

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF LOUISIANA**

IN RE:	§	Case No. 20-10846
	§	
THE ROMAN CATHOLIC CHURCH OF THE ARCHDIOCESE OF NEW ORLEANS	§	Section “A”
	§	
	§	Chapter 11
	§	
Debtor.¹	§	
	§	

**APPLICATION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO
EMPLOY PACHULSKI STANG ZIEHL & JONES LLP AS CO-COUNSEL**

A HEARING WILL BE CONDUCTED ON THIS MATTER ON JULY 16, 2020, AT 1:30 P.M. BY TELEPHONE THROUGH THE DIAL-IN FOR SECTION A 1-888-684-8852; CONFERENCE CODE 9318283. IF YOU OBJECT TO THE RELIEF REQUESTED IN THIS PLEADING, YOU MUST RESPOND IN WRITING. UNLESS DIRECTED OTHERWISE BY THE COURT, YOU MUST FILE YOUR RESPONSE WITH THE CLERK OF THE BANKRUPTCY COURT NO LATER THAN SEVEN (7) DAYS BEFORE THE HEARING DATE. YOU MUST SERVE A COPY OF YOUR RESPONSE ON THE PERSON WHO SENT YOU THE NOTICE; OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

The Official Committee of Unsecured Creditors (the “Committee”) in the above-captioned case concerning the debtor-in possession, the Roman Catholic Church of the Archdiocese of New Orleans (the “Debtor”), files this Application (the “Application”) to employ Pachulski Stang Ziehl & Jones LLP (“PSZJ” or the “Firm”) as co-counsel pursuant to 11 U.S.C. §§ 328, 330 and 1103 and Rule 2014 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and L.R. 2014-1. In support of this Application, the Committee represents as follows, which is further supported by the declaration of Linda F. Cantor (the “Cantor”

¹ The last four digits of the Debtor’s federal tax identification number are 8966. The Debtor’s principal place of business is located at 7887 Walmsley Ave., New Orleans, LA 70125.

Declaration”), attached hereto as **Exhibit 1**, the Declaration of James Adams, attached hereto as **Exhibit 2**, and incorporated herein by reference for all purposes:

JURISDICTION AND VENUE

1. The Court has jurisdiction to consider this Application pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

2. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

BACKGROUND

3. On May 1, 2020 (the “Petition Date”), The Roman Catholic Church of the Archdiocese of New Orleans (the “Archdiocese”) filed a voluntary petition for relief under the Bankruptcy Code.

4. The Debtor remains in possession of its property and is managing its business as a debtor in possession pursuant to §§ 1107(a) and 1108 of the Bankruptcy Code, 11 U.S.C. § 101 *et. seq.*

5. On May 20, 2020, the Office of the United States Trustee for Region 5 (the “U.S. Trustee”) appointed the Committee pursuant to section 1102(a)(1) of the Bankruptcy Code [Docket #94], consisting of: (i) James Adams, (ii) Jackie Berthelot, (iii) Theodore Jackson, (iv) Eric Johnson, (v) George Coulon, (vi) Patricia Moody, and (vii) Hancock Whitney Bank, as Trustee for Louisiana Public Facilities Authority Revenue Refunding Bonds (Archdiocese of New Orleans Project) Series 7. On June 10, 2020, the U.S. Trustee filed its Notice of Reconstituted Committee of Unsecured Creditors, replacing member Hancock Whitney Bank with TMI Trust Company.

6. On May 22, 2020, the Committee conducted its first meeting and at that meeting unanimously selected PSZJ and Locke Lord LLP (“Locke Lord”) to serve as co-counsel.

RELIEF REQUESTED

7. The Committee has selected PSZJ as its counsel in furtherance of the efficient administration of the estate on behalf of the Committee. The Committee seeks to retain the Firm effective as of May 22, 2020 because the Firm began providing services to the Committee as of such date. The Committee believes that such retention is appropriate in this chapter 11 case because the Committee required effective representation prior to such time as a retention application could be submitted to the Court due to the exigencies of this chapter 11 case, and the Firm has been providing services to the Committee since May 22, 2020.

8. By this Application, the Committee respectfully requests that this Court enter an Order authorizing the Committee to employ and retain PSZJ as its co-counsel pursuant to §§ 328(a), 330, and 1103 of the Bankruptcy Code. The proposed form of Order is attached.

TERMS OF RETENTION

9. PSZJ is expected to render legal services as the Committee may consider desirable to discharge the Committee's statutory and fiduciary responsibilities and further the interest of the Committee's constituents in this chapter 11 case. In addition to acting as the primary spokesperson for the Committee (along with co-counsel Locke Lord), it is anticipated that PSZJ will perform the following services, which include but are not limited to:

- a. Assisting, advising, and representing the Committee in its consultations with the Debtor regarding the administration of this case;
- b. Assisting, advising, and representing the Committee in analyzing the Debtor's assets and liabilities, investigating the extent and validity of liens and participating in and reviewing any proposed asset sales, any asset dispositions, financing arrangements and cash collateral stipulations or proceedings;
- c. Assisting, advising, and representing the Committee in any manner relevant to reviewing and determining the Debtor's rights and obligations under leases and other executory contracts;

- d. Assisting, advising, and representing the Committee in investigating the acts, conduct, assets, liabilities, and financial condition of the Debtor, the Debtor's operations and the desirability of the continuance of any portion of those operations, and any other matters relevant to this case or to the formulation of a plan;
- e. Assisting, advising, and representing the Committee in its participation in the negotiation, formulation, and drafting of a plan of liquidation or reorganization;
- f. Advising the Committee on the issues concerning the appointment of a trustee or examiner under section 1104 of the Bankruptcy Code;
- g. Assisting, advising, and representing the Committee in understanding its powers and its duties under the Bankruptcy Code and the Bankruptcy Rules and in performing other services as are in the interests of those represented by the Committee;
- h. Assisting, advising, and representing the Committee in the evaluation of claims and on any litigation matters, including avoidance actions and claims against directors and officers and any other party; and
- i. Providing such other services to the Committee as may be necessary or appropriate in this case.

It is necessary for the Committee to retain counsel to perform these services and to otherwise assist the Committee in fulfilling its statutory duties under the Bankruptcy Code.

10. Because the Committee is retaining two firms as co-counsel, the Committee, PSZJ, and Locke Lord are each cognizant of the need to efficiently organize responsibilities and avoid duplication of efforts and services. While it is anticipated that both firms will work on matters as necessary to advance the Committee's interests, PSZJ and Locke Lord will work to maximize efficiencies in this case and are developing a division of labor to prevent duplication of effort.

11. In addition, the two firms will serve as "conflict counsel" for each other to the extent necessary, and in the event that either potential or actual conflict issues arise.

12. Locke Lord will file a separate application for employment by the Committee.

DISINTERESTEDNESS

15. As set forth in Cantor Declaration, PSZJ is a “disinterested person” as that term is defined in section 101(14) of the Bankruptcy Code.

16. To the best of the Committee’s and PSZJ’s knowledge and based upon the Cantor Declaration, PSZJ does not hold or represent an interest adverse to the estate, in accordance with section 327 of the Bankruptcy Code.

17. To the best of the Committee’s and PSZJ’s knowledge, information and belief and based upon the Cantor Declaration and as described below: (a) PSZJ has no connections with the Debtor (other than as set forth herein or in the Cantor Declaration), creditors of the Debtor, the United States Trustee for the Eastern District of Louisiana (the “U.S. Trustee”), any person employed in the office of the U.S. Trustee or any other party with an actual or potential interest in the chapter 11 case or their respective attorneys or accountants; (b) PSZJ is not a creditor, equity security holder or insider of the Debtor; (c) none of PSZJ’s partners or associates is, or was within two years of the Petition Date, a director, officer or employee of the Debtor; and (d) PSZJ neither holds nor represents an interest adverse to the Debtor, its estate or any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with or interest in the Debtor, or for any other reason.

18. The Debtor previously disclosed its list of potentially interested parties. (*See, e.g.*, Docket #76). PSZJ has used the same list of potentially interested parties and has reviewed the information provided to determine any prior or present representation of any creditors or parties-in-interest.

19. While PSZJ has undertaken, and continues to undertake, efforts to identify connections with the Debtor and other parties in interest, it is possible that connections with some parties in interest have not yet been identified. Should PSZJ, through its continuing efforts

or as this case progress, learn of any new connections of the nature described above, the Firm will promptly file supplemental declarations, as required by Bankruptcy Rule 2014(a).

20. To the extent that PSZJ becomes aware of a potential conflict, PSZJ will advise the Court and take appropriate action, including without limitation through use of conflicts counsel, as necessary.

21. PSZJ may represent, or may have represented, debtors, creditors' committees, or trustees in cases or proceedings against creditors of the Debtor that are unrelated to this case. However, those matters do not present a conflict in this case.

22. The Firm has represented, represents, and in the future will likely represent debtors and creditors' committees in cases unrelated to the Debtor and this case wherein one or more of the firm representing the members of the Committee or other parties-in-interest serve as or will serve as professionals to committee members.

23. The Committee submits that the employment of PSZJ is in the best interest of the the estate.

TERMS OF RETENTION

24. Subject to the Court's approval of this Application and in accordance with section 330(a) of the Bankruptcy Code and any applicable orders of this Court, PSZJ intends to (a) charge for its legal services on an hourly basis in accordance with ordinary and customary hourly rates in effect on the date services are rendered (modified as set forth herein) and (b) seek reimbursement of actual and necessary expenses and other charges that PSZJ incurs.

25. PSZJ's hourly rates are set at a level designed to fairly compensate PSZJ for the work of its attorneys and paralegals and to cover fixed and routine overhead expenses. Hourly rates vary with the experience and seniority of the individuals assigned, and by geographic

location and market. These hourly rates are subject to periodic adjustments to reflect economic and other conditions and are consistent with the rates charged elsewhere. PSZJ's hourly fees are comparable to those charged by attorneys of similar experience and expertise for engagements of scope and complexity similar to this chapter 11 case and are reasonable.

26. The standard hourly rates for the PSZJ attorneys who are expected to primarily work on this matter are \$1,195 for James I. Stang, \$1,075 for Linda F. Cantor, and \$925 for Joshua M. Fried. Notwithstanding the foregoing, if PSZJ's cumulative fees exceed a blended rate of \$700 per hour (for attorneys only), the Firm agrees to cap its fees to the extent the fees incurred under the standard hourly rates exceed a blended hourly rate of \$700. The Firm will employ this practice on a monthly basis. At the conclusion of the case in connection with the Firm's final fee application, the Firm will blend all attorney timekeepers for the duration of this case.

27. PSZJ will also seek reimbursement for actual and necessary expenses incurred in connection with its engagement by the Committee in this chapter 11 case, which may include, but are not limited to, postage, overnight mail, courier delivery, transportation, overtime expenses, computer assisted legal research, photocopying, outgoing facsimile transmissions, airfare, meals and lodging.

28. PSZJ intends to maintain detailed, contemporaneous time records and to apply to the Court for the allowance of compensation for professional services and reimbursement of expenses in accordance with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, and any additional procedures that may be established by the Court in this chapter 11 case. PSZJ has agreed to accept as compensation such sums as may be allowed by the Court. PSZJ understands that interim and final fee awards are subject to approval by this Court.

29. The Committee understands that PSZJ hereafter intends to apply to the Court for allowances of compensation and reimbursement of expenses in accordance with the applicable provisions of the Bankruptcy Code, including, but not limited to Sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and the Guidelines for Professional Compensation established by the Office of the United States Trustee, and further orders of this Court, for all services performed and expenses incurred after the Petition Date. It is further contemplated that Section XIII(B) of the Court's *General Order Regarding Procedures for Complex Chapter 11 Cases* (Amended as of April 30, 2020) applies.

REQUEST FOR APPROVAL AS OF MAY 22, 2020

31. The Committee requests that PSZJ's retention be approved as of May 22, 2020, which is the date that PSZJ began providing services to the Committee. Under the Court's *General Order Regarding Procedures for Complex Chapter 11 Cases* (amended as of April 30, 2020), *nunc pro tunc* relief is not required unless the application is filed later than thirty (30) days after the commencement of work.

NOTICE

32. Notice of this Motion has been provided to the Special Notice List as defined and required under the Court's May 1, 2020 *Ex Parte Order Authorizing the Debtor to Limit Notice and Establishing Notice Procedures* [Docket #22].

NO PRIOR REQUEST

33. No previous request for the relief sought herein has been made by the Committee to this or any other court.

WHEREFORE, the Official Committee of Unsecured Creditors respectfully requests that the Court enter the proposed order submitted herewith: (a) granting this Application, (b)

authorizing it to retain and employ Pachulski Stang Ziehl & Jones LLP as of May 22, 2020, and
(c) for such other relief as this Court may deem just and proper.

Dated: June 22, 2020

Respectfully submitted,

By: /s/ C. Davin Boldissar
Omer F. Kuebel, III (La #21682)
C. Davin Boldissar (La. #29094)
Locke Lord LLP
601 Poydras Street, Suite 2660
New Orleans, Louisiana 70130-6036
Telephone: (504) 558-5111
Facsimile: (504) 558-5200
Email: dboldissar@lockelord.com
rkuebel@lockelord.com

and

James I. Stang (CA Bar No. 94435)
Linda F. Cantor (CA Bar No.153762)
Pachulski Stang Ziehl & Jones LLP 10100
Santa Monica Blvd., Suite 1300
Los Angeles, CA 90067
Telephone: (310)-277-6910
Facsimile: (310)-201-0760
Email: jstang@pszjlaw.com
lcantor@pszjlaw.com

*Proposed Co-Counsel to the Official Committee of
Unsecured Creditors*

CERTIFICATE OF SERVICE

I hereby caused a true and correct copy of the foregoing Application to be served on June 22, 2020 upon all parties by electronic case filing for those parties receiving notice via the Court's Electronic Case Filing system, and on all other parties requiring service under the Special Notice List as defined and required under the Court's May 1, 2020 *Ex Parte Order Authorizing the Debtor to Limit Notice and Establishing Notice Procedures* via first-class United States mail, postage prepaid, to be sent on June 23, 2020.

/s/ C. Davin Boldissar
C. Davin Boldissar

EXHIBIT 1

Declaration of Linda F. Cantor

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF LOUISIANA**

IN RE:	§	Case No. 20-10846
	§	
THE ROMAN CATHOLIC CHURCH OF THE ARCHDIOCESE OF NEW ORLEANS	§	
	§	Section "A"
	§	
Debtor.²	§	
		Chapter 11

**DECLARATION OF LINDA F. CANTOR IN SUPPORT OF APPLICATION
OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS TO
EMPLOY PACHULSKI STANG ZIEHL & JONES LLP AS CO-COUNSEL**

Pursuant to 28 U.S.C. § 1746, I, Linda F. Cantor, hereby submit this declaration (this "Declaration") under penalty of perjury:

1. I am a partner of the law firm of Pachulski Stang Ziehl & Jones LLP ("PSZJ"), with offices at 10100 Santa Monica Blvd., 13th Floor, Los Angeles, California 90067. I am duly admitted to practice law in the United States District Courts for the Northern, Southern, Eastern, and Central Districts of California, and in the United States District Court for the Northern District of Illinois. I filed a request for admission to practice *pro hac vice* in the United States Bankruptcy Court for the Eastern District of Louisiana on June 10, 2020. There are no disciplinary proceedings pending against me.

2. I am authorized to make this declaration (the "Declaration") on behalf of PSZJ and the Declaration is submitted pursuant to Rules 2014(a) and 2016(b) of the Federal Rules of

² The last four digits of the Debtor's federal tax identification number are 8966. The Debtor's principal place of business is located at 7887 Walmsley Ave., New Orleans, LA 70125.

Bankruptcy Procedure in support of *the Application of the Official Committee of Unsecured Creditors to Employ Pachulski Stang Ziehl & Jones LLP* (the “Application”)³, as co-counsel for the Official Committee of Unsecured Creditors (the “Committee”). The Application seeks an order pursuant to sections 328, 330 and 1103 of title 11 of the United States Code, 11 U.S.C. §§ 101, et seq. (as amended, the “Bankruptcy Code”) authorizing and approving the employment and retention of PSZJ as bankruptcy co-counsel to the Committee in this chapter 11 case.

3. Unless otherwise stated in this Declaration, I have personal knowledge of the facts set forth herein and, if called as a witness, I would testify thereto.

I.
QUALIFICATION OF PROFESSIONALS

4. The Firm has approximately 65 attorneys with a practice concentrated on corporate reorganizations, bankruptcy, litigation, and commercial matters. The Firm’s attorneys have comprehensive experience representing creditors’ committees, debtors, creditors, trustees, and others in a wide variety of bankruptcy cases. Since 2004, the Firm has represented committees in chapter 11 cases involving the following entities affiliated with the Roman Catholic Church: Diocese of Spokane (Washington); Diocese of Davenport (Iowa); Diocese of San Diego (California); Diocese of Fairbanks (Alaska); Diocese of Wilmington (Delaware); Society of Jesus, Oregon Province (a five state Province); Archdiocese of Milwaukee (Wisconsin); The Christian Brothers’ Institute, The Christian Brothers of Ireland, Inc.; the Diocese of Gallup (New Mexico); the Roman Catholic Bishop of Helena (Montana); the Roman Catholic Bishop of Stockton (California); the Roman Catholic Bishop of Great Falls-Billings (Montana); Roman Catholic Church of the Archdiocese of Santa Fe (New Mexico); and the Diocese of Rochester (New York). The Firm also represents official committees of sexual abuse

³ Capitalized terms not otherwise defined herein shall have the same meaning ascribed to them in the Application.

survivors in the chapter 11 cases of USA Gymnastics and Boy Scouts of America, and also represented an official committee of unsecured creditors that included sexual abuse survivors and commercial creditors in the chapter 11 case of The Weinstein Companies.

5. Attorneys of the Firm also have extensive experience representing creditors' committees in complex chapter 11 cases throughout the country, including Cobalt Energy; Erin Energy; Ignite Restaurants; Rita Restaurants, Reddy Ice; Ditech; Hollander; Barneys; BCBG Max Azria; Aéropostale; The Great Atlantic & Pacific Tea Company, Inc.; Payless ShoeSource; The Sports Authority, Inc.; Whiting Petroleum Corporation; Circuit City Stores, Inc.; The Wet Seal; Ashley Stewart; and Neff Corp. Accordingly, the Firm is well-qualified to render the services described below.

II. SERVICES TO BE RENDERED

6. The Committee has retained PSZJ as co-counsel and requested that PSZJ render various services to the Committee in connection with this case including, *inter alia*:

- a. Assisting, advising, and representing the Committee in its consultations with the Debtor regarding the administration of this case;
- b. Assisting, advising, and representing the Committee in analyzing the Debtor's assets and liabilities, investigating the extent and validity of liens and participating in and reviewing any proposed asset sales, any asset dispositions, financing arrangements and cash collateral stipulations or proceedings;
- c. Assisting, advising, and representing the Committee in any manner relevant to reviewing and determining the Debtor's rights and obligations under leases and other executory contracts;
- d. Assisting, advising, and representing the Committee in investigating the acts, conduct, assets, liabilities, and financial condition of the Debtor, the Debtor's operations and the desirability of the continuance of any portion of those operations, and any other matters relevant to this case or to the formulation of a plan;
- e. Assisting, advising, and representing the Committee in its participation in the negotiation, formulation, and drafting of a plan of liquidation or reorganization;

- f. Advising the Committee on the issues concerning the appointment of a trustee or examiner under section 1104 of the Bankruptcy Code;
- g. Assisting, advising, and representing the Committee in understanding its powers and its duties under the Bankruptcy Code and the Bankruptcy Rules and in performing other services as are in the interests of those represented by the Committee;
- h. Assisting, advising, and representing the Committee in the evaluation of claims and on any litigation matters, including avoidance actions and claims against directors and officers and any other party; and
- i. Providing such other services to the Committee as may be necessary or appropriate in this case.

7. Subject to this Court's approval of the Application, PSZJ is willing to serve as the Committee's co-counsel and to perform the services described above.

III.
DISINTERESTEDNESS OF PACHULSKI STANG ZIEHL & JONES LLP
AND SPECIFIC DISCLOSURES

8. Neither I, the Firm, nor any partner, of counsel or associate thereof, insofar as I have been able to ascertain, has any connection with the Debtor, its creditors, or any other parties in interest herein, or its respective attorneys and accountants, the U.S. Trustee, or any person employed in the Office of the United States Trustee (the "U.S. Trustee") or any Bankruptcy Judge currently serving on the United States Bankruptcy Court for the Eastern District of Louisiana, except as set forth herein.

9. The Debtor has retained various professionals, including Jones Walker LLP, Blank Rome LLP, and Carr, Riggs & Ingram, LLC. The Firm may continue to work with these referenced professionals on various representations, at times representing the same parties and at other times representing parties with similar interests or parties with adverse interests. In addition, one of the attorneys for a committee member in the present case, Anne Andrews, Esq., of the law firm of Andrews & Thornton, is also counsel for a different committee member of the tort claimants' committee in the Boy Scouts of America. As noted above, my firm is counsel to the tort committee in the Boy Scouts of America chapter 11 case.

10. Section 1103(b) of the Bankruptcy Code does not impose the general “disinterestedness” standard of section 327(a) on proposed counsel to an official committee of unsecured creditors. However, Bankruptcy Rule 2014 requires that an application for employment under section 1103 disclose all connections with the Debtor, its estate, professionals, and the U.S. Trustee.

11. The Firm has made the following investigation of its connections prior to submitting this Declaration. The Firm has undertaken a full and thorough review of its computer database, which contains the names of clients and other parties in interest in particular matters. The Firm requires all of its professionals, before accepting the representation of a new client, or the representation of an existing client in a new matter, to perform a conflicts check through the Firm’s database and to enter conflict information regarding new clients or new matters into that database. Thus, a review of said computerized database should reveal any and all actual or potential conflicts of interest with respect to any given representation. In particular, an employee of the Firm, under my supervision, entered the names of parties provided by the Debtor through the Firm’s database. The parties entered in the Firm’s database with respect to the Firm’s conflicts check in this case are set forth on **Schedule A** annexed hereto.

12. Based on the Firm’s conflict check within its database, the Firm has not encountered any creditors of the Debtor in which an actual conflict exists between the Firm and such creditors. If, at any time during the course of this proceeding, the Firm learns of any representation which may give rise to a conflict, the Firm will promptly file with the Court an amended declaration identifying and specifying such involvement.

13. PSZJ and certain of its attorneys have represented and in the future will likely represent creditors of the Debtor in connection with matters unrelated to the Debtor and this case.

14. PSZJ represented, represents, and in the future will likely represent committees in matters unrelated to the Debtor and this case, whose members may be creditors and/or committee members in this case. For the avoidance of doubt, the Firm has not represented any members of the Committee in the twelve (12) months preceding the Petition Date.

15. I do not believe that there is any connection or interest (as such terms are used in section 101(14)(C) of the Bankruptcy Code and Bankruptcy Rule 2014(a)) between PSZJ and (i) the United States Trustee or any person employed by the Office of the United States Trustee, or (ii) any counsel, accountants, financial consultants and investment bankers who represent or may represent claimants or other parties in interest in these cases. In addition, as part of its practice, PSZJ appears in cases, proceedings, and transactions involving many different attorneys, co-counsel, accountants, financial consultants and investment bankers, some of which now or may in the future represent claimants and parties in interest in this case. PSZJ has not and will not represent any such entities in relation to this chapter 11 case nor have any relationship with any such entities that would be adverse to the Debtor's estate in the matters upon which PSZJ is to be employed.

16. Neither PSZJ nor any attorney or employee at the Firm is or was a creditor, an equity holder, or an insider of the Debtor.

17. Neither PSZJ nor any attorney or employee at the Firm is or was, within two years before the Petition Date, a director, officer or employee of the Debtor.

18. PSZJ does not have an interest materially adverse to the interests of the Debtor's estate or of any class of creditors or equity security holders by reason of any direct or indirect relationship to, or connection with, the Debtor, or for any other reason.

19. PSZJ has instituted and is carrying on further inquiries of its partners and associates with respect to the matters contained herein. PSZJ will file supplemental declarations regarding this retention if any additional relevant information comes to its attention.

20. In view of the foregoing, PSZJ is a "disinterested person" within the meaning of section 101(14) of the Bankruptcy Code.

IV.
TERMS OF RETENTION

21. Subject to the Court's approval of this Application and in accordance with section 330(a) of the Bankruptcy Code and any applicable orders of this Court, PSZJ intends to

(a) charge for its legal services on an hourly basis in accordance with ordinary and customary hourly rates in effect on the date services are rendered (modified as set forth herein) and (b) seek reimbursement of actual and necessary expenses and other charges that PSZJ incurs.

22. PSZJ's hourly rates are set at a level designed to fairly compensate PSZJ for the work of its attorneys and paralegals and to cover fixed and routine overhead expenses. Hourly rates vary with the experience and seniority of the individuals assigned, and by geographic location and market. These hourly rates are subject to periodic adjustments to reflect economic and other conditions and are consistent with the rates charged elsewhere. PSZJ's hourly fees are comparable to those charged by attorneys of similar experience and expertise for engagements of scope and complexity similar to this chapter 11 case and are reasonable.

23. Due to the unique circumstances of this case, PSZJ proposes, subject to application and approval by this Court pursuant to Sections 330 and 331 of the Bankruptcy Code, charging hourly rates which are substantially below its regular hourly rates. If PSZJ's cumulative fees exceed a blended rate of \$700 per hour (for attorneys only), the Firm agrees to cap its fees to the extent the fees incurred under the standard hourly rates exceed a blended hourly rate of \$700. The Firm will employ this practice on a monthly basis. At the conclusion of the case in connection with the Firm's final fee application, the Firm will blend all attorney timekeepers for the duration of this case. The standard hourly rates for the PSZJ attorneys who will primarily work on this matter are \$1,195 for James Stang, \$1,075 for Linda Cantor, and \$925 for Joshua Fried.

24. PSZJ will also seek reimbursement for actual and necessary expenses incurred in connection with its engagement by the Committee, which may include, but are not limited to,

postage, overnight mail, courier delivery, transportation, overtime expenses, computer assisted legal research, photocopying, outgoing facsimile transmissions, airfare, meals and lodging.

25. PSZJ intends to maintain detailed, contemporaneous time records and to apply to the Court for the allowance of compensation for professional services and reimbursement of expenses in accordance with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, and any additional procedures that may be established by the Court in this chapter 11 case. PSZJ has agreed to accept as compensation such sums as may be allowed by the Court. PSZJ understands that interim and final fee awards are subject to approval by this Court.

26. The Committee understands that PSZJ hereafter intends to apply to the Court for allowances of compensation and reimbursement of expenses in accordance with the applicable provisions of the Bankruptcy Code, including, but not limited to Sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules, and the Guidelines for Professional Compensation established by the Office of the United States Trustee, and further orders of this Court, for all services performed and expenses incurred after the Petition Date. It is further contemplated that Section XIII(B) of the Court's *General Order Regarding Procedures for Complex Chapter 11 Cases* (amended as of April 30, 2020) applies.

27. I understand there is a continuing duty to disclose any adverse interest and change of disinterestedness.

28. I agree to immediately disclose any actual conflict of which I become aware during the course of PSZJ's representation of the Committee.

29. I understand that the court's approval of the application is not approval of any proposed terms of compensation and under § 328(a) the court may allow compensation on terms different from those proposed.

30. PSZJ has not received any retainer from the Debtor, the Committee, or any member of the Committee, nor has PSZJ received any payment or promise of payment. No compensation has been paid or promised to be paid from a source other than the Debtor's estate in this case. No promises have been received by the Firm nor by any partners, of counsel or associate thereof as to compensation in connection with this case other than in accordance with the provisions of the Bankruptcy Code. The Firm has no agreement with any other entity to share with such entity any compensation received by the Firm in connection with this case, except among the partners, of counsel, and associates of the Firm. Neither the Committee nor any of its representatives are or will be liable for fees or costs incurred by the Firm in its representation of the Committee.

31. PSZJ further states pursuant to Rule 2016(b) of the Federal Rules of Bankruptcy Procedure that it has not shared, nor agreed to share (a) any compensation it has received or may receive with another party or person, other than with the partners, counsel and associates of PSZJ, or (b) any compensation another person or party has received or may receive.

32. I am not aware of anyone who objects to PSZJ's employment.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief, and that this declaration was executed on June 22, 2020 at Los Angeles, California

By: /s/ Linda F. Cantor
Linda F. Cantor

Schedule A

Potential Parties-in-Interest

Index

<u>Schedule</u>	<u>Category</u>
1(A)	<u>Debtor</u>
1(B)	<u>Officers, Board, Council and Committee Members</u>
1(C)	<u>Current and Recent Former Entities Affiliated with the Debtor</u>
1(D)	<u>Lenders</u>
1(E)	<u>Litigation Parties and Counsel</u>
1(F)	<u>Governmental - Regulatory</u>
1(G)	<u>Top 20 Creditors</u>
1(H)	<u>Insurers</u>
1(I)	<u>Professionals that Provide Services to the Debtor</u>
1(J)	<u>Major Utility Providers</u>
1(K)	<u>Bondholders - Trustee of Bondholders</u>
1(L)	<u>Contract Parties</u>
1(M)	<u>U.S. Trustee and Judges for the Eastern District of Louisiana</u>

SCHEDULE A(I)

Debtor

The Roman Catholic Church of the Archdiocese of New Orleans

SCHEDULE A(2)

Officers, Board, Council and Committee Members

Mr. Rodney J. Abele, Jr.
Ms. Marguerite L. Adams, Esq.
Very Rev. Peter O. Akpoghiran, J.C.D.
Most Rev. Gregory M. Aymond, D.D,
Ms. Emily Marcotte Barilleau
Very Rev. Patrick Carr, Vicar General
Mr. Joseph Carrere
Mr. Mason G. Couvillon
Most Rev. Fernand J. Cheri, III, O.F.M,V.G.
Deacon Ron Drez, Jr.
Mr. Terry A. DuFrene
Mr. Lloyd E. Eagan, Jr.
Mr. Jeffery J. Entwisle
Mr. Paul L. Fine
Mr. William F. Finegan
Mr. Octave J. Francis, III
Mr. Todd R. Gennardo
Mr. Alex Gershanik
Ms. Kathleen R. Hebert
Ms. Catherine B. Howard
Mr. Cory Howat
Ms. Mary S. Johnson
Mr. Robert D. Munch, Jr.
Ms. Raechelle Munna, Esq.
Ms. Dina B. Riviere
Mr. Mark Rodi
Mr. Lloyd A. Tate
Mr. Jeffray A. Teague
Mr. Calvin S. Tregre
Mr. St. Denis J. Villere
Rev. Otis W. Young, Jr.

SCHEDULE A(3)

Current and Recent Former Entities Affiliated with the Debtor

Parishes:

All Saints Roman Catholic Church, New Orleans, Louisiana
Annunciation of the Blessed Virgin Mary Roman Catholic Church, Bogalusa, Louisiana
Ascension of Our Lord Roman Catholic Church, LaPlace Louisiana
Assumption of Mary Roman Catholic Church, Avondale, Louisiana
Blessed Francis Xavier Seelos Roman Catholic Church, New Orleans, Louisiana
Blessed Sacrament — St. Joan of Arc Roman Catholic Church, New Orleans, Louisiana
Blessed Trinity Roman Catholic Church, New Orleans, Louisiana
Christ the King Roman Catholic Church, Gretna, Louisiana
Congregation of the Mission Western Province, Louisiana (St. Joseph)
Corpus Christi-Epiphany Roman Catholic Church, New Orleans, Louisiana
Divine Mercy Roman Catholic Church, Kenner, Louisiana
Good Shepherd Roman Catholic Church, New Orleans, Louisiana
Holy Family Roman Catholic Church, Luling, Louisiana
Holy Family Roman Catholic Church, Franklinton, Louisiana
Most Holy Name of Jesus Roman Catholic Church, New Orleans, Louisiana
Holy Name of Mary Roman Catholic Church, New Orleans, Louisiana
Holy Spirit Roman Catholic Church, New Orleans, Louisiana
Immaculate Conception Roman Catholic Church, Marrero, Louisiana
Immaculate Conception Roman Catholic Church, New Orleans, Louisiana
Mary Queen of Peace Roman Catholic Church, Mandeville, Louisiana
Mary Queen of Vietnam Roman Catholic Church, New Orleans, Louisiana
Mater Dolorosa Roman Catholic Church, New Orleans, Louisiana
Most Holy Trinity Roman Catholic Church, Covington, Louisiana
Our Lady of Divine Providence Roman Catholic Church, Metairie, Louisiana
Our Lady of Grace Roman Catholic Church, Reserve, Louisiana
Our Lady of Guadalupe Church & Shrine of St. Jude
Our Lady of Lourdes Roman Catholic Church, Slidell, Louisiana
Our Lady of Lourdes Roman Catholic Church, Violet, Louisiana
Our Lady of Perpetual Help Roman Catholic Church, Kenner, Louisiana
Our Lady of Perpetual Help Roman Catholic Church, Belle Chase, Louisiana
Our Lady of Prompt Succor Roman Catholic Church, Westwego, Louisiana
Our Lady of Prompt Succor Church Roman Catholic Church, Chalmette, Louisiana
Our Lady of the Angels Roman Catholic Church, Waggaman, Louisiana
Our Lady of the Holy Rosary Roman Catholic Church, Hahnville, Louisiana
Our Lady of the Lake Roman Catholic Church, Mandeville, Louisiana
Our Lady of the Rosary Roman Catholic Church, New Orleans, Louisiana
Our Lady Star of the Sea Roman Catholic Church, New Orleans, Louisiana
Resurrection of Our Lord Roman Catholic Church, New Orleans, Louisiana
Sacred Heart of Jesus Roman Catholic Church, Lacombe, Louisiana
Sacred Heart of Jesus Roman Catholic Church, Norco, Louisiana
St. Agnes Roman Catholic Church, Jefferson, Louisiana

St. Agnes le Thi Thanh Roman Catholic Church, Marrero, Louisiana
St Andrew the Apostle Roman Catholic Church, New Orleans, Louisiana
St. Angela Merici Roman Catholic Church, Metairie, Louisiana
St. Ann Roman Catholic Church and Shrine, Metairie, Louisiana
St. Anselm Roman Catholic Church, Madisonville, Louisiana
St. Anthony of Barataria Roman Catholic Church, Lafitte, Louisiana
St. Anthony Roman Catholic Church, Gretna, Louisiana
St. Anthony of Padua Roman Catholic Church, Luling, Louisiana
St. Anthony of Padua Roman Catholic Church, New Orleans, Louisiana
St. Augustine Roman Catholic Church, New Orleans, Louisiana
St. Benedict Roman Catholic Church, Covington, Louisiana
St. Benilde Roman Catholic Church, Metairie, Louisiana
St. Bernard Roman Catholic Church, St. Bernard, Louisiana
St. Bonaventure Roman Catholic Church, Avondale, Louisiana
St. Catherine of Siena Roman Catholic Church, Metairie, Louisiana
St. Charles Borromeo Roman Catholic Church, Destrehan, Louisiana
St. Christopher the Martyr Roman Catholic Church, Metairie, Louisiana
St. Clement of Rome Roman Catholic Church, Metairie, Louisiana
St. Cletus Roman Catholic Church, Gretna, Louisiana
St. David Roman Catholic Church, New Orleans, Louisiana
St. Dominic's Roman Catholic Church, New Orleans, Louisiana
St. Edward the Confessor Roman Catholic Church, Metairie, Louisiana
St. Francis of Assisi Roman Catholic Church, New Orleans, Louisiana
St. Francis Xavier Roman Catholic Church, Metairie, Louisiana
St. Gabriel Roman Catholic Church, New Orleans, Louisiana
St. Genevieve Roman Catholic Church, Slidell, Louisiana
St. Gertrude Roman Catholic Church, Des Allemands, Louisiana
St. Hubert Roman Catholic Church, Garyville, Louisiana
St. James Major Roman Catholic Church, New Orleans, Louisiana
St. Jane de Chantal Roman Catholic Church, Abita Springs, Louisiana
St. Jerome Roman Catholic Church, Kenner, Louisiana
St. Joachim Roman Catholic Church, Marrero, Louisiana
St. Joan of Arc Roman Catholic Church, LaPlace, Louisiana
St. John Bosco Roman Catholic Church, Harvey, Louisiana
St. John of the Cross Roman Catholic Church, Lacombe, Louisiana
St. John the Baptist Roman Catholic Church, Edgard, Louisiana
St. John the Baptist Roman Catholic Church, Paradis, Louisiana
St. John the Baptist Roman Catholic Church, Folsom, Louisiana
St. Joseph Roman Catholic Church, Algiers, Louisiana
St. Joseph Roman Catholic Church, Gretna, Louisiana
St. Joseph the Worker Roman Catholic Church, Marrero, Louisiana
St. Katherine Drexel Roman Catholic Church New Orleans, Louisiana
St. Raymond and St. Leo the Great Roman Catholic Church, New Orleans, Louisiana
St. Louis Cathedral
St. Louis King of France Roman Catholic Church, Metairie, Louisiana
St. Luke the Evangelist Roman Catholic Church, Slidell, Louisiana

St. Margaret Mary Roman Catholic Church, Slidell, Louisiana
St. Maria Goretti Roman Catholic Church, New Orleans, Louisiana
St. Mark Roman Catholic Church, Ama, Louisiana
St. Martha Roman Catholic Church, Harvey, Louisiana
St. Mary Magdalen Roman Catholic Church, Metairie, Louisiana
St. Mary of the Angels Roman Catholic Church, New Orleans, Louisiana
St. Mary's Roman Catholic Church, New Orleans Louisiana
St. Matthew The Apostle Roman Catholic Church, River Ridge, Louisiana
St. Patrick's Roman Catholic Church, New Orleans, Louisiana
St. Patrick's Roman Catholic Church, Port Sulphur, Louisiana
St. Paul The Apostle Parish Roman Catholic Church, New Orleans, Louisiana
St. Peter's Roman Catholic Church, Covington, Louisiana
St. Peter Claver Roman Catholic Church, New Orleans, Louisiana
St. Peter Roman Catholic Church, Reserve, Louisiana
St. Philip Neri Roman Catholic Church, Metairie, Louisiana
St. Pius X Roman Catholic Church, New Orleans, Louisiana
St. Rita Roman Catholic Church, New Orleans, Louisiana
St. Rita Roman Catholic Church, Harahan, Louisiana
St. Rosalie Roman Catholic Church, Harvey, Louisiana
St. Theresa of Avila Roman Catholic Church, New Orleans, Louisiana
St. Thomas Roman Catholic Church, Pointe a La Hache, Louisiana
Sts. Peter and Paul Roman Catholic Church, Pearl River, Louisiana
Society of the Redemptorist (St. Anthony)
Transfiguration of the Lord Roman Catholic Church, New Orleans, Louisiana
The Visitation of Our Lady Roman Catholic Church, Marrero, Louisiana

Churches:

Christ the King Church
Corpus Christi-Epiphany Church
Divine Mercy Church
Good Shepherd Parish St Stephen Church
Holy Family Church (Franklinton)
Holy Family Church (Luling)
Holy Name of Jesus Church
Holy Name of Mary Church
Holy Spirit Church
Immaculate Conception Church (Marrero)
Immaculate Conception Church (New Orleans)
Infant Jesus of Prague Mission
Mary Queen of Peace Church
Mary Queen of Vietnam Church
Mater Dolorosa Church
Most Holy Trinity Church
Our Lady of Divine Providence Church
Our Lady of Grace Church
Our Lady of Guadalupe (Shrine of St. Jude)

Our Lady of La Vang Mission
Our Lady of Lourdes Church (Slidell)
Our Lady of Lourdes Church (Violet)
Our Lady of Perpetual Help Church (Belle Chasse)
Our Lady of Perpetual Help Church (Kenner)
Our Lady of Prompt Succor Church (Chalmette)
Our Lady of Prompt Succor Church (Westwego)
Our Lady of the Angels Church
Our Lady of the Holy Rosary Church
Our Lady of the Lake Church
Our Lady of the Rosary Church
Our Lady Star of the Sea Church
Resurrection of Our Lord Church
Sacred Heart Church
Sacred Heart of Jesus Church
St. Agnes Church
St. Agnes Le Thi Thanh Church
St. Alphonsus Church
St. Andrew the Apostle Church
St. Angela Merici Church
St. Ann Church and Shrine
St. Ann Mission
St. Anselm Church
St. Anthony Church
St. Anthony Mission
St. Anthony of Padua Church (Luling)
St. Anthony of Padua Church (New Orleans)
St. Augustine Church
St. Benedict Church
St. Benilde Church
St. Bernard Church
St. Bonaventure Church
St. Catherine of Siena Church
St. Charles Borromeo Church
St. Christopher the Martyr Church
St. Clement of Rome Church
St. Cletus Church
St. David Church
St. Dominic Church
St. Edward the Confessor Church
St. Francis of Assisi Church
St. Francis Xavier Church
St. Gabriel the Archangel Church
St. Genevieve Church
St. Gertrude Church
St. Hubert Church

St. James Major Church
St. Jane de Chantal Church
St. Jerome Church
St. Joachim Church
St. Joan of Arc Church (LaPlace)
St. John Bosco Church
St. John of the Cross Church
St. John the Baptist Church (Edgard)
St. John the Baptist Church (Folsom)
St. John the Baptist Church (New Orleans)
St. John the Baptist Church (Paradis)
St. Joseph Church (Algiers)
St. Joseph Church (New Orleans)
St. Joseph Church and Shrine on the Westbank
St. Joseph the Worker Church
St. Katharine Drexel Church
St. Louis Cathedral-Basilica
St. Louis King of France Church
St. Luke the Evangelist Church
St. Margaret Mary Church
St. Maria Goretti Church
St. Mark Church
St. Martha Church
St. Mary Magdalen Church
St. Mary of the Angels Church
St. Mary's Assumption Church
St. Mary's Chapel (St. Mary's Assumption)
St. Mary's Church (St. Louis Cathedral-Basilica)
St. Matthew the Apostle Church
St. Michael the Archangel Mission
St. Nicholas of Myra Mission
St. Patrick Church (New Orleans)
St. Patrick Church (Port Sulphur)
St. Paul the Apostle Church
St. Peter Cemetery (St. Peter Church Reserve)
St. Peter Church (Covington)
St. Peter Church (Reserve)
St. Peter Claver Church
St. Philip Neri Church
St. Pius X Church
St. Pius X Mission
St. Raymond-St. Leo the Great Church
St. Rita Church (Harahan)
St. Rita Church (New Orleans)
St. Rosalie Church
St. Theresa of Avila Church

St. Thomas Church - Assumption of Our Lady Mission
Sts. Peter and Paul Church
Transfiguration of the Lord Church
Visitation of Our Lady Church

Archdiocesan High Schools:

Academy of our Lady St. Scholastica Academy
Archbishop Chapelle High School
Archbishop Hannan High School
Archbishop Shaw High School
Archbishop Rummel High School
Holy Rosary Academy High School
Pope John Paul II High School
St. Charles Catholic High School
St. Michaels Special School
St. Scholastica Academy

Parish Schools:

Academy of Our Lady
Annunciation School
Ascension of Our Lord School
Christ the King School
Holy Family Pre-School
Holy Name of Jesus School
Holy Rosary Academy (Closed)
Immaculate Conception School
Mary Queen of Peace School
Our Lady of Divine Providence School (Closed)
Our Lady of Lourdes School
Our Lady of Perpetual Help School (Belle Chasse)
Our Lady of Perpetual Help School (Kenner)
Our Lady of Prompt Succor School (Chalmette)
Our Lady of Prompt Succor School (Westwego)
Our Lady of the Lake School
Resurrection of Our Lord School
Sacred Heart of Jesus School (Closed)
St. Alphonsus School
St. Andrew the Apostle School
St. Angela Merici School
St. Ann School
St. Anthony Pre-School
St. Anthony School
St. Benilde School
St. Catherine of Siena School
St. Charles Borromeo School

St. Christopher the Martyr School
St. Clement of Rome School
St. Cletus School
St. Dominic School
St. Edward the Confessor School
St. Elizabeth Ann Seton School
St. Francis Xavier School
St. Joan of Arc School (LaPlace)
St. Joan of Arc School (New Orleans)
St. Leo the Great School
St. Louis King of France School
St. Margaret Mary School
St. Mary Magdalen School
St. Matthew the Apostle School
St. Michael School
St. Peter Claver School (Closed)
St. Peter School (Covington)
St. Peter School (Reserve)
St. Philip Neri School
St. Pius X School
St. Rita School (Harahan)
St. Rita School (New Orleans)
St. Rosalie School
St. Stephen School
The Good Shepherd Nativity Mission School
Visitation of Our Lady School

Other Non-Debtor Entities:

Academy of the Sacred Heart School
Annunciation Inn Apartments (Christopher Homes)
Archdiocese of New Orleans Chancery
Archdiocese of New Orleans Priests
Archdiocese of New Orleans Retreat Center
Blessed Seelos Center
Brother Martin High School
Cabrini High School
Camp Abbey Retreat Center
Catholic Charismatic Renewal
Catholic Charities Archdiocese of New Orleans
Catholic Foundation of the Archdiocese of New Orleans, Inc.
Center of Jesus the Lord at Our Lady of Good Counsel
Christian Brothers School City Park Campus
Christian Brothers School St. Anthony Campus
Christopher Homes, Inc.
Christopher Inn (Christopher Homes)
Clarion Herald Publishing Co., Inc.

Daughters of Our Lady of the Holy Rosary
De La Salle High School
Delille (Christopher Homes)
Discalced Carmelite Nuns
Hanmaum Korean Catholic Chapel
Holy Cross High School
Holy Cross Middle School
Holy Cross Primary School
Holy Family Summer Camp
Hope House
Jesuit High School
Loyola University New Orleans
Louisiana Conference of Catholic Bishops
Louisiana Pro Life Counsel
Mater Dolorosa Apartments (Christopher Homes)
Metairie Manor Dietary (Christopher Homes)
Metairie Manor I, II, III (Christopher Homes)
Mount Carmel Academy
Nazareth Inn I and II (Christopher Homes)
New Orleans Catholic Cemeteries
Notre Dame Health System (Chateau de Notre Dame)
Notre Dame Seminary and Graduate School of Theology
Our Lady of Lourdes Bingo
Our Lady of Lourdes Summer Camp
Ozanam Inn
Place Dubourg (Christopher Homes)
Project Lazarus
Roquette Lodge Dietary (Christopher Homes)
Rosaryville Spirit Life Center
Rouquette Lodge (Christopher Homes)
School Food and Nutrition Services of New Orleans, Inc. (Locations)
School Food and Nutrition Services of New Orleans, Inc. (Office)
Second Harvest Food Bank of Greater New Orleans and Acadiana
Southern Dominican Province
St Luke Summer Camp
St. Anthony's Gardens
St. Augustine High School
St. Benard Manor (Christopher Homes)
St. Benedict the Moor School
St. John Berchman Manor (Christopher Homes)
St. Joseph's Abbey Church
St. Joseph Seminary College
St. Katharine Drexel Preparatory School
St. Mary's Academy of the Holy Family
St. Mary's Dominican High School
St. Martin Manor (Christopher Homes)

The St. Paul's High School
St. Teresa's Villa (Christopher Homes)
St. Therese Academy
Society of St. Teresa
Society of St. Vincent de Paul
Stella Maris Apostleship of the Sea
Stuart Hall School for Boys
Tulane Catholic Center
University of Holy Cross
University of New Orleans Newman Center
Ursuline Academy
Villa St. Maurice (Christopher Homes)
Willwoods Community
Wynhoven Apartments I and II (Christopher Homes)

SCHEDULE A(4)

Lenders

Dell Financial SVC, LP
KS State Bank Hancock
Whitney Bank

SCHEDULE A(5)

Litigation Parties

[Redacted] C/O Sherman-Denenea, L.L.C.
ABC Insurance Company (foreign insurance company)
Amanda Gibson
American Mutual Insurance Company
Andrew Cupit
Archbishop Gregory M. Aymond
Asbestos Corporation, Ltd.
AT&T Corporation
B.L.
[REDACTED] C/O Sherman-Denenea, L.L.C.
Bethany Echelard, Kyle Echelard, & [REDACTED]
Bishop Douglas Deshotel, DD
Burmester Land & Development Company, LLC
C.L.
Catholic Charities Archdiocese of New Orleans
Centennial Insurance Company
Christopher Edward Brown, Jr., Christopher Edward Brown, Sr., & Lisa Brown
Claims Resolution Management Corporation
CSR, Ltd.
Deacon George Brignac
[REDACTED] C/O Sherman-Denenea, L.L.C.
[REDACTED] C/O Lamothe Law Firm, LLC
Eagle, Inc.
Employee(s) of Pope John Paul II High School
[REDACTED] C/O Sherman-Denenea, L.L.C.
Eric Reynolds
Ernest Riley
Excess Insurance Company
[REDACTED] C/O Sherman-Denenea, L.L.C.
Father Henry Brian Highfill
Father James Hurley f/k/a Brother James Hurley
Father Kenneth Hamilton
Father Lawrence A. Hecker
Father Michael Fraser
Father Paul Calamari
Frank Monica
Gayle M. Bartholomew
[REDACTED] C/O Sherman-Denenea, L.L.C.
Guard-Line, Inc.
Harold Thomas Ehlinger
Holy Cross College, Inc. d/b/a Holy Cross School
Holy Guardian Angels Church
Insurance Company of North America

Kyle Bourgeois & [REDACTED]
Lombard Insurance Company
Louisiana Restaurant Association Self Insurer's Fund
[REDACTED] C/O Sherman-Denenea, L.L.C.
[REDACTED] C/O Sherman-Denenea, L.L.C.
Jane Doe (identity unknown)
[REDACTED] C/O Father John Brown, S.J.
[REDACTED] C/O Elizabeth B. Carpenter Law Firm
[REDACTED] C/O Law Offices of Andre P. LaPlace
[REDACTED] C/O Law Offices of Andre P. LaPlace
[REDACTED] C/O Law Offices of Andre P. LaPlace
[REDACTED] C/O Law Offices of Andre P. LaPlace
[REDACTED] C/O Law Offices of Andre P. LaPlace
John Doe II (foreign insurance corporation)
John Doe III (foreign insurance corporation)
[REDACTED] C/O Sherman-Denenea, L.L.C.
[REDACTED] C/O Sherman-Denenea, L.L.C.
[REDACTED] C/O Sherman-Denenea, L.L.C.
Joseph Hebert
Joseph Messina, Jr., Gail Sonnier Messina, Jason Carl Messina, & Ryan Scott Messina
Kaitlyn Aubrey Luminais
[REDACTED] C/O Sherman-Denenea, L.L.C.
Lakeisha Nady
Linda Lee Stonebreaker
Melissa B. Adams
Melissa Blunt
[REDACTED] C/O Sherman-Denenea, L.L.C.
Mikkal Peterson
Neal Alan Pollet
[REDACTED] C/O Ardoin, McKowen & Ory, LLC
[REDACTED] C/O Sherman-Denenea, L.L.C.
Our Lady of Divine Providence Roman Catholic Church, Metairie, Louisiana
Our Lady of Prompt Succor Roman Catholic Church, Westwego, Louisiana
[REDACTED] C/O Gainsburgh, Benjamin, David, Meunier & Warshauer, L.L.C.
[REDACTED] C/O Lamothe Law Firm, LLC
Philmat, Inc.
Pope John Paul II High School
[REDACTED] C/O Lamothe Law Firm, LLC
[REDACTED] C/O Sherman-Denenea, L.L.C.
[REDACTED] C/O Sherman-Denenea, L.L.C.
[REDACTED] C/O Sherman-Denenea, L.L.C.
[REDACTED] C/O Lamothe Law Firm, LLC
Salesians of Don Bosco, Eastern Province in the USA d/b/a Salesian Society, Inc.
School Sisters of Notre Dame, Central Pacific Province f/k/a School Sisters of Notre Dame,
Dallas
Province

[REDACTED] c/o The Hayes Law Firm, PLC
Shaye R. Lirette
Spencer Butler
St. Bernard Parish Recreation Department
St. Charles Catholic High School
St. Joseph the Worker Roman Catholic Church, Marrero, Louisiana
St. Mary's Academy of the Holy Family
St. Paul Fire & Marine Insurance Company
[REDACTED] c/o Lamothe Law Firm, LLC
Taylor-Seidenbach, Inc.
The Archdiocese of New Orleans Indemnity, Inc.
The Catholic Mutual Relief Society of America
The Congregation of the Holy Spirit, Province of the United States
The Holy See (Vatican City State)
The McCarty Corporation
The Roman Catholic Church of the Archdiocese of New Orleans
The Society of the Divine World, Southern Province of St. Augustine
The Society of the Roman Catholic Church of the Diocese of Lafayette
[REDACTED]C/O Sherman-Denenea, L.L.C.
[REDACTED]C/O Sherman-Denenea, L.L.C.
Union Carbide Corporation
USA Central and Southern Province, Society of Jesus
Vincent Caminita, Jr., Misty Caminita, & [REDACTED]
Warren Deemer & Mary Deemer
Westchester Fire Insurance Company
Zurich Insurance Company
John H. Denenea, Esq.
Frank J. Damico Jr.
Herman, Herman, and Katz, LLC
SOREN E GISLESON
JOSEPH E CAIN
RYAN P MONSOUR
RICHARD C TRAHANT
DAMON J BALDONE AND ASSOCIATES
DAMON J BALDONE
STEPHEN M HUBER ESQ.
ROGER A STETTER ESQ.
ROBERT C JENKINS ESQ.
FRANK E LAMOTHE III ESQ.
ELIZABETH B CARPENTER ESQ.
FELECIA Y PEAVY, ESQ.
BENJAMIN T SANDERS
MATTHEW R FRANSEN
COLVIN LAW FIRM
KRISTI S. SCHUBERT
THE HAYES LAW FIRM PLC

DASHAWN HAYES
GAINSBURGH BENJAMIN DAVID MEUNIER AND WARSHAUER LLC
KETTERER BROWNE AND ANDERSON
DEREK T BRASLOW
ARDOIN McKOWEN AND ORY LLC
DAVID W ARDOIN ESQ.
RYAN P MONSOUR
PHILLIPS AND COHEN LLP
PETER W. CHATFIELD
AMY L. EASTON
LUKE J. DIAMOND
JEFFREY W. DICKSTEIN

SCHEDULE A(6)

Governmental - Regulatory

Environmental Protection Agency
Internal Revenue Service
Louisiana Department of Revenue
Louisiana Department of Environmental Quality
Louisiana Department of Insurance
Louisiana Department of Motor Vehicles
The Louisiana Public Facilities Authority, a public trust and public corporation of the State of Louisiana
Louisiana Workforce Commission (Office of Workers Compensation)
Occupational Safety and Health Administration (OSHA Region 4)
U.S. Department of Labor
Vermont Department of Financial Regulation (Deputy Commissioner - Captive Insurance)

SCHEDULE A(7)

Top 20 Creditors

1. Hancock Whitney Bank
2. Optumrx for Rx Claims
3. Ochsner Health System
4. [REDACTED]
5. Advanced Reconstructive Care
6. Meitler Consultants, Inc.
7. Gallagher Benefit Services, Inc.
8. Amerigroup LA
9. LUBA Casualty Insurance Co.
10. Louisiana Children's Medical Center
11. White Oak Consulting
12. Badia Moro Hewett Architects LLC
13. Corass Electrical Service
14. Entergy
15. Hahn Enterprises, Inc.
16. Atmos Energy Louisiana
17. Wright National Flood Insurance Co.
18. DKI Office Furniture & Supplies
19. BSN Sports
20. [REDACTED]

SCHEDULE A(8)

Insurers

AIG Insurance Company
The Archdiocese of New Orleans Indemnity, Inc.
Bedivere Insurance Company
Berkley Crime
Catholic Mutual Relief Society of America
Church Mutual Insurance Company
Founders Insurance Co.
Ironshore Insurance Company
Hiscox, Inc. Insurance Company
Liberty Mutual Insurance Co.
NAS Insurance
Nationwide Mutual Insurance Company
Safety National
Travelers Insurance
United Health BP

SCHEDULE A(9)

Professionals that Provide Services to the Debtor

Arthur J. Gallagher Risk Management Services, Inc.
Jones Walker LLP
UMR, Inc.

Investment Managers:

ABS Offshore
Harding Loevner International Equity
Harvest MLP Income Fund
Lazard International Equity
Reinhart Partners
Rhumblin Large Cap Index
Rhumblin Mid Cap Index
Rice Hall James Small/Mid Growth
Rimrock High Income Plus
Siguler Guff Distressed REOF II
Siguler Guff DOF III
Siguler Guff DOF IV
Tortoise
Vaughan Nelson Small Cap Value
VIA Energy III
Voya Global Real Estate Fund
WCM Focused Growth International Equity

SCHEDULE A(10)

Major Utility Providers

Allfax
AT&T
ATMOS ENTERGY
CABLE ONE
CENTURYLINK
CHARTER COMMUNICATIONS
City of Covington
City of Slidell
CLECO POWER LLC
Coastal Environment
COMPUCAST
COX BUSINESS
COX COMMUNICATIONS
EATEL
ELECTRICAL SALES CORP
Excel LD
HUNT TELECOMMUNICATIONS LLC
JEFFERSON PARISH DEPT. OF WATER
MAHATEL, LLC
NelNet Business Solutions
NEWWAVE COMMUNICATIONS
Nextel - Sprint
NOLA BROADBAND INC.
NTS COMMUNICATIONS
Protection One / ADT
Reserve Telecommunications
River Parish Disposal
SEWERAGE & WATER BOARD OF N.O.
SOUTHERN NETWORKING SERVICES LLC
SPARKLIGHT
SPECTRUM BUSINESS
ST. JOHN THE BAPTIST PARISH UTILITIES
SWYFT CONNECT
TAMMANY UTILITIES
UTILITIES INC. OF LOUISIANA
Verizon Wireless
VI COMMUNICATIONS INC.
WASHINGTON-ST. TAMMANY ELECTRIC COOPERATIVE, INC.
WASTE CONNECTIONS BAYOU INC.
WASTE MANAGEMENT
WINDSTREAM

SCHEDULE A(11)

Bondholders — Trustee of Bondholders

TMI Trust Company
Kevin M. Dobra

SCHEDULE A(12)

Contract Parties

First Bank & Trust
Academy Real Estate, LLC
Ads Systems LLC
Adt Commercial
Alarm Detection & Suppression Systems Contractors, LLC
American Office Supplies
Arch Of New Orleans
Blue Cross And Blue Shield Of Louisiana
Bourgeois Bennett
Bradford & Marzec LLC
Capitelli S Wicker
Captrust
CF Biggs Co. Inc.
Champagne Elevator
Chemsearch, Inc.
Christmount
Cintas
Circle Lake Retreat Center
Conduent Image Solutions
Corvus Janitorial Supplies
Crescent Payroll Solutions, Inc.
Dirty Laundry
Discovery Benefits, Inc.
Eagle Hurst Ranch
Elevator Technical Services, Inc.
Gallagher Benefit Services, Inc.
Gallo Mechanical Services, LLC
Guillory Sheet Metal Works
Hancock Bank Of Louisiana, New Orleans
Harvest Fund Advisors LLC
Hunt Telecom, LLC
Insight Knowledge Management Systems
Iron Mountain Information Management Inc.
Johnson Controls Fire Protection LP
Johnson Lambert LLP
Kane (USA), Inc.
Kar
Kleinpeter, Gary
Kone
Konica Minolta Premier Finance
Kushner & Lagraize LLC
Lmpacted Enrollment Consulting LLC
Magnolia Plantation

Marywood Retreat & Conference Center
Mercier Realty & Investment Company
Milliman
Nacome Camp & Retreat Center
New Orleans Pest Management
Orkin Pest Control
Parishsoft LLC
Pinnacle Elevator, LLC
Point Au Fer Island, L.L.C.
Point Au Fer, LLC
Pratt Landry Associates, Inc.
Primmer Piper Eggleston & Cramer PC
Public Storage
Ray Bros., Inc.
Ready Power
Red Hawk Fire & Security
Republic Services, Inc.
River Parish Disposal
Royal Crown Coffee
Rumbelow Consulting
Sci La
Selection.Com
Simplex Grinnell
Soto Camp
Southwest Engineers
St. Joseph's Abbey
St. Tammany Parish Government
State Street Global Advisors Trust Company
Sysco
Terminix Service Co Inc.
The Guardian Life Insurance Company of America
The Security Center
Tyco Simplex Grinnell
UMR Inc.
United Healthcare Insurance Co.
UnitedHealthcare BP
Uniti Fiber, LLC
Uniti Voip
Vaugh Nelson Investment Management LC
Venture Investment Associates
Voya Institutional Plan Services, LLC
Wcm Investment Management
White's Clock & Carillon

SCHEDULE A(13)

U.S. Trustee and Judges for the Eastern District of Louisiana

Hon. Meredith S. Grabill

Hon. Jerry A. Brown

David W. Asbach

EXHIBIT 2

TO BE SUBMITTED

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF LOUISIANA

IN RE:	§	Case No. 20-10846
	§	
THE ROMAN CATHOLIC CHURCH	§	
OF THE ARCHDIOCESE OF NEW	§	
ORLEANS	§	Section “A”
	§	
Debtor.⁵	§	
		Chapter 11

**ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION
OF PACHULSKI STANG ZIEHL & JONES LLP AS CO- COUNSEL FOR THE
OFFICIAL COMMITTEE OF UNSECURED CREDITORS**

The Court held a hearing on July 16, 2020, on the Application of the Official Committee of Unsecured Creditors (the “Committee”) to Employ Pachulski Stang Ziehl & Jones LLP (“PSZJ”) as Co-Counsel for the Committee [Docket # ___] (the “Application”), together with the Declaration of James Stang in the above-captioned matter. Considering the Application, the record, the law applicable thereto, and given that there was no objection filed thereto, the Court orders as follows:

IT IS ORDERED that, pursuant to 11 U.S.C. §§ 328(a) and 1103 of the Bankruptcy Code, the Committee is authorized to employ PSZJ as its co-counsel in this chapter 11 case, effective as of May 22, 2020, on a final basis.

IT IS FURTHER ORDERED that the Court specifically reserves its right to review the reasonableness of fees, including hourly rate and time involved.

⁵ The last four digits of the Debtor’s federal tax identification number are 8966. The Debtor’s principal place of business is located at 7887 Walmsley Ave., New Orleans, LA 70125.

IT IS FURTHER ORDERED that PSZJ shall apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with this chapter 11 case in compliance with sections 330 and 331 of the Bankruptcy Code of the Bankruptcy Code and the applicable provisions of the Bankruptcy Rules, the Local Rules, the Complex Case Procedures and any other applicable procedures and orders of the Court. PSZJ shall also make a reasonable effort to comply with the requests for information and additional disclosures as set forth in the U.S. Trustee Guidelines, both in connection with the Application and all applications for compensation and reimbursement of expenses filed by PSZJ in this chapter 11 case.

IT IS FURTHER ORDERED that PSZJ shall serve this Order on the required parties pursuant to this Court's Order Limiting Notice, and file a certificate of service to that effect within three (3) days.

New Orleans, Louisiana this ____ day of June, 2020

MEREDITH S. GRABILL
UNITED STATES BANKRUPTCY JUDGE