

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re: Chapter 11
THE DIOCESE OF ST. CLOUD, a Minnesota Case No. 20-60337
religious corporation,
Debtor.

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

**THIS IS AN IMPORTANT NOTICE REGARDING ALL SEXUAL ABUSE CLAIMS
AGAINST THE ABOVE-NAMED ENTITY—YOUR RIGHTS MAY BE AFFECTED
TO ALL PERSONS WITH CLAIMS ARISING FROM SEXUAL ABUSE FOR WHICH
THE DIOCESE OF ST. CLOUD MAY BE LIABLE:**

**OCTOBER 21, 2020 IS THE LAST DATE TO TIMELY FILE PROOFS OF CLAIM FOR
SEXUAL ABUSE**

The Diocese of St. Cloud (the “**Debtor**”) filed a Chapter 11 reorganization case on June 15, 2020, in the United States Bankruptcy Court for the District of Minnesota (the “**Court**”). Numerous individuals have asserted sexual abuse claims against the Debtor. Such claims allege sexual abuse by priests, clergymen, and others connected with the parishes or other institutions within the territory of The Diocese of St. Cloud. Any person who believes that he or she has, or may have, a claim against the Debtor arising from sexual abuse as that term is defined in Minnesota Statutes § 541.073(1), molestation, rape, undue familiarity, sexually-related physical, psychological or emotional harm, or contacts or interactions of a sexual nature between a child and an adult, or a non-consenting adult and another adult for which such persons believe that the Debtor may be liable should carefully read this notice.

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

LAST DATE FOR TIMELY CLAIM FILING

The Court entered an order (the “**Proof of Claim Deadline Order**”) in the Chapter 11 reorganization case of the Debtor setting **October 21, 2020** (the “**Proof of Claim Deadline**”) as the last date by which Proofs of Claim may be filed against the Debtor.

WHO MUST FILE A PROOF OF CLAIM

If you believe that you have a claim relating to sexual abuse, you should file a Confidential Proof of Claim to maintain and preserve any claims that you have against the Debtor. Even if you have already filed a lawsuit against the Debtor alleging sexual abuse prior to June 15, 2020, you must still file a Confidential Proof of Claim to maintain and preserve your rights in the Debtor’s Chapter 11 case.

WHO SHOULD NOT FILE A PROOF OF CLAIM

You should **not** file a Proof of Claim if:

- Your claim has already been paid in full.
- You hold a claim that has been allowed by an order of the Court on or before the Proof of Claim Deadline.

YOU SHOULD NOT FILE A PROOF OF CLAIM IF YOU DO NOT HAVE A CLAIM AGAINST THE DEBTOR.

WHAT TO FILE

YOU MUST FILE A CONFIDENTIAL PROOF OF CLAIM ON THE FORM THAT ACCOMPANIES THIS NOTICE.

INSTRUCTIONS FOR FILLING OUT THE PROOF OF CLAIM FORM

You must complete the entire Confidential Proof of Claim form that accompanies this notice.

For additional copies of the Confidential Proof of Claim form: (a) photocopy the Confidential Proof of Claim form; (b) contact the Debtor's attorneys at (520) 770-8712; (c) visit the Debtor's website at: <http://stedio.org/>; or (d) visit the website of the United States Bankruptcy Court for the District of Minnesota at www.mnb.uscourts.gov.

Please note that the Court's Clerk staff is not permitted to give legal advice. You should consult your own attorney for assistance regarding such inquiries.

WHEN AND WHERE TO FILE

A signed original of a completed Tort Claimant's Confidential Proof of Claim form must be delivered or mailed to the address below so as to be **actually received** no later than **5:00 p.m. (Central Time), on October 21, 2020** by:

**Office of the Clerk of Court
Attention: Heidi Jackson
U.S. Bankruptcy Court District of Minnesota
301 U.S. Courthouse
300 South Fourth Street
Minneapolis, MN 55415**

If you are returning the Confidential Proof of Claim form by mail, allow sufficient mailing time so that the Confidential Proof of Claim form **is received** on or before 5:00 p.m. (Central Time) on October 21, 2020. Confidential Proof of Claim forms that are postmarked before that date, but are received by the Clerk of the Court after that date, will be considered late. **Please note that Confidential Proof of Claim forms submitted by facsimile or e-mail will not be accepted.** Also please note that if you are going to personally deliver the Confidential Proof of Claim to the Clerk's office or have someone deliver it on your behalf, the filing window is only open on Court days until 5:00 p.m. Central Time, and you may need to arrive at the Clerk's office earlier due to wait times in order for your Confidential Proof of Claim to be timely filed. These times are subject to change.

Confidential Proofs of Claim should not be electronically filed with the Court. Doing so will make these documents available online for public viewing. For Confidential Proofs of Claim to remain confidential, a hard copy of such claim must be mailed directly to the Clerk of the Court at the address above.

CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM

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

CONFIDENTIALITY

The Court has determined that filed Confidential Proofs of Claim will remain **confidential** unless you elect otherwise in Part 1 of the Confidential Proof of Claim form. Therefore, the Confidential Proof of Claim you file will not be available to the general public but will be kept confidential, except that the information may be provided, under Court-approved guidelines, to the Debtor and the attorneys for its insurers, attorneys for the Official Committee of Unsecured Creditors and its members, the unknown claims representative appointed in this Chapter 11 case, and such other persons as the Court determines should have the information in order to evaluate the claim, all of whom will agree to keep the information provided by you **confidential**.

ADDITIONAL INFORMATION

Attached are the names of the parishes, missions, and schools of the Debtor as they existed from time to time. If you need additional information regarding the parishes, missions, and schools as they existed from time to time, you can obtain that information by calling the Debtor at (520) 770-8712. If you have questions or want information about the Debtor's reorganization, you can call counsel for the Official Committee of Unsecured Creditors at (612) 335-1645.

PARISHES, MISSIONS AND SCHOOLS OF THE DIOCESE OF ST. CLOUD

CURRENT PARISHES:

<u>Parish Name</u>	<u>City (Location)</u>
Seven Dolors	Albany, MN
St. Anthony	Albany, MN (St. Anthony)
St. Mary	Alexandria, MN
St. Benedict	Avon, MN
Immaculate Conception	Avon, MN (St. Anna)
St. Columbkille	Avon, MN (St. Wendel)
Our Lady of the Lake	Battle Lake, MN
Church of Mary of the Visitation	Becker, MN & Big Lake, MN
St. Francis de Sales	Belgrade, MN
St. Joseph	Bertha, MN
St. John the Baptist	Bluffton, MN
St. Stanislaus Kostka	Bowlus, MN
St. Edward	Bowlus, MN (Elmdale)
Ss. Peter and Paul	Braham, MN
St. Ann	Brandon, MN
Our Lady of Seven Dolors	Brandon, MN (Millerville)
St. Mary of the Presentation	Breckenridge, MN
St. Donatus	Brooten, MN
Christ the King	Browerville, MN
St. Anthony	Browns Valley, MN
St. Michael	Buckman, MN
Christ the King	Cambridge, MN
St. Nicholas	Carlos, MN (Belle River Township)
St. Mary	Chokio, MN
St. Joseph	Clarissa, MN
St. Marcus	Clear Lake, MN
St. Boniface	Cold Spring, MN
St. James	Cold Spring, MN (Jacob's Prairie)
Sacred Heart	Dent, MN
Assumption	Eden Valley, MN
St. Olaf	Elbow Lake, MN
St. Elizabeth	Elizabeth, MN
St. Andrew	Elk River, MN
Ss. Peter & Paul	Elrosa, MN
Our Lady of Victory	Fergus Falls, MN
Sacred Heart	Flensburg, MN
St. John	Foley, MN
St. Elizabeth of Hungary	Foley, MN (Brennyville)

St. Lawrence	Foley, MN (Duelm)
St. Joseph	Foley, MN (Morill)
St. Louis Bertrand	Foreston, MN
Sacred Heart	Freeport, MN
St. Francis of Assisi	Freeport, MN (St. Francis)
St. Rosa of Lima	Freeport, MN (St. Rosa)
Ss. Peter and Paul	Gilman, MN
Sacred Heart	Glenwood, MN
St. Andrew	Greenwald, MN
St. Joseph	Grey Eagle, MN
St. Edward	Henning, MN
St. Charles	Herman, MN
St. Rita	Hillman, MN
Church of All Saints	Holdingsford, MN
Our Lady of Mt. Carmel	Holdingsford, MN (Opole)
St. Elizabeth Ann Seton	Isanti, MN
Our Lady of the Runestone	Kensington, MN
St. Thomas	Kent, MN
St. Anne	Kimball, MN
Holy Cross	Kimball, MN (Pearl Lake)
St. Margaret	Lake Henry, MN
St. John Nepomuk	Lastrup, MN
Our Lady of Lourdes	Little Falls, MN
St. Mary	Little Falls, MN
Holy Family	Little Falls, MN (Belle Prairie)
St. Stanislaus	Little Falls, MN (Sobieski)
St. Mary of Mt. Carmel	Long Prairie, MN
St. John Nepomuk	Lowry, MN (Lake Reno)
St. Mary	Melrose, MN
St. John the Baptist	Melrose, MN (Meire Grove)
St. Michael	Melrose, MN (Spring Hill)
Assumption of Our Lady	Menahga, MN
St. Mary	Milaca, MN
St. Mary	Mora, MN
St. Kathryn	Mora, MN (Ogilvie)
Assumption	Morris, MN
Newman Center	Morris, MN
St. Michael	Motley, MN
Immaculate Conception	New Munich, MN
Holy Cross	New York Mills, MN (Butler)
Holy Cross	Onamia, MN
St. Therese of Vineland	Onamia, MN (Vineland)
Immaculate Conception	Osakis, MN

St. William	Parkers Prairie, MN
Sacred Heart	Parkers Prairie, MN (Urbank)
St. Louis	Paynesville, MN
St. Joseph	Peirz, MN
St. Leonard of Port Mauritius	Pelican Rapids, MN
St. Henry	Perham, MN
St. Lawrence	Perham, MN (Rush Lake)
Holy Cross	Pierz, MN (Harding)
Christ Our Light	Princeton, MN (Zimmerman)
St. James	Randall, MN
Immaculate Conception	Rice, MN
Ss. Peter & Paul	Richmond, MN
Mary of the Immaculate Conception	Rockville, MN
St. Agnes	Roscoe, MN
Holt Trinity	Royalton, MN
Holy Cross	Royalton, MN (North Prairie)
St. Francis Xavier	Sartell, MN
Our Lady of the Angels	Sauk Centre, MN
St. Paul	Sauk Centre, MN
Sacred Heart	Sauk Rapids, MN
Annunciation	Sauk Rapids, MN (Mayhew Lake)
St. Patrick	Sauk Rapids, MN (Minden Township)
Christ Church Newman Center	St. Cloud, MN
Holy Spirit	St. Cloud, MN
St. Anthony of Padua	St. Cloud, MN
St. Augustine	St. Cloud, MN
St. John Cantius	St. Cloud, MN
St. Mary Cathedral	St. Cloud, MN
St. Michael	St. Cloud, MN
St. Paul	St. Cloud, MN
St. Peter	St. Cloud, MN
St. Wendelin	St. Cloud, MN (Luxemburg)
St. Mary Help of Christians	St. Cloud, MN (St. Augusta)
St. Joseph	St. Joseph, MN
St. John the Baptist	St. Joseph, MN (Collegeville)
St. Martin	St. Martin, MN
St. Stephen	St. Stephen, MN
Sacred Heart	Staples, MN
St. John the Baptist	Swanville, MN
St. Gall	Tintah, MN
St. James	Underwood, MN (Maine Township)
St. Mary	Upsala, MN
St. Frederick	Verndale, MN

St. Hubert	Verndale, MN (Blue Grass)
St. Bartholomew	Villard, MN
St. Ann	Wadena, MN
Sacred Heart	Wahkon, MN
St. Joseph	Waite Park, MN
St. Nicholas	Watkins, MN (St. Nicholas)
St. Alexius	West Union, MN
Ave Maria	Wheaton, MN
Christ Our Light	Zimmerman, MN

CURRENT SCHOOLS:

<u>School Name</u>	<u>City (Location)</u>
Holy Family School	Albany, MN
St. Mary School	Alexandria, MN
St. Mary School	Breckenridge, MN
Christ the King School	Browerville, MN
St. Boniface School	Cold Spring, MN
Saint John's Preparatory School	Collegeville, MN
St. Andrew School	Elk River, MN
Our Lady of Victory School	Fergus Falls, MN
St. John's Area School	Foley, MN
Sacred Heart School	Freeport, MN
St. John - St. Andrew School	Greenwald, MN
Holy Cross School	Kimball, MN
Mary of Lourdes Elementary School	Little Falls, MN
Mary of Lourdes Middle School	Little Falls, MN
St. Mary of Mt. Carmel School	Long Prairie, MN
St. Mary School	Melrose, MN
St. Mary School	Morris, MN
St. Agnes School	Osakis, MN
St. Henry's Area School	Perham, MN
Fr. Pierz School of Religion	Pierz, MN
Holy Trinity School	Pierz, MN
Ss. Peter & Paul School	Richmond, MN
St. Francis Xavier School	Sartell, MN
Holy Family School (Sauk Centre Area School)	Sauk Centre, MN
St. Mary Help of Christians School	St. Augusta, MN
St. Wendelin School	St. Cloud, MN
All Saints Academy	St. Cloud, MN
St. Cloud Campus	
Cathedral High School	St. Cloud, MN
Catholic Community Schools	St. Cloud, MN
St. Elizabeth Ann Seton School	St. Cloud, MN
St. Katharine Drexel School	St. Cloud, MN

All Saints Academy
St. Joseph Campus
St. Joseph Catholic School
Sacred Heart School

St. Joseph, MN
St. Joseph, MN
Staples, MN

FORMER PARISHES:

Parish Name

City (Location)

Our Mother of Sorrows
Sacred Heart
Immaculate Conception
Our Lady of the Lake
St. Joseph and St. Peter
St. Joseph
St. Patrick
St. Theresia
St. Peter
St. Catherine
St. Joseph
St. Hedwig
St. Mary
Sacred Heart
St. Francis Xavier
St. Adelbert
St. Boniface
St. Patrick
St. Isidore
St. Anthony
St. Joseph
St. Stanislaus
St. James
St. Edward
Immaculate Conception
Holy Angels
St. Bernard
St. Pius X

Aldrich, MN
Arban, MN
Becker, MN
Big Lake, MN
Browerville, MN
Brushvale, MN
Collis, MN
Donnelly, MN
Dumont, MN
Farming, MN
Foxhome, MN
Holdingford, MN
Holdingford, MN
Little Falls, MN
Little Falls, MN
Little Falls, MN
Melrose, MN
Melrose, MN
Moran, MN
Padua, MN
Perham, MN
Perham, MN
Philbrook, MN
Princeton, MN
Sedan, MN
St. Cloud, MN
Ward Springs, MN
Zimmerman, MN

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re: Chapter 11
THE DIOCESE OF ST. CLOUD, a Minnesota Case No. 20-60337
religious corporation,
Debtor.

CONFIDENTIAL PROOF OF CLAIM (SEXUAL ABUSE)

**IMPORTANT: THIS FORM MUST BE RECEIVED
NO LATER THAN 5:00 P.M. CT, OCTOBER 21, 2020**

Carefully read the Notice and Instructions that are included with this CONFIDENTIAL PROOF OF CLAIM and complete ALL applicable questions. Send the **original** to: **Office of the Clerk of the Court, Attention Heidi Jackson, U.S. Bankruptcy Court District of Minnesota, 301 Diana E. Murphy United States Courthouse, 300 South Fourth Street, Minneapolis, Minnesota 55415. If you mail or deliver the Confidential Proof of Claim form it must be received by the Clerk no later than 5:00 p.m. Central Time on October 21, 2020.**

YOU MAY WISH TO CONSULT AN ATTORNEY REGARDING THIS MATTER.

UNLESS YOU EXPRESSLY REQUEST THAT YOUR PROOF OF CLAIM BE MADE PUBLIC, YOUR IDENTITY WILL BE KEPT STRICTLY CONFIDENTIAL, UNDER SEAL, AND OUTSIDE THE PUBLIC RECORD BY THE UNITED STATES BANKRUPTCY COURT. INFORMATION IN THIS CLAIM WILL BE PROVIDED PURSUANT TO COURT-APPROVED CONFIDENTIALITY GUIDELINES TO THE DEBTOR, DEBTOR'S COUNSEL, COUNSEL FOR THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, AND TO SUCH OTHER PERSONS AS THE BANKRUPTCY COURT DETERMINES NEED THE INFORMATION IN ORDER TO EVALUATE THE CLAIM.

TO BE VALID, THIS CONFIDENTIAL PROOF OF CLAIM MUST BE SIGNED BY THE CLAIMANT, A PERSON SUBMITTING THE CLAIM ON BEHALF OF A CLAIMANT, OR THE CLAIMANT'S ATTORNEY.
Penalty for presenting fraudulent claim: Fine of up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 3571.

Please print clearly and use blue or black ink.

PART 1: CONFIDENTIALITY

THIS PROOF OF CLAIM (ALONG WITH ANY ACCOMPANYING EXHIBITS AND ATTACHMENTS) WILL BE MAINTAINED AS CONFIDENTIAL UNLESS YOU EXPRESSLY REQUEST THAT IT BE PUBLICLY AVAILABLE BY CHECKING THE BOX AND SIGNING BELOW.

I want my Proof of Claim (along with any accompanying exhibits and attachments) to be made **public**.

Please verify this election by signing directly below.

Signature: _____

Print Name: _____

PART 2: IDENTIFYING INFORMATION

A. Claimant

First Name Middle Initial Last Name Jr/Sr/III

Street Address: (If party is incapacitated, provide the address of the party submitting the claim.)

City State/Prov. Zip Code (Postal Code) Country (if other than U.S.A.)

Telephone No.

Home: _____ Work: _____ Cell: _____

Birth Date - - Male Female
Month Day Year

Last Four Digits of Social Security Number: XXX-XX-_____

Any other name or names by which Claimant has been known: _____

B. Claimant's Attorney (if any):

Law Firm Name

Attorney's First Name Middle Initial Last Name

Street Address

City State/Prov. Zip Code (Postal Code) Country (if other than U.S.A.)

Telephone No. Fax No. E-mail address

PART 3: BACKGROUND INFORMATION

1. Are you currently married?

Yes No (If "Yes," please identify the name of your spouse and marriage date.)

2. Have you been previously married?

Yes No (If "Yes," please identify the name of your former spouse and, as applicable, the date(s) of any dissolution, divorce, separation, or widowhood.)

3. Do you have children?

Yes No (If "Yes," please identify their names and birthdates. If any children have died, please provide their date of death.)

4. Part 4 below will ask you about the nature of your complaint against The Diocese of St. Cloud. Other than the incident(s) of sexual abuse described in Part 4, have you ever been sexually abused by anyone else? If "Yes," please describe this abuse, including the date of the abuse and identify the abuser.

PART 4: NATURE OF COMPLAINT
(Attach additional separate sheets if necessary)

1. Who committed the acts of sexual abuse? _____

2. Position, Title or Relationship to You (if known).

3. Where did the sexual abuse take place? Please be specific and complete all relevant information that you know, including the City and State, name of the Parish, Mission or School (if applicable) and/or the name of any other location.

4. When did the sexual abuse take place?

a. If the sexual abuse took place over a period of time (months or years) please state when it started, when it stopped, and if it happened all during that time.

b. Please also state your age(s) and your grade(s) in school at the time the sexual abuse took place.

5. What happened (describe what happened):

6. Did you tell anyone about the sexual abuse (this would include parents, relatives, friends, the Diocese, attorneys, counselors, and law enforcement authorities)?

a. If "Yes," who did you tell? Please list the name(s) and any contact information you have.

b. What did you say?

c. When did you tell this person or persons about the abuse?

PART 5: IMPACT OF COMPLAINT
(Attach additional separate sheets if necessary)

(If you are uncertain how to respond to the first question in this Part 5, you presently may leave the first question in this Part 5 blank, but you will be required to complete the first question in this Part 5 within thirty (30) days after a written request is made for the information requested in the first question of this Part 5.)

1. What injuries have occurred to you because of the act or acts of sexual abuse that resulted in the claim (for example, the effect on your education, employment, personal relationships, and health)?

2. Have you sought counseling or other treatment? If so, with whom and when?

PART 6: ADDITIONAL INFORMATION

1. Prior Non-Bankruptcy Claims: Have you previously filed any lawsuit seeking damages for the sexual abuse described in this claim?

Yes No (If "Yes," please answer the questions below.)

- a. Where and when did you file the lawsuit?

- b. Who were the parties to the lawsuit and what was the case number?

- c. What was the result of that lawsuit?

2. Prior or Current Bankruptcy Claims: Have you filed any claims in any other bankruptcy case relating to the sexual abuse described in this claim?

Yes No (If "Yes," you are required to attach a copy of any completed claim form filed in any other bankruptcy case.)

a. Did you receive any money on the claim you filed in any other bankruptcy case for sexual abuse?
 Yes No

b. If "Yes" how much did you receive and when.

c. If you have not received any money on the claim you filed in any other bankruptcy, have you been told you will receive money?
 Yes No (if "Yes" how much do you expect to receive? _____)

3. Any Settlements: Regardless of whether a complaint was ever filed against any party because of the sexual abuse, have you settled any claim or demand relating to the sexual abuse described in this claim?
 Yes No (If "Yes," please describe, including parties to the settlement, and you are required to attach a copy of any settlement agreement.):

Date: _____

Sign and print the name and title, if any, of the Claimant or other person authorized to file this claim. If you are signing this claim on behalf of a Claimant you must list your relationship to the Claimant.

Under penalty of perjury, I declare the foregoing statements to be true and correct.

Signature: _____

Print Name: _____

Relationship to Claimant (if not signed by Claimant): _____