and privileges with respect thereto shall be preserved and remain viable to the same extent that they existed as of the Effective Date, provided, however, that the foregoing shall not be deemed to extend or waive any applicable statutes of limitations, statutes of repose, laches or estoppel periods or other time deadlines or defenses relating to the initial assertion of a claim or filing of a CVA Action, and provided further that, upon the occurrence of the Termination Date, all Stay Defendants shall have not less than forty-five (45) days to file their initial answer, motion to dismiss, or other responsive pleading(s) in any CVA Action in which they are named.
- 7. The Standstill Period shall not apply to any potential defendant that is not a Stay Defendant listed on Schedule 2 hereto. Additional defendants may be added to Schedule 2 hereto only with consent of the Debtor and the Committee. Except to the extent they are included on Schedule 2 hereto, no defendant in a CVA Action may be deemed a beneficiary of this Stipulation

and Order without written consent of the Debtor and the Committee. Within ten business days of the addition of any defendant to Schedule 2, the Debtor shall file an amended Schedule 2 on the docket of the Chapter 11 Case.

- 8. Approximately every thirty (30) days after the Effective Date, the Debtor shall file an amended Schedule 1, which will include additional CVA Actions subject to this Stipulation and Order, on the Docket of the Chapter 11 Case; *provided, however*, that such schedule shall identify any plaintiff only as set forth in their complaint (by pseudonym where applicable), and by counsel to the plaintiff and the Index Number or case number of the case.
- 9. The Termination Date may be extended by mutual agreement between the Debtor and the Committee, which shall be memorialized in a stipulation filed with the Court (an "Extension Notice") and served on all plaintiffs to CVA Actions (through their counsel of record in any CVA Action) and any other party that was served with notice of the Motion. Any plaintiff in a CVA Action may object to the application of such extension of the Termination Date to such plaintiff's CVA Action by filing with the Bankruptcy Court, within ten (10) business days of the date of an Extension Notice, an objection setting forth the basis for its objection(s) to the Extension Notice (an "Extension Objection"). Upon filing of an Extension Objection by any plaintiff (an "Objecting Party"), the Termination Date with respect to such Objecting Party's CVA Action shall be extended through and including the later of (a) the Termination Date (without giving effect to the extension set forth in the Extension Notice) and (b) date on which the Bankruptcy Court enters an Order regarding the Extension Objection. An Objecting Party shall serve any Extension Objection on the undersigned counsel to the Committee, the undersigned counsel to the Debtor and counsel to any affected Stay Defendant or their counsel of record. Notwithstanding the filing of an Extension Objection, the Termination Date shall be

extended as to any plaintiff who does not object to the Extension Notice.

10. The entry of this Stipulation and Order is without prejudice to the rights of the

Debtor to enforce the terms of this Stipulation and Order, including through an injunction under

11 U.S.C. § 105(a), against any plaintiff that does not comply with the terms of this Stipulation

and Order. Nothing herein shall be construed to limit the rights of the Debtor to seek relief similar

to the relief provided in this Stipulation and Order, including through an injunction under 11 U.S.C.

§ 105(a), against any party. In the event the Debtor takes any action seeking such an injunction

on terms substantially similar to those set forth in this Stipulation and Order prior to the

Termination Date, the Committee shall support such requested relief; provided, however, that

nothing herein shall be construed to restrict or prohibit the rights of any party to oppose an

extension of the Termination Date; and provided further that nothing herein shall be construed to

restrict or prohibit the rights of the Committee or any plaintiff in a CVA Action to oppose any

effort by the Debtor or any Stay Defendant(s) after the Termination Date to stay or enjoin any

CVA Action. Nothing in the Motion or this Stipulation and Order shall be construed as an

admission by the Committee or any plaintiff regarding any efforts by the Debtor or any Stay

Defendant to obtain an order enforcing the automatic stay or enjoining prosecution of any CVA

Action after the Termination Date.

11. Subject to the Committee's execution of a confidentiality and non-disclosure

agreement in form and substance acceptable to the Debtor, during the Standstill Period the Debtor

agrees to use commercially reasonable, good faith efforts to promptly provide the Committee

documents in its possession responsive to the document requests described on Schedule 3 hereto,

subject to the Debtor's right to raise reasonable objections based upon scope, relevance and

privilege; provided, however, that as the Debtor has submitted documents responsive to Request

No. 44 on Schedule 3 to a third-party redaction company for redaction of certain personal

information (the "Redacted Documents"), the Debtor shall produce the Redacted Documents to

the Committee no later than fourteen (14) days after receipt of the Redacted Documents back from

the redaction company. This date may be extended by consent of the Committee or by Order of

the Court for good cause shown. The Debtor shall notify the Committee when the Debtor receives

the Redacted Documents back from the redaction company. This Section 11 shall be enforceable

by the Committee even if the Bankruptcy Court does not enter an Order approving this Stipulation

and Order.

12. The Debtor shall not object to a request by the Committee to conduct a Bankruptcy

Rule 2004 Exam of Bishop Emeritus Matthew Harvey Clark for deposition. This Section 12 shall

remain effective notwithstanding the occurrence of the Termination Date without extension or the

termination or expiration of this Stipulation and Order.

13. Nothing in this Stipulation and Order is intended or shall be deemed to constitute

any admission or acknowledgement of any fact, conclusion of law, potential liability or liability

of any party, nor does this Stipulation and Order constitute a waiver by any party of any time-

based defenses, except to the extent any otherwise applicable deadlines may be tolled during the

Standstill Period as provided herein. Except as otherwise provided herein, all parties shall be

deemed to reserve all available rights, remedies, claims and defenses without waiver.

14. Until such time as the Court either (a) approves and enters this Stipulation and

Order, or (b) denies the relief requested in the Motion, the parties hereto shall abide by, and

conduct themselves in accordance with, the agreements, terms and conditions hereof as if same

had been approved by the Court.

15. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this

Stipulation and Order are immediately effective and enforceable upon its entry.

- 16. The Debtor is authorized to file a copy of this Stipulation and Order (including any amended Schedules thereto) with any court in which a CVA Action is or may hereafter become pending as proof that such action is stayed and enjoined as set forth herein.
- 17. Nothing herein shall be construed to limit or affect any party's right to seek appropriate relief from this Court to the extent necessary to respond to any actions by a court in which a CVA Action is pending that, but for the stay provided herein, would require a party to act before the Termination Date.
- 18. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation and/or enforcement of this Stipulation and Order.

Dated: \_\_\_\_\_\_, 2020
Rochester, New York
Hon. Paul R. Warren
United States Bankruptcy Judge

STIPULATED AND AGREED TO BY:

BOND, SCHOENECK & KING, PLLC

By:
Stephen A. Donato
Charles J. Sullivan

Grayson T. Walter One Lincoln Center

Syracuse, NY 13202-1355 Telephone: (315) 218-8000

sdonato@bsk.com csullivan@bsk.com gwalter@bsk.com

- and -

HARRIS BEACH PLLC

PACHULSKI STANG ZIEHL & JONES LLP

James I. Stang (pro hac vice pending)

10100 Santa Monica Blvd., 13<sup>th</sup> Floor

Los Angeles, CA 90067 Telephone: (310) 277-6910

jstang@pszjlaw.com

Ilan D. Scharf 780 Third Avenue, 34<sup>th</sup> Floor New York, NY 10017 Telephone: (212) 561-7700

Telephone: (212) 561-770 ischarf@pszilaw.com

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Attorneys for the Official Committee of

By: Mily & Spelle

Unsecured Creditors

Philip G. Spellame 99 Garnsey Road Pittsford, NY 14534

Telephone: (585) 419-8800 pspellane@harrisbeach.com

Attorneys for the Diocese of Rochester

## Schedule 1

## **CVA** Actions

| S&C Date<br>Filed with<br>County Clerk | Supreme<br>Court in<br>Identified<br>County | Index<br>Number            | Defendant(s)   | Opposing counsel                   |
|--|---|----------------------------|--|------------------------------------|
| 8/19/2019 10/29/2019                   | Monroe<br>Monroe                            | E2019007874<br>E2019010180 | Roman Catholic Diocese of Rochester, and St. Patrick Parish  St. Bridget's Church, aka St. Bridget's Church Rochester; Immaculate Conception/St. Bridget Church Society; St. Anthony's Church of Elmira, New York; Blessed Sacrament Roman Catholic Church of Elmira, NY aka Blessed Sacrament Roman Catholic Church of Elmira, NY; The Parish of The Most Holy Name of Jesus, Chemung County, NY; St. Francis of Assisi Church of Rochester, NY; St. Salome Church; Kateri Tekakwitha Roman Catholic Parish, Monroe County, NY; Catholic Charities of The Diocese of Rochester; and the Catholic Youth Organization of Catholic Charities of the Diocese of Rochester | McGuire/Foote<br>Hanley/Garabedian |
| 8/26/2019                              | Monroe                                      | E2019008111                | Roman Catholic Diocese of Rochester  | McGuire/Foote                      |
| 8/14/2019                              | Monroe                                      | E2019007694                | Diocese of Rochester; St. Christopher's Church; St. Bridget's Church; St. Leo the Great Catholic Church; St. Francis Xavier Church; St. Bridget's Church and School; Good Shepherd Parish and School; Holy Rosary Church and School; St. Boniface Church and School; St. Mary of the Assumption; and Church of the Annunciation  | Pfau                               |
| 1/14/2020                              | Monroe                                      | E2020000525                | St. Bridget's Church, aka St. Bridget's Church Rochester; Immaculate Conception/St. Bridget Church Society; St. Anne's Roman Catholic Society, Palmyra; The Parish of St. Katharine Drexel, Wayne County NY; St. Anthony's Church of Elmira, NY; Blessed Sacrament Roman Catholic Church of Elmira, NY, aka Blessed Sacrament Roman Catholic Church of Elmira, NY; The Parish of the Most Holy Name of Jesus, Chemung County, NY; St. Francis of Assisi Church of Rochester, NY; St. Salome Church; and Kateri Tekakwitha Roman Catholic Parish, Monroe County, NY   | Hanley/Garabedian                  |
| 8/14/2019                              | Monroe                                      | E2019007700                | The Diocese of Rochester; St. Theodore Catholic Church, aka St. Theodore   | Anderson/Boyd                      |
| 8/14/2019                              | Monroe                                      | 1                          | Diocese of Rochester; St. Christopher's Church; St. Bridget's Church; St. Leo the Great Catholic Church; St. Francis Xavier Church; St. Bridget's Church and School; Good Shepherd Parish and School; Holy Rosary Church and School; St. Boniface Church and School; St. Mary of the Assumption; and Church of the Annunciation  | Pfau                               |
| 8/14/2019                              | Monroe                                      |                            | The Diocese of Rochester; St. John the Evangelist Church of Greece aka St. John the Evangelist aka St. John Evangelist   | Anderson/Reck                      |

| 10/30/2019 | Monroe | E2019010252 | St. Bridget's Church, aka St. Bridget's Church Rochester; Immaculate Conception/St. Bridget Church Society; St. Anthony's Church of Elmira, New York; Blessed Sacrament Roman Catholic Church of Elmira, NY aka Blessed Sacrament Roman Catholic Church of Elmira, NY: The Parish of The Most Holy Name of Jesus, Chemung County, NY; St. Francis of Assisi Church of Rochester, NY; St. Salome Church; Kateri Tekakwitha Roman Catholic Parish, Monroe County, NY; Catholic Charities of the Diocese of Rochester; and the Catholic Youth Organization of Catholic Charities of the Diocese of Rochester | Hanley/Garabedian |
|------------|--------|-------------|---|-------------------|
| 8/14/2019  | Monroe | E2019007699 | The Diocese of Rochester; Sisters of Mercy, aka and dba Sisters of Mercy of the Americas, aka and dba Sisters of Mercy of the Americas - New York, Pennsylvania, Pacific West Community, Inc., fka Congregation of the Sisters of Mercy and Motherhouse of the Sisters of Mercy   | Anderson/Boyd     |
| 12/9/2019  | Monroe | E2019011543 | St. Mary's Catholic Church German of Dansville, NY; Holy Family Catholic Community; St. Patrick Church of Oswego, NY; Blessed Trinity and St. Patrick Parish; St. Cecilia Church of Irondequoit, NY; Kateri Tekakwitha Roman Catholic Parish, Monroe County, NY   | Hanley/Garabedian |
| 8/14/2019  | Monroe | E2019007702 | The Diocese of Rochester  | Anderson/Boyd     |
| 12/23/2019 | Monroe | E2019011989 | St. Bridget's Church, aka St. Bridget's Church Rochester; Immaculate Conception/St. Bridget Church Society; St. Anthony's Church of Elmira, New York; Blessed Sacrament Roman Catholic Church of Elmira, NY aka Blessed Sacrament Roman Catholic Church of Elmira, NY; The Parish of The Most Holy Name of Jesus, Chemung County, NY; St. Francis of Assisi Church of Rochester, NY; St. Salome Church; Kateri Tekakwitha Roman Catholic Parish, Monroe County, NY; Catholic Charities of the Diocese of Rochester; and the Catholic Youth Organization of Catholic Charities of the Diocese of Rochester | Hanley/Garabedian |
| 12/23/2019 | Monroe |             | St. Patrick's Roman Catholic Church Society of Owego, NY; Sacred Heart Church of<br>Auburn, NY; and Church of St. John the Evangelist, aka Church of St. John the<br>Evangelist, Spencerport, Monroe County, NY   | Hanley/Garabedian |
| 8/14/2019  | Monroe |             | The Diocese of Rochester aka Roman Catholic Diocese of Rochester; Roman Catholic Parish of St. Frances Xavier Cabrini, Rochester NY (formerly "St. Philip Neri Church of Rochester, NY", a religious corporation)   | James             |
| 8/14/2019  | Monroe |             | The Diocese of Rochester aka Roman Catholic Diocese of Rochester; Roman<br>Catholic Parish of St. Frances Xavier Cabrini, Rochester NY (formerly St. Andrews<br>Roman Catholic Church of Rochester NY)  | James             |
| 11/15/2019 | Monroe |             | Church of the Transfiguration Parish and DOES 1-5 whose identities are unknown to Plaintiff   | Greenstein        |

| 8/14/2019  | Monroe | E2019007693 | Diocese of Rochester, St. Mary's Church, and Our Lady of the Lakes   | Merson            |
|------------|--------|-------------|--|-------------------|
| 12/9/2019  | Monroe | E2019011545 | St. Mary's Catholic Church German of Dansville, NY; Holy Family Catholic Community; St. Patrick Church of Oswego, NY; Blessed Trinity and St. Patrick Parish; St. Cecilia Church of Irondequoit, NY; Kateri Tekakwitha Roman Catholic Parish, Monroe County, NY  | Hanley/Garabedian |
| 12/9/2019  | Monroe | E2019011541 | St. Mary's Catholic Church German of Dansville, NY; Holy Family Catholic Community; St. Patrick Church of Oswego, NY; Blessed Trinity and St. Patrick Parish; St. Cecilia Church of Irondequoit, NY; Kateri Tekakwitha Roman Catholic Parish, Monroe County, NY  | Hanley/Garabedian |
| 9/12/2019  | Monroe | E2019008707 | The Diocese of Rochester; Saint Gregory's Roman Catholic Church of Marion, New York; and The Parish of St. Katharine Drexel, Wayne County, New York  | Hanley/Garabedian |
| 8/14/2019  | Monroe | E2019007710 | The Diocese of Rochester; St. Patrick's; Most Holy Name of Jesus   | Anderson/Boyd     |
| 11/19/2019 | Monroe | E2019010928 | (Basilian Fathers and Aquinas High School; no DOR affiliated defendants)   | Herman            |
| 8/14/2019  | Monroe | E2019007745 | Roman Catholic Diocese of Rochester  | McGuire/Foote     |
| 8/14/2019  | Monroe | E2019007705 | The Diocese of Rochester   | Anderson/Reck     |
| 8/14/2019  | Monroe | E2019007703 | The Diocese of Rochester; Nativity of the Blessed Virgin Mary, aka Church of Nativity of the Blessed Virgin Mary; Sisters of St. Joseph (Rochester), aka Sisters of Saint Joseph of Rochester, aka Sisters of St. Joseph; and Does 1-5 whose identities  | Anderson/Reck     |
| 8/14/2019  | Monroe | E2019007717 | are unknown to Plaintiff The Diocese of Rochester; St. John Evangelist, aka St. John the Evangelist, aka St. John the Evangelist Greece  | Bansbach          |
| 8/14/2019  | Monroe |             | Diocese of Rochester; St. Christopher's Church; St. Bridget's Church; St. Leo the Great Catholic Church; St. Francis Xavier Church; St. Bridget's Church and School; Good Shepherd Parish and School; Holy Rosary Church and School; St. Boniface Church and School; St. Mary of the Assumption; and Church of the Annunciation  | Pfau              |
| 12/23/2019 | Monroe |             | St. Bridget's Church, aka St. Bridget's Church Rochester; Immaculate Conception/St. Bridget Church Society; St. Anthony's Church of Elmira, New York; Blessed Sacrament Roman Catholic Church of Elmira, NY aka Blessed Sacrament Roman Catholic Church of Elmira, NY; The Parish of the Most Holy Name of Jesus, Chemung County, NY; St. Frances of Assisi Church of Rochester, NY; St. Salome Church; and Kateri Tekakwitha Roman Catholic Parish, Monroe County, NY | Hanley/Garabedian |

| 8/14/2019 | Monroe  | E2019007709 | The Diocese of Rochester; St. John the Evangelist aka St. John Evangelist aka St. John the Evangelist Parish aka St. John the Evangelist Greece a Parish of the Roman Catholic Diocese of Rochester; Church of the Annunciation aka Annunciation Church; St. Frances Xavier Cabrini aka and dba Roman Catholic Parish of St. Frances Xavier Cabrini aka St. Frances Xavier Cabrini Parish and Does 1-5 whose identities are unknown to Plaintiff  | Anderson/Boyd     |
|-----------|---------|-------------|---|-------------------|
| 8/14/2019 | Monroe  | E2019007694 | Diocese of Rochester; St. Christopher's Church; St. Bridget's Church; St. Leo the Great Catholic Church; St. Francis Xavier Church; St. Bridget's Church and School; Good Shepherd Parish and School; Holy Rosary Church and School; St. Boniface Church and School; St. Mary of the Assumption; and Church of the Annunciation   | Pfau              |
| 12/9/2019 | Monroe  | E2019011533 | St. Mary's Catholic Church German of Dansville, NY; Holy Family Catholic Community; St. Patrick Church of Oswego, NY; Blessed Trinity and St. Patrick Parish; St. Cecilia Church of Irondequoit, NY; Kateri Tekakwitha Roman Catholic Parish, Monroe County, NY   | Hanley/Garabedian |
| 8/14/2019 | Monroe  | E2019007694 | Diocese of Rochester; St. Christopher's Church; St. Bridget's Church; St. Leo the Great Catholic Church; St. Francis Xavier Church; St. Bridget's Church and School; Good Shepherd Parish and School; Holy Rosary Church and School; St. Boniface Church and School; St. Mary of the Assumption; and Church of the Annunciation   | Pfau              |
| 8/19/2019 | Monroe  | E2019007874 | Roman Catholic Diocese of Rochester, and St. Patrick Parish   | McGuire/Foote     |
| 8/19/2019 | Monroe  | E2019007874 | Roman Catholic Diocese of Rochester, and St. Patrick Parish   | McGuire/Foote     |
| 8/19/2019 | Monroe  | E2019007874 | Roman Catholic Diocese of Rochester, and St. Patrick Parish   | McGuire/Foote     |
| 8/26/2019 | Chemung | 2019-5256   | Roman Catholic Diocese of Rochester, Parish of the Most Holy Name of Jesus, St. Mary Church in Elmira, New York, Bishop Joseph Lloyd Hogan, Individually and in his capacity as a Roman Catholic Priest in the Diocese of Rochester, and Bishop Emeritus Matthew Harvey Clark, Individually and in his capacity as a Roman Catholic Priest in the Diocese of Rochester  | Smith             |
| 12/9/2019 | Monroe  |             | St. Bridget's Church, aka St. Bridget's Church Rochester; Immaculate Conception/St. Bridget Church Society; St. Anthony's Church of Elmira, New York; Blessed Sacrament Roman Catholic Church of Elmira, NY aka Blessed Sacrament Roman Catholic Church of Elmira, NY; the Parish of The Most Holy Name of Jesus, Chemung County, NY; St. Frances of Assisi Church of Rochester, NY; St. Salome Church; Kateri Tekakwitha Roman Catholic Parish, Monroe County, NY; Catholic Charities of The Diocese of Rochester; and The Catholic Youth Organization of Catholic Charities of The Diocese of Rochester | Hanley/Garabedian |
| 8/14/2019 | Monroe  |             | Diocese of Rochester; St. Christopher's Church; St. Bridget's Church; St. Leo the Great Catholic Church; St. Francis Xavier Church; St. Bridget's Church and School; Good Shepherd Parish and School; Holy Rosary Church and School; St. Boniface Church and School; St. Mary of the Assumption; and Church of the Annunciation   | Pfau              |
| 8/14/2019 | Monroe  | 1           | The Diocese of Rochester aka Roman Catholic Diocese of Rochester; Church of the Nativity of the Blessed Virgin Mary   | James             |

| Monroe | E2019007875  | Roman Catholic Diocese of Rochester   | McGuire/Foote   |
|--------|--|---|---|
| Monroe | E2019007697  | The Diocese of Rochester; St. Theodore Catholic Church, aka St. Theodore; and Does 1-5 whose identities are unknown to Plaintiff  | Anderson/Reck   |
| Monroe | E2019007720  | The Diocese of Rochester; St. Boniface, aka Southeast Rochester Catholic Community; and Does 1-5 whose identities are unknown to Plaintiff  | Bansbach  |
| Monroe | E2019011098  | St. Bridget's Church, aka St. Bridget's Church Rochester; Immaculate Conception/St. Bridget Church Society; St. Anthony's Church of Elmira, New York; Blessed Sacrament Roman Catholic Church of Elmira, NY aka Blessed Sacrament Roman Catholic Church of Elmira, NY; The Parish of The Most Holy Name of Jesus, Chemung County, NY; St. Francis of Assisi Church of Rochester, NY; St. Salome Church; Kateri Tekakwitha Roman Catholic Parish, Monroe County, NY; Catholic Charities of the Diocese of Rochester; and The Catholic Youth Organization of Catholic Charities of the Diocese of Rochester | Hanley/Garabedian   |
| Monroe | E2019007694  | Diocese of Rochester; St. Christopher's Church; St. Bridget's Church; St. Leo the Great Catholic Church; St. Francis Xavier Church; St. Bridget's Church and School; Good Shepherd Parish and School; Holy Rosary Church and School; St. Boniface Church and School; St. Mary of the Assumption; and Church of the Annunciation   | Pfau  |
| Monroe | E2019011096  | St. Bridget's Church, aka St. Bridget's Church Rochester; Immaculate Conception/St. Bridget Church Society; St. Anthony's Church of Elmira, New York; Blessed Sacrament Roman Catholic Church of Elmira, NY aka Blessed Sacrament Roman Catholic Church of Elmira, NY; The Parish of The Most Holy Name of Jesus, Chemung County, NY; St. Francis of Assisi Church of Rochester, NY; St. Salome Church; Kateri Tekakwitha Roman Catholic Parish, Monroe County, NY  | Hanley/Garabedian   |
| Tioga  | 2020-<br>00060994  | Blessed Trinity & St. Patrick Parish, St. Patrick's Church and St. Patrick Elementary School  | Herman  |
| Monroe |  | St. Anthony's Church of Elmira, NY; Blessed Sacrament Roman Catholic Church of Elmira, NY, aka Blessed Sacrament Roman Catholic Church of Elmira, NY; The Parish of The Most Holy Name of Jesus, Chemung County, NY; St. Francis of Assisi Church of Rochester, NY; Catholic Charities of the Diocese of Rochester; and the Catholic  | Hanley/Garabedian   |
| Monroe | E2019011585  | St. John the Evangelist Church aka St. John the Evangelist Church of Greece, a religious corporation  | James   |
| Monroe | E2019007719  | The Diocese of Rochester; St. Boniface, aka Southeast Rochester Catholic Community; and Does 1-5 whose identities are unknown to Plaintiff  | Bansbach  |
| Monroe |  | Rochester Catholic Charities; Camp Stella Maris; St. Bernard's School of Theology $\&$  | Anderson/Reck   |
| Monroe |  | ,   | Anderson/Reck   |
|        | Monroe  Monroe  Monroe  Monroe  Monroe  Monroe  Monroe  Monroe  Monroe  Monroe | Monroe       E2019007697         Monroe       E2019007720         Monroe       E2019011098         Monroe       E2019011096         Monroe       E2019011096         Tioga       2020-00060994         Monroe       E2019011987         Monroe       E2019007719         Monroe       E2019007701         Monroe       E2019007708  | Monroe   E2019007697   The Diocese of Rochester; St. Theodore Catholic Church, aka St. Theodore; and Does 1-5 whose identities are unknown to Plaintiff |

| 1/7/2020   | Monroe  | E2020000266 | St. Paul of the Cross of Honeoye Falls, NY; Saint Agnes, Paul and Rose Catholic Parish; St. Boniface Church of Rochester, NY aka St. Boniface Society of Rochester, NY; Southeast Rochester Catholic Community; Immaculate Conception of the Blessed Virgin Mary Church of Ithaca, NY; Holy Cross Catholic Church in Ovid, NY; The Parish of Mary Mother of Mercy; St. Patrick Church in Elmira, NY; Parish of the Most Holy Name of Jesus; St. Mary's Catholic Church German of Dansville, NY; Holy Family Catholic Community; St. Joachim Church in Canisteo, NY; St. Mary Church in Rexville, NY; and Our Lady of the Valley Parish | Hanley/Garabedian |
|------------|---------|-------------|--|-------------------|
| 8/14/2019  | Monroe  | E2019007696 | The Diocese of Rochester; St. Louis, aka St. Lous Church; Church of the Good Shepherd; Marianne Cope Roman Catholic Parish, aka Marianne Cope  | Anderson/Boyd     |
| 8/14/2019  | Monroe  | E2019007711 | The Diocese of Rochester; St. Helen, aka St. Helen's; The Parish of The Holy Family, aka The Parish of The Holy Family, Gates, NY  | Anderson/Reck     |
| 11/20/2019 | Monroe  | E2019011053 | St. Michael's Church of Rochester, NY n/k/a Roman Catholic Parish of St. Frances,<br>Xavier Cabrini aka St. Frances Xavier Cabrini Parish and Vincent Panepinto  | James             |
| 8/14/2019  | Monroe  | E2019007707 | The Diocese of Rochester; Holy Cross, aka Holy Cross Catholic Church   | Anderson/Reck     |
| 8/14/2019  | Monroe  | E2019007712 | The Diocese of Rochester; St. Anne's; The Parish of St. Katharine Drexel   | Anderson/Reck     |
| 1/21/2020  | Monroe  | E2020000725 | Diocese of Rochester, in Rochester, New York, and St. John the Evangelist Church   | Benjamin          |
| 8/14/2019  | Monroe  | E2019007694 | Diocese of Rochester; St. Christopher's Church; St. Bridget's Church; St. Leo the Great Catholic Church; St. Francis Xavier Church; St. Bridget's Church and School; Good Shepherd Parish and School; Holy Rosary Church and School; St. Boniface Church and School; St. Mary of the Assumption; and Church of the Annunciation  | Pfau              |
| 8/28/2019  | Monroe  | E2019008210 | The Roman Catholic Diocese of Rochester, aka The Most Rev. Salvatore R. Matano, as Bishop and Corporate Sole of the Diocese of Rochester, Villa of Hope fka St. Joseph's Villa   | Herman            |
| 8/28/2019  | Monroe  | E2019008215 | The Roman Catholic Diocese of Rochester, aka The Most Rev. Salvatore R. Matano, as Bishop and Corporate Sole of the Diocese of Rochester, DePaul Adult Care Communities, Inc. (formerly known as the DePaul Mental Health Services, Inc.)  | Herman            |
| 8/26/2016  | Chemung | 2019-5256   | Roman Catholic Diocese of Rochester, Parish of the Most Holy Name of Jesus, St. Mary Church in Elmira, New York, Bishop Joseph Lloyd Hogan, Individually and in his capacity as a Roman Catholic Priest in the Diocese of Rochester, and Bishop Emeritus Matthew Harvey Clark, Individually and in his capacity as a Roman Catholic Priest in the Diocese of Rochester   | Smith             |
| 8/14/2019  | Monroe  | E2019007715 | The Diocese of Rochester; St. Bridget aka St. Bridget's; Immaculate Conception/St. Bridget   | Anderson/Boyd     |
| 8/28/2019  | Monroe  | 1           | The Roman Catholic Diocese of Rochester, aka The Most Rev. Salvatore R. Matano, as Bishop and Corporate Sole of the Diocese of Rochester, and St. Mary's Catholic Church   | Herman            |
| 8/14/2019  | Monroe  |             | Diocese of Rochester; St. Christopher's Church; St. Bridget's Church; St. Leo the Great Catholic Church; St. Francis Xavier Church; St. Bridget's Church and School; Good Shepherd Parish and School; Holy Rosary Church and School; St. Boniface Church and School; St. Mary of the Assumption; and Church of the Annunciation  | Pfau              |
| 12/6/2019  | Monroe  | E2019011546 | St. Bridget's Church, aka St. Bridget's Church Rochester; Immaculate Conception/St. Bridget Church Society; St. Anthony's Church of Elmira, New York; Blessed Sacrament Roman Catholic Church of Elmira, NY aka Blessed Sacrament Roman Catholic Church of Elmira, NY; The Parish of The Most Holy Name of Jesus, Chemung County, NY; St. Francis of Assisi Church of Rochester, NY; St. Salome Church; and Kateri Tekakwitha Roman Catholic Parish, Monroe County, NY   | Hanley/Garabedian |

| 8/14/2019  | Monroe | E2019007714 | The Diocese of Rochester; St. Bernard's School of Theology & Ministry, fka St. Bernard's Institute, fka St. Bernard's Seminary; Our Lady of Mercy; Our Mother of Sorrows   | Anderson/Reck     |
|------------|--------|-------------|--|-------------------|
| 8/14/2019  | Monroe | E2019007704 | The Diocese of Rochester; Most Holy Redeemer; Roman Catholic Parish of St. Frances Xavier Cabrini  | Anderson/Boyd     |
| 11/21/2019 | Monroe | E2019011093 | St. Bridget's Church, aka St. Bridget's Church Rochester; Immaculate Conception/St. Bridget Church Society; St. Anthony's Church of Elmira, New York; Blessed Sacrament Roman Catholic Church of Elmira, NY aka Blessed Sacrament Roman Catholic Church of Elmira, NY; The Parish of The Most Holy Name of Jesus, Chemung County, NY; St. Francis of Assisi Church of Rochester, NY; St. Salome Church; Kateri Tekakwitha Roman Catholic Parish, Monroe County, NY   | Hanley/Garabedian |
| 11/6/2019  | Monroe | E2019010537 | St. Michael's Church of Rochester, NY; Roman Catholic Parish of St. Frances Xavier Cabrini Parish; St. Bridget's Church aka St. Bridget's Church Rochester; Immaculate Conception/St. Bridget Church Society; St. Anthony's Church of Elmira, NY; Blessed Sacrament Roman Catholic Church of Elmira, NY aka Blessed Sacrament Roman Catholic Church of Elmira, NY; The Parish of The Most Holy Name of Jesus, Chemung County, NY; St. Francis of Assisi Church of Rochester, NY; St. Salome Church; Kateri Tekakwitha Roman Catholic Parish, Monroe County, NY; Catholic Charities of the Diocese of Rochester; and the Catholic Youth Organization of Catholic Charities of the Diocese of Rochester  | Hanley/Garabedian |
| 10/29/2019 | Monroe | E2019010189 | St. Michael's Church of Rochester, NY; Roman Catholic Parish of St. Frances Xavier Cabrini, aka St. Frances Xavier Cabrini Parish; St. Mary of the Assumption Church of Auburn, NY, aka St. Mary of the Assumption Parish; The Church of The Holy Apostles of Rochester, NY aka Holy Apostles Parish; St. Ambrose Church of Rochester, NY; Peace of Christ Parish; Bridget's Church, aka St. Bridget's Church Rochester; Immaculate Conception/St. Bridget Church Society; St. Anthony's Church of Elmira, NY; Blessed Sacrament Roman Catholic Church of Elmira, NY, aka Blessed Sacrament RomanCatholic Church of Elmira, NY; The Parish of The Most Holy Name of Jesus, Chemung County, NY; St. Frances of Assisi Church of Rochester, NY; St. Salome Church; Kateri Tekakwitha Roman Catholic Parish, Monroe County, NY; Catholic Charities of The Diocese of Rochester; and The Catholic Youth Organization of Catholic Charities of the Diocese of Rochester | Hanley/Garabedian |
| 12/20/2019 | Monroe | 1 1         | Becket Hall, Inc.; Church of the Most Holy Trinity of Webster; and St. Michael's Church  | Hanley/Garabedian |
| 8/14/2019  | Monroe | 1           | The Diocese of Rochester; St. Boniface, aka Southeast Rochester Catholic Community   | Bansbach          |
| 6/10/2019  | Monroe |             | The Diocese of Rochester; The Catholic Youth Organization of Catholic Charities of the Diocese of Rochester; Catholic Charities of the Diocese of Rochester; Most Holy Redeemer Parish; St. Bridget's Church, aka St. Bridget's Church Rochester; Roman Catholic Parish of St. Frances Xavier Cabrini, aka St. Frances Xavier Cabrini Parish; and Immaculate Conception/St. Bridget's Church   | Garabedian        |
| 10/29/2019 | Monroe | E2019010177 | St. Bridget's Church, aka St. Bridget's Church Rochester; Immaculate Conception/St. Bridget Church Society; St. Anthony's Church of Elmira, New York; Blessed Sacrament Roman Catholic Church of Elmira, NY aka Blessed Sacrament Roman Catholic Church of Elmira, NY; The Parish of The Most Holy Name of Jesus, Chemung County, NY; St. Francis of Assisi Church of Rochester, NY; St. Salome Church; Kateri Tekakwitha Roman Catholic Parish, Monroe County, NY; Catholic Charities of The Diocese of Rochester; and The Catholic Youth Organization of Catholic Charities of the Diocese of Rochester  | Hanley/Garabedian |

| 10/29/2019                                   | Monroe | E2019010191 | St. Bridget's Church, aka St. Bridget's Church Rochester; Immaculate Conception/St. Bridget Church Society; St. Anthony's Church of Elmira, New York; Blessed   | Hanley/Garabedian |
|--|--------|-------------|---|-------------------|
|  |        |             | Sacrament Roman Catholic Church of Elmira, NY aka Blessed Sacrament Roman Catholic Church of Elmira, NY; The Parish of The Most Holy Name of Jesus, Chemung County, NY; St. Francis of Assisi Church of Rochester, NY; St. Salome   |                   |
| TO SOME                                      |        |             | Church; Kateri Tekakwitha Roman Catholic Parish, Monroe County, NY; Catholic Charities of the Diocese of Rochester; and the Catholic Youth Organization of Catholic Charities of the Diocese of Rochester   |                   |
| 10/21/2019                                   | Monroe | E2019009929 | St. Bridget's Church, aka St. Bridget's Church Rochester; Immaculate Conception/St. Bridget Church Society; St. Anthony's Church of Elmira, New York; Blessed Sacrament Roman Catholic Church of Elmira, NY aka Blessed Sacrament Roman Catholic Church of Elmira, NY; The Parish of The Most Holy Name of Jesus, Chemung County, NY; St. Francis of Assisi Church of Rochester, New York; St. Salome Church; Kateri Tekakwitha Roman Catholic Parish, Monroe County, NY; Catholic Charities of the Diocese of Rochester; and The Catholic Youth Organization of Catholic Charities of the Diocese of Rochester | Hanley/Garabedian |
| 1/6/2020                                     | Monroe | E2020000338 | St. Bridget's Church, aka St. Bridget's Church Rochester; Immaculate Conception/St. Bridget Church Society; St. Anthony's Church of Elmira, New York; Blessed Sacrament Roman Catholic Church of Elmira, NY aka Blessed Sacrament Roman Catholic Church of Elmira, NY; The Parish of The Most Holy Name of Jesus, Chemung County, NY; St. Francis of Assisi Church of Rochester, NY; St. Salome Church; Kateri Tekakwitha Roman Catholic Parish, Monroe County, NY; Catholic Charities of the Diocese of Rochester; and The Catholic Youth Organization of Catholic Charities of the Diocese of Rochester       | Hanley/Garabedian |
| 8/29/2019                                    | Monroe | E2019008258 | Roman Catholic Diocese of Rochester   | McGuire/Foote     |
| 9/17/2019<br>10/15/19<br>personal<br>service | Monroe | E2019008843 | Diocese of Rochester and St. Francis of Assisi  | Zekowski          |
| 8/14/2019                                    | Monroe | E2019007706 | The Diocese of Rochester; Immaculate Heart of Mary Seminary (Preparatory); St. Patrick's; St. Francis & St. Clare, aka St. Francis and St. Clare Roman Catholic Parish, Seneca County, NY   | Anderson/Boyd     |
| 8/14/2019                                    | Monroe | E2019007694 | Diocese of Rochester; St. Christopher's Church; St. Bridget's Church; St. Leo the Great Catholic Church; St. Francis Xavier Church; St. Bridget's Church and School; Good Shepherd Parish and School; Holy Rosary Church and School; St. Boniface Church and School; St. Mary of the Assumption; and Church of the Annunciation   | Pfau              |
| 8/14/2019                                    | Monroe | E2019007721 | The Diocese of Rochester; St. John Evangelist, aka St. John the Evangelist, aka St. John the Evangelist Greece  | Bansbach          |
| 8/14/2019                                    | Monroe | E2019007713 | The Diocese of Rochester  | Anderson/Boyd     |
| 8/14/2019                                    | Monroe |             | Diocese of Rochester; St. Christopher's Church; St. Bridget's Church; St. Leo the Great Catholic Church; St. Francis Xavier Church; St. Bridget's Church and School; Good Shepherd Parish and School; Holy Rosary Church and School; St. Boniface Church and School; St. Mary of the Assumption; and Church of the Annunciation   | Pfau              |
| 8/14/2019                                    | Monroe | 1           | The Diocese of Rochester; St. John Evangelist, aka St. John the Evangelist, aka St. John the Evangelist Greece  | Bansbach          |
| 8/14/2019                                    | Monroe | E2019007723 | The Diocese of Rochester; St. Boniface, aka Southeast Rochester Catholic Community  | Bansbach          |
| 9/9/2019                                     | Monroe | E2019008550 | The Diocese of Rochester; Roman Catholic Parish of St. Frances Xavier Cabrini, Rochester, NY (formerly Church of the Annunciation of Rochester, NY);  | James             |
| 11/13/2019                                   | Monroe | E2019010764 | St. Bridget's Church, aka St. Bridget's Church Rochester; Immaculate Conception/St. Bridget Church Society; St. Anthony's Church of Elmira, New York; Blessed Sacrament Roman Catholic Church of Elmira, NY aka Blessed Sacrament Roman Catholic Church of Elmira, NY; The Parish of The Most Holy Name of Jesus, Chemung County, NY; St. Francis of Assisi Church of Rochester, New York; St. Salome Church; Kateri Tekakwitha Roman Catholic Parish, Monroe County, NY; and   | Hanley/Garabedian |
|  |        |             | Camp Stella Maris of Livonia, NY  |                   |

| 12/0/2010    | 110000           | E2010011E40  | Co. March Catholic Charles Co. Co. Co. Cl. Alvert Co. Cl. Co. |                          |
|--------------|------------------|--|---|--------------------------|
| 12/9/2019    | Monroe           | E2019011540  | St. Mary's Catholic Church German of Dansville, NY; Holy Family Catholic Community; St. Patrick Church of Oswego, NY; Blessed Trinity and St. Patrick   | Hanley/Garabedian        |
|              |                  |  | Parish; St. Cecilia Church of Irondequoit, NY; Kateri Tekakwitha Roman Catholic   |                          |
|              |                  |  | Parish, Monroe County, NY   |                          |
| 8/14/2019    | Monroe           | E2019007724  | The Diocese of Rochester; St. Boniface, aka Southeast Rochester Catholic  | Bansbach                 |
|              |                  |  | Community   |                          |
| 10/7/2019    | Monroe           | E2019009501  | Roman Catholic Diocese of Rochester and Villa of Hope formerly known as St.   | Zekowski                 |
|              |                  |  | Joseph's Villa  |                          |
| 12/9/2019    | Monroe           | E2019011531  | St. Mary's Catholic Church German of Dansville, NY; Holy Family Catholic  | Hanley/Garabedian        |
|              |                  |  | Community; St. Patrick Church of Oswego, NY; Blessed Trinity and St. Patrick  |                          |
| ]            |                  |  | Parish; St. Cecilia Church of Irondequoit, NY; Kateri Tekakwitha Roman Catholic   |                          |
| 8/14/2019    | Monroe           | E2019007716  | Parish, Monroe County, NY The Diocese of Rochester; St. Bridget aka St. Bridget's Immaculate Conception/St.   | Anderson/Reck            |
| 0,11,2013    | 100000           | 2013007710   | Bridget   | Anderson/Neck            |
| 8/14/2019    | Monroe           | E2019007694  | Diocese of Rochester; St. Christopher's Church; St. Bridget's Church; St. Leo the   | Pfau                     |
|              |                  |  | Great Catholic Church; St. Francis Xavier Church; St. Bridget's Church and School;  |                          |
|              |                  |  | Good Shepherd Parish and School; Holy Rosary Church and School; St. Boniface  |                          |
|              |                  |  | Church and School; St. Mary of the Assumption; and Church of the Annunciation   |                          |
| 12/5/2019    | Monroe           | E2019011482  | Church of the Holy Name of Jesus of Rochester, New York; Church of St. Charles  | Hanley/Garabedian        |
|              |                  |  | Borromeo, of Greece, N.Y., aka Church of St. Charles Borromeo; St. Patrick's Church   |                          |
|              |                  |  | of Victor; The Church of St. Francis DeSales; DeSales High School; Our Lady of Peace  |                          |
|              |                  |  | Roman Catholic Parish of Geneva, N.Y.; Saint Augustine's Church, Rochester, N.Y.,   |                          |
|              |                  |  | aka Saint Augustine's Church, Rochester, N.Y.; Saint Monica's Church; St. Mary's  |                          |
|              |                  |  | Catholic Church German of Dansville, N.Y.; and Holy Family Catholic Community,  |                          |
| 0/14/2010    | N 4              | 52040007002  | Inc.  | I                        |
| 8/14/2019    | Monroe           | E2019007693  | Diocese of Rochester, St. Mary's Church, and Our Lady of the Lakes  | Merson                   |
| 8/14/2019    | Monroe           | E2019007698  | The Diocese of Rochester; St. John of Rochester Church, aka St. John of Rochester   | Anderson/Reck            |
| 0, 1 1, 2010 | 1,11011100       | 22013007030  | Church of Perinton, New York, aka Church of St. John of Rochester of Perinton,  | Anderson/Neck            |
|              |                  |  | New York, aka St. John of Rochester Catholic Church   |                          |
| 2/4/2020     | Livingston       | 000112-2020  | Joseph Edward Larrabee; St. Agnes of Avon, NY; Saint Agnes Paul and Rose Catholic   | Hanley/Garabedian        |
|              |                  |  | Parish; St. Mary's Catholic Church German of Dansville, NY; and Holy Family   | ,,                       |
|              |                  |  | Catholic Community  |                          |
| 2/5/2020     | Monroe           | E2020001361  | St. Boniface Church of Rochester, NY aka St. Boniface Society of Rochester, NY;   | Hanley/Garabedian        |
|              |                  |  | Southeast Rochester Catholoic Community; Sacred Heart Cathedral; and the  |                          |
| - 1 - 1      |                  |  | Cathedral Community at the Sacred Heart Cathedral   |                          |
| 2/4/2020     | Livingston       | 000113-2020  | Joseph Edward Larrabee; St. Agnes of Avon, NY; Saint Agnes Paul and Rose Catholic   | Hanley/Garabedian        |
|              |                  |  | Parish; St. Mary's Catholic Church German of Dansville, NY; and Holy Family   |                          |
|              | Moores           | F2020000402  | Catholic Community  | C 1 1                    |
|              | Monroe<br>Broome | E2020000402<br>EFCA 2019003403   | Camp Stella Maris The Roman Catholic Diocese of Syracuse; The Church of the Blessed Sacrament; St.  | Garabedian<br>Garabedian |
|              | Broome           | LI CA2013003403  | Vincent Roman De Paul - Blessed Sacrament Church of Vestal, N.Y.; Young Men's   | Garabeuran               |
|              |                  |  | Christian Association of Broome County; and Camp Stella Maris of Livonia, N.Y.  |                          |
|              |                  |  |   |                          |
| 2/20/2020    | Monroe           | E2020001886  | St. Bridget's Church, aka St. Bridget's Church Rochester; Immaculate Conception/St.   | Garabedian               |
|              |                  |  | Bridget Church Society; St. Anthony's Church of Elmira, New York; Blessed   |                          |
|              |                  |  | Sacrament Roman Catholic Church of Elmira, N.Y., aka Blessed Sacrament Roman  |                          |
|              |                  |  | Catholic Church of Elmira, NY; The Parish of The Most Holy Name of Jesus,   |                          |
|              |                  |  | Chemung County, NY; St. Francis of Assisi Church of Rochester, New York; St.  |                          |
|              |                  |  | Salome Church; Kateri Tekakwitha Roman Catholic Parish, Monroe County, NY;  |                          |
|              |                  |  | Catholic Charities of the Diocese of Rochester; and The Catholic Youth  |                          |
|              |                  |  | Organization of Catholic Charities of the Diocese of Rochester  |                          |
| 2/20/2020    | Monroe           | E2020001888  | Joseph Edward Larrabee; St. John the Evangelist Church of Greece; St. Agnes of  | Garabedian               |
|              |                  |  | Avon, NY; Saint Agnes, Paul and Rose Catholic Parish, St. Mary's Catholic Church  |                          |
|              |                  |  | German of Dansville, NY; and Holy Family Catholic Community   |                          |
| 2/20/2020    | Monroe           | E2020001895  | St. Bridget's Church, aka St. Bridget's Church Rochester; Immaculate Conception/St.   | Garabedian               |
|              |                  | The second secon | Bridget Church Society; St. Anthony's Church of Elmira, New York; Blessed   |                          |
|              |                  |  | Sacrament Roman Catholic Church of Elmira, N.Y., aka Blessed Sacrament Roman  |                          |
|              |                  |  | Catholic Church of Elmira, NY; The Parish of The Most Holy Name of Jesus,   |                          |
|              |                  |  | Chemung County, NY; St. Francis of Assisi Church of Rochester, New York; St.  |                          |
|              |                  |  | Salome Church; Kateri Tekakwitha Roman Catholic Parish, Monroe County, NY;  |                          |
|              |                  |  | Catholic Charities of the Diocese of Rochester; and The Catholic Youth  |                          |
|              |                  |  | Organization of Catholic Charities of the Diocese of Rochester  |                          |

| 2/20/2020 | Monroe | E2020001897 | St. Bridget's Church, aka St. Bridget's Church Rochester; Immaculate Conception/St. Bridget Church Society; St. Anthony's Church of Elmira, New York; Blessed Sacrament Roman Catholic Church of Elmira, N.Y., aka Blessed Sacrament Roman Catholic Church of Elmira, NY; The Parish of The Most Holy Name of Jesus, Chemung County, NY; St. Francis of Assisi Church of Rochester, New York; St. Salome Church; Kateri Tekakwitha Roman Catholic Parish, Monroe County, NY; Catholic Charities of the Diocese of Rochester; and The Catholic Youth Organization of Catholic Charities of the Diocese of Rochester | Garabedian  |
|-----------|--------|-------------|--|---|
| 2/20/2020 | Monroe | E2020001898 | St. Bridget's Church, aka St. Bridget's Church Rochester; Immaculate Conception/St. Bridget Church Society; St. Anthony's Church of Elmira, New York; Blessed Sacrament Roman Catholic Church of Elmira, N.Y., aka Blessed Sacrament Roman Catholic Church of Elmira, NY; The Parish of The Most Holy Name of Jesus, Chemung County, NY; St. Francis of Assisi Church of Rochester, New York; St. Salome Church; Kateri Tekakwitha Roman Catholic Parish, Monroe County, NY; Catholic Charities of the Diocese of Rochester; and The Catholic Youth Organization of Catholic Charities of the Diocese of Rochester | Garabedian  |
| 2/20/2020 | Monroe | E2020001899 | St. Bridget's Church, aka St. Bridget's Church Rochester; Immaculate Conception/St. Bridget Church Society; St. Anthony's Church of Elmira, New York; Blessed Sacrament Roman Catholic Church of Elmira, N.Y., aka Blessed Sacrament Roman Catholic Church of Elmira, NY; The Parish of The Most Holy Name of Jesus, Chemung County, NY; St. Francis of Assisi Church of Rochester, New York; St. Salome Church; Kateri Tekakwitha Roman Catholic Parish, Monroe County, NY; Catholic Charities of the Diocese of Rochester; and The Catholic Youth Organization of Catholic Charities of the Diocese of Rochester | Garabedian  |
| 2/19/2020 | Monroe | E2020001863 | St. Boniface Church of Rochester, NY, aka St. Boniface Society of Rochester, NY; Southeast Rochester Catholic Community; Immaculate Conception of the Blessed Virgin Mary Church of Ithaca, NY; St. Bernard Seminary, aka St. Bernard's School of Theology & Ministry; and Eugene G. Emo   | Garabedian  |
| 2/20/2020 | Monroe | E2020001884 | Church of the Good Shepherd; and Marianne Cope Roman Catholic Parish of Monroe County  | Garabedian  |
| 2/20/2020 | Monroe | E2020001885 | Church of the Good Shepherd; and Marianne Cope Roman Catholic Parish of Monroe County  | Garabedian  |
| 2/20/2020 | Monroe | E2020001871 | Church of the Good Shepherd; and Marianne Cope Roman Catholic Parish of Monroe County  | Garabedian  |
|           |        |             |  | Opposing Counsel Key: Maura C. McGuire Nathanial L. Foote Paul Hanley Mitchell Garabedian Michael T. Pfau Jeffrey R. Anderson Steve Boyd J. Michael Reck John M. Bansbach Robert J. Greenstein Jeff Herman Leander James Ron Benjamin Jarrod W. Smith Brett A. Zekowski |

## Schedule 2

## Stay Defendants

| Paris | shee   |
|-------|--|
|       |  |
| 1.    | Sacred Heart Cathedral, Rochester                  |
| 2.    | **Annunciation, Rochester                          |
| 3.    | **St. Ambrose, Rochester                           |
| 4.    | **St. Andrew, Rochester                            |
| 5.    | **St. Anthony of Padua, Rochester                  |
| 6.    | **St. Augustine, Rochester                         |
| 7.    | St. Anne, Rochester                                |
| 8.    | Blessed Sacrament, Rochester                       |
| 9.    |  |
|       | **Corpus Christi, Rochester                        |
| 10.   | St. Boniface, Rochester                            |
| 11.   | **St. Bridget, Rochester                           |
| 12.   | ** St. Cecilia, Rochester                          |
| 13.   | St. Charles Borromeo, Rochester                    |
| 14.   | **Christ the King, Rochester                       |
| 15.   | **Church of the Annunciation, Rochester            |
| 16.   | Emmanuel Church of the Deaf, Rochester             |
| 17.   | **St. Feehan, Rochester                            |
| 18.   |  |
|       | **St. Francis of Assisi, Rochester                 |
| 19.   | St. Frances Xavier Cabrini, Rochester              |
| 20.   | St. George, Rochester                              |
| 21.   | **Guardian Angels, Rochester                       |
| 22.   | **St. Helen, Rochester                             |
| 23.   | Holy Apostles, Rochester                           |
| 24.   | Holy Cross, Rochester                              |
| 25.   | **Holy Ghost, Rochester                            |
| 26.   | **Holy Family, Rochester                           |
| 27.   | **Holy Name of Jesus, Rochester                    |
| 28.   | **Holy Redeemer, Rochester                         |
| 29.   |  |
|       | St. Francis Xavier, Rochester                      |
| 30.   | **Holy Redeemer/St. Francis Xavier, Rochester      |
| 31.   | **Holy Rosary, Rochester                           |
| 32.   | **Immaculate Conception, Rochester                 |
| 33.   | Immaculate Conception/St. Bridget, Rochester       |
| 34.   | **St. James, Rochester                             |
| 35.   | **St. John the Evangelist, Rochester               |
| 36.   | St. John the Evangelist, Rochester                 |
| 37.   | **St. Joseph, Rochester                            |
| 38.   | Kateri Tekakwitha Roman Catholic, Rochester        |
| 39.   | St. Lawrence, Rochester                            |
| 40.   |  |
|       | **St. Lucy, Rochester                              |
| 41.   | **Light of Christ Roman Catholic Parish, Rochester |
| 42.   | **St. Margaret Mary, Rochester                     |
| 43.   | St. Mark, Rochester                                |
| 44.   | St. Mary, Rochester                                |
| 45.   | **St. Michael, Rochester                           |
| 46.   | St. Monica, Rochester                              |
| 47.   | **Our Lady of the Americas, Rochester              |
|       |  |

- 48. \*\*Our Lady of Good Counsel, Rochester
- 49. Our Lady of Lourdes, Rochester
- \*\*Our Lady of Mount Carmel, Rochester
- 51. \*\*Our Lady of Mercy, Rochester
- 52. \*\*Our Lady of Perpetual Help, Rochester
- \*\*Our Lady of Sorrows, Rochester
- 54. Our Lady of Victory-St. Joseph, Rochester
- 55. Our Lady Queen of Peace, Rochester
- 56. Our Mother of Sorrows, Rochester
- 57. The Parish of the Holy Family, Rochester
- 58. Peace of Christ, Rochester
- 59. \*\*St. Patrick, Rochester
- 60. \*\*Sts Peter & Paul, Rochester
- 61. St. Pius Tenth, Rochester
- 62. \*\*St. Salome, Rochester
- 63. St. Stanislaus, Rochester
- 64. St. Theodore, Rochester
- 65. \*\*St. Theresa of the Infant Jesus, Rochester
- 66. St. Thomas More, Rochester
- 67. \*\*St. Thomas the Apostle, Rochester
- 68. \*\*St. Catherine of Siena, Addison
- 69. Saints Isidore and Maria Torribia, Addison
- 70. \*\*St. Margaret Mary, Appalachin
- 71. \*\*St. Mathias, Atlanta
- 72. St. Alphonsus, Auburn
- 73. \*\*St. Aloysius, Auburn
- 74. \*\*St. Francis of Assisi, Auburn
- 75. Holy Family, Auburn
- 76. \*\*St. Hyacinth, Auburn
- 77. St. Mary, Auburn
- 78. Saints Mary and Martha, Auburn
- 79. Sacred Heart, Auburn
- 80. Good Shephard Catholic Community, Aurora
- 81. St. Agnes, Avon
- 82. St. John Vianney, Bath
- 83. \*\*St. Mary, Bath
- 84. \*\*St. Stanislaus, Bradford
- 85. Nativity of the Blessed Virgin Mary, Brockport
- 86. \*\*St. Columba, Caledonia
- 87. The Parish of Saint Martin De Porres, Caledonia
- 88. \*\*Our Lady of Lebanon, Canandaigua
- 89. St. Benedict, Canandaigua
- 90. \*\*St. Mary, Canandaigua
- 91. \*\*St. Joachim, Canisteo
- 92. \*\*St. William, Cameron Mills
- 93. \*\*St. Joseph, Campbell
- 94. \*\*St. Patrick, Cato
- 95. \*\*St. Francis of Assisi, Catatonk
- 96. \*\*St. Joseph, Cayuga
- 97. \*\*St. Vincent De Paul, Churchville
- 98. \*\*St. Felix, Clifton Springs
- 99. \*\*St. Felix/St. Francis Parish Cluster, Clifton Springs
- 100. St. Peter's Roman Catholic Parish, Clifton Springs

- 101. \*\*St. John the Evangelist, Clyde
- 102. St. Joseph the Worker, Clyde
- 103. \*\*St. Pius V, Cohocton
- 104. \*\*St. William, Conesus
- 105. All Saints, Corning
- 106. \*\*Santa Maria de Mercede, Cuylerville
- 107. \*\*St. Mary, Dansville
- \*\*St. Patrick, Dansville 108.
- 109. \*\*St. Andrew, Dundee
- Holy Cross, Dryden 110.
- 111. \*\*St. Bridget, East Bloomfield
- 112. St. Jerome, East Rochester
- 113. \*\*St. Charles Borromeo, Elmira
- 114. \*\*St. Anthony, Elmira
- 115. \*\*Blessed Sacrament, Elmira
- \*\*St. Casimir, Elmira 116.
- \*\*St. Cecilia, Elmira 117.
- 118. \*\*Christ the Redeemer, Elmira
- 119. \*\*St. John the Baptist, Elmira
- 120. \*\*St. Mary, Elmira
- \*\*Our Lady of Lourdes, Elmira 121.
- 122. The Parish of the Most Holy Name of Jesus, Elmira
- 123. \*\*St. Patrick, Elmira
- 124. \*\*Sts. Peter and Paul Catholic Parish, Elmira
- 125. Church of the Assumption, Fairport
- 126. Church of the Resurrection, Fairport
- 127. St. John of Rochester, Fairport
- 128. St. Luke the Evangelist, Geneseo
- 129. \*\*St. Mary, Geneseo
- 130. \*\*St. Francis De Sales, Geneva
- 131. Our Lady of Peace, Geneva
- 132. \*\*St. Stephen, Geneva
- 133. \*\*St. Hillary, Genoa
- 134. \*\*St. Mary, Greenwood
- 135. St. Anthony, Groton
- 136. \*\*Holy Name of Jesus, Groveland
- 137. St. Elizabeth Ann Seton, Hamlin
- 138. \*\*St. Gabriel, Hammondsport
- 139. \*\*Church of the Good Shepherd, Henrietta
- 140. St. Marianne Cope, Henrietta
- 141. St. Leo, Hilton
- 142. St. Paul of the Cross, Honeoye Falls
- 143. St. Mary, Our Lady of the Hills, Honeoye

\*\*Our Lady of the Lake, King Ferry

- 144. \*\*St. Ann, Hornell
- Our Lady of the Valley, Hornell 145.
- \*\*St. Ignatius Loyola, Hornell 146.
- 147. St. Mary Our Mother, Horseheads
- 148. \*\*St. Francis Solanus, Interlaken
- 149. St. Catherine of Siena, Ithaca
- 150. Immaculate Conception, Ithaca 151.
- 152. All Saints, Lansing
- \*\*St. Thomas Aquinas, Leicester 153.

- 154. St. Rose, Lima
- 155. St. Matthew Catholic Church Society, Livonia
- 156. \*\*St. Joseph, Livonia
- 157. \*\*St. Michael, Livonia Center
- 158. \*\*St. Michael, Lyons
- 159. \*\*St. Patrick, Macedon
- 160. \*\*St. Gregory, Marion
- 161. \*\*St. Patrick, McLean
- 162. St. Catherine of Siena, Mendon
- 163. \*\*St. Michael, Montezuma
- 164. \*\*St. Patrick, Moravia
- 165. \*\*Church of the Assumption, Mount Morris
- 166. \*\*St. Patrick, Mount Morris
- 167. \*\*St. Patrick, Mumford
- 168. \*\*St. Januarius, Naples
- 169. \*\*St. John the Evangelist, Newark Valley
- 170. St. Michael, Newark
- 171. St. Christopher, North Chili
- 172. \*\*Holy Angels, Nunda
- 173. St. Benedict, Odessa
- 174. \*\*St. Mary of the Lake, Ontario
- 175. St. Maximillian Kolbe, Ontario
- 176. \*\*Holy Cross, Ovid
- 177. The Parish of Mary, Mother of Mercy, Interlaken
- 178. St. Ann, Owasco
- 179. Blessed Trinity, Owego
- 180. St. Patrick, Owego
- 181. \*\*Immaculate Heart of Mary, Painted Post
- 182. \*\*St. Anne, Palmyra
- 183. The Parish of St. Katharine Drexel, Palmyra
- 184. Holy Spirit, Webster
- 185. St. Joseph, Penfield
- 186. \*\*St. Michael, Penn Yan
- 187. Our Lady of Lakes Catholic Community, Penn Yan
- 188. \*\*Sacred Heart of Jesus, Perkinsville
- 189. \*\*St. Francis, Phelps
- 190. Church of the Transfiguration, Pittsford
- 191. St. Louis, Pittsford
- 192. \*\*St. Raphael, Piffard
- 193. \*\*St. Patrick, Prattsburg
- 194. \*\*St. Thomas the Apostle, Red Creek
- 195. \*\*St, Lucy, Retsof
- 196. \*\*St. Mary, Rexville
- 197. \*\*St. Joseph, Rush
- 198. \*\*St. Mary, Rushville
- 199. \*\*St. Patrick, Savannah
- 200. \*\*St. Bernard, Scipio Center
- 201. \*\*St. Mary of the Assumption, Scottsville
- 202. \*\*St. Patrick, Seneca Falls
- 203. \*\*St. Dominic, Shortsville
- 204. \*\*Epiphany, Sodus
- 205. \*\*St. Rose of Lima, Sodus Point
- 206. St. John the Evangelist, Spencerport

- 207. \*\*St. Theresa, Stanley
- 208. \*\*St. James the Apostle, Trumansburg
- 209. \*\*St. Michael's, Union Springs
- 210. \*\*St. Pius the Tenth, Van Etten
- 211. St. Patrick, Victor
- 212. St. Francis and St. Clare, Waterloo
- 213. \*\*St. Mary, Waterloo
- 214. St. Mary of the Lake, Watkins Glen
- 215. \*\*St. James, Waverly
- 216. Holy Family Catholic Community, Wayland
- 217. \*\*St. Joseph, Wayland
- 218. Holy Trinity, Webster
- 219. St. Paul, Webster
- 220. St. Rita, Webster
- 221. \*\*St. John, Weedsport
- 222. \*\*St. Joseph, Cato
- 223. Our Lady of the Snow, Weedsport
- 224. \*\*St. Joseph, West Bloomfield
- 225. Catholic Community of Blessed Trinity, Wolcott
- 226. \*\*St. Mary Magdalene, Wolcott

#### Other Entities

- 1. Catholic Charities of the Diocese of Rochester, Inc.
- 2. Rochester Catholic Press Association, Inc. ("Catholic Courier")
- 3. Catholic Youth Organization of Catholic Charities of the Diocese of Rochester
- 4. Providence Housing Development Corporation
- 5. Camp Stella Maris of Livonia, N.Y.
- 6. St. Bernards School of Theology and Ministry
- 7. Villa of Hope (f/k/a St. Joseph's Villa)
- 8. De Paul Community Services (f/k/a De Paul Mental Health Clinic)

#### Schools

- 1. All Saints in Corning
- 2. Holy Family in Elmira
- 3. St. Joseph in Auburn
- 4. St. Francis/St. Stephen in Geneva
- 5. De Sales High School in Geneva

<sup>\*\*</sup> Indicates a parish that is closed, has merged with another or is otherwise inactive at this time.

#### Schedule 3

### **Document Requests**

## Document Request by Official Creditors' Committee to Diocese of Rochester

## October \_, 2019

As used in this Document Request, the term "Diocesan" or "Diocese" includes both the civil entity and Canon law juridic person identified The Diocese of Rochester on the Petition, and any predecessor thereof.

- 1. All versions of Diocesan articles of incorporation in last twenty years.
- 2. All versions of Diocesan bylaws in last twenty years.
- 3. All versions of the norms, statutes, operating guidelines/policies/instructions and policy manuals issued by/created by Diocese in the last ten years.
- 4. Audited Financial Statements of the Diocese for the last ten years.
- 5. List of all Diocesan committees, subcommittees and councils that existed over the last ten years.
- 6. List of all entities in which the Bishop, Chancellor or Vicar General of the Diocese are or have been an officer or director in the last ten years (including positions held ex officio).
- 7. Minutes of meetings (including any agendas and materials distributed at meetings) of following Diocesan councils/subcommittees/committees for the last 10 years:
  - a. Stewardship Council;
  - b. Finance and
  - c. Presbyteral.
- 8. List of all general ledger accounts for any entity that is in the possession, custody or control of the Diocese.
- 9. All documentation of restrictions for all funds listed under question no. 77 of Schedules A/B of the Schedules of Assets and Liabilities (as they may be amended, the "SOAL") (Docket No. 79).
- 10. All documents regarding the use of funds received in the Our Legacy, Our Hope capital campaign described in Note 4 of the 2018 Financials.
- 11. All documents and communications regarding the PSIP Fund listed on question no. 77 of the SOAL (page 13 of 64).
- 12. All documents temporarily restricted net assets described in Note 6 (page 9) of The Diocese of Rochester Pastoral Center Operations and Associated Funds Financial Statements as of June 30, 2018 (the "2018 Financials").
- 13. All documents regarding Board Designated, Temporarily Restricted and Permanently Restricted funds listed in Note 7 (pages 9-10) of the 2018 Financials.
- 14. Current accounts receivable aging by payee.
- 15. Amounts due to Diocese from insurance carriers for defense costs/fees by carrier.
- 16. All documents regarding Investments held for insurance reserves described in Note 5 (page 8) of the 2018 Financials.
- 17. All documents regarding Insurance Funding described in Note 9 (page 12) of the 2018 Financials.
- 18. All Diocesan personal property inventories for the last 10 years.
- 19. All appraisals for real and personal property disclosed on the SOAL and the Statement of Financial Affairs (as amended, the "SOFA") (Docket No. 79), regardless of whether Debtor contends that property is held for benefit of a third party.
- 20. All documents regarding Fixed Assets listed in Note 8 (page 11) of the 2018 Financials.

- 21. Copies of all real property deeds from Debtor to third parties conveying property in the last ten years, including to or for the benefit of parishes or missions. Committee requests copies of recorded deeds if available.
- 22. All unexpired leases or permissive use agreements in excess of one year from Diocese to third party.
- 23. Last two quinquennial reports.
- 24. All norms, statutes, operating guidelines/policies/instructions and policy manuals issued by/created by Diocese related to parishes.
- 25. Samples of each form of Affiliation Agreement (or any agreement to similar effect regardless of nomenclature) used by the Diocese and any entity during the last 20 years.
- 26. All parish financial statements from 2009 to present.
- 27. Minutes of meetings of the boards of directors of each parish from 2017 to the present.
- 28. All inventories of parish property from 2009 to present.
- 29. Identify IRS rulings based on which the Diocese has determined that priests should be treated as employees of the parishes.
- 30. All versions of the articles of incorporation of the Communis Fund of the Diocese of Rochester, Inc. (the "Communis Fund").
- 31. All versions of Communis Fund bylaws.
- 32. List of all Communis Fund directors and officers (including ex officio) for last ten years.
- 33. All versions of the norms, statutes, operating guidelines/policies/instructions and policy manuals issued by/created by Diocese related to the Communis Fund.
- 34. List of all Communis Fund committees, subcommittees and councils that existed over the last ten years.
- 35. Minutes of meetings (including any agendas and materials distributed at meetings) of Communis Fund councils/subcommittees/committees.
- 36. All annual financial statements (income statement, balance sheet and change in position) for Communis Fund.
- 37. All documents evidencing Diocesan funds, restricted and non-restricted, deposited at the Communis Fund and all documents evidencing restrictions on such funds.
- 38. List of accounts in Communis Fund and balances of such accounts.
- 39. List of loans due to Communis Fund, summary of terms and conditions and status (e.g. delinquent/current).
- 40. All documents regarding any pension plans covering Diocesan or parish employees (including clergy) (e.g., the Diocese of Rochester Priests' Retirement Plan and the Diocese of Rochester Lay Employees' Retirement Plan), including without limitation the following for the period from 2009 to the Petition Date:
  - a. Master Trust Agreements in effect during the last ten years (including the agreements listed at responses 2.160 and 2.161 of Schedule G of the SOAL);
  - b. Calculations of reserves.
  - c. Calculations of shortfalls, including as described in Note 12 of the 2018 Financials (page 13).
  - d. Financial statements (including balance sheets, profit and loss statements, and statements of cash flows);
  - e. Reports to any governmental agency.
- 41. To the extent any priest is identified on the Diocesan webpage named "Dispositions 2002-Present" under the webpage tab named "Protecting Our Children" has, since the disposition of the claims against the priest, received any funds or support from the Diocese, parish or any pension plan identified in the Diocesan SOAL or SOFA, (a) the amount of each payment/type of support, (b) a schedule of all amounts received by the priest by month and year, (c) all documents

- evidencing basis for his entitlement to payments/support and (d) all documents evidencing the priest's interest in any applicable pension plan.
- 42. Basis for calculating "Discretionary pension contributions" described on page 3 of the 2018 Financials.
- 43. Personnel files for any priest is identified on the Diocesan webpage named "Dispositions 2002-Present" under the webpage tab named "Protecting Our Children".
- 44. All confidential files maintained by the Bishop pursuant to Canon 489 of the Code of Canon Law.
- 45. All files of the Diocesan Review Board.
- 46. Diocese's written therapy policy
- 47. By name and address, a schedule of parish cemeteries and regional cemeteries associated with the Diocese.
- 48. Financial statements for each of the parish and regional cemeteries of Catholic Cemeteries of the Roman Catholic Diocese of Rochester from 2015-present.
- 49. All documents evidencing any trust claim over assets of Catholic Cemeteries of the Roman Catholic Diocese of Rochester, including any claims of trust over maintenance funds.
- 50. Copy of all subpoenas from any governmental entity to the Diocese since 2016.
- 51. Copy of all responses to any subpoena identified in no. 40.
- 52. All documents regarding the life insurance policies described in response question 73 of Schedule A/B of the SOAL.
- 53. All documents regarding the 602 shares of Great Expectations Ltd. Described in response to question 15 of Schedule A/B of the SOAL.
- 54. Schedule of transfers between the Diocese the following from 2009 to the Petition Date:
  - a. Catholic Charities of the Diocese of Rochester;
  - b. St. Padre Pio Institute of Rochester, Inc.; and
  - c. Providence Housing Development Corporation.
- 55. Copies of all insurance policies in which the Diocese, Parishes, or any other entity related to the Diocese (including without limitation schools, foster care agencies, adoption agencies, social services agencies, housing agencies) claims an interest in the proceeds thereof (including as an insured, additional insured, or otherwise).
- 56. Copies of all insurance coverage letters regarding claims under the CVA.
- 57. Agreements between any Religious Institute (including entities or institutions operated by Religious Institutes, such as schools, monastaries, or convents) and the Diocese from 1945 to the Petition Date.
- 58. List of all Religious Institutes that operated in the territory of the Diocese between 1945 and the present.
- 59. Index of the Diocese's archives.