

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11
 :
THE CHRISTIAN BROTHERS' INSTITUTE, *et al.* : Case No.: 11-22820 (RDD)
 :
Debtors. : (Jointly Administered)
----- X

**ORDER APPROVING DEBTORS' MOTION FOR ORDER
ESTABLISHING DEADLINES FOR FILING PROOFS OF CLAIM
AND APPROVING FORM AND MANNER OF NOTICE THEREOF**

Upon the motion (the "Motion") of The Christian Brothers' Institute and The Christian Brothers of Ireland, Inc., as debtors and debtors-in-possession (the "Debtors"), for an Order Establishing Deadlines for Filing Proofs of Claim and Form and Manner of Notice Thereof (Docket No. 170);¹ and it appearing that the Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and it appearing that this proceeding is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and it appearing that venue of this case and the Motion in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and notice of the Motion being appropriate under the particular circumstances and no other or further notice being required except as provided herein; and upon the response of the Committee dated January 17, 2012 (Docket No. 215); and upon the objection of certain high schools (the "High Schools") dated January 19, 2012 (Docket No. 225); and upon the limited objection of Pacific Indemnity Company dated January 13, 2012 (Docket No. 209); and upon the Debtors' reply to the Committee's response dated January 19, 2012 (Docket No. 221); and upon the record established at the hearing held on January 23, 2012; and the Court having reviewed the letters, both dated February 7, 2012, of Peterm M. Friedman, Esq., for the High Schools and James I. Stang, for the Committee; and it appearing that the relief requested in the Motion and granted herein is in the best interest of the

¹ Capitalized terms not defined herein shall have the same meaning ascribed to them in the Motion.

Debtors' estates, their creditors and other parties-in-interest and necessary and appropriate for establishing an effective bar date for the submission of the types of claims provided for herein; and after due deliberation and sufficient cause appearing therefor; it is hereby

ORDERED, ADJUDGED AND DECREED that:

1. The Motion is granted as set forth herein.

2. The General Creditor Proof of Claim Form, the Sexual Abuse Proof of Claim Form, the General Creditor Bar Date Notice, the Sexual Abuse Bar Date Notice, and the Publication Notice, in the forms annexed hereto as **Exhibits "A," "B," "C," "D,"** and **"E,"** respectively, and the manner of providing notice of the Bar Dates proposed in the Motion, and as modified by this Order, are approved in all respects pursuant to Bankruptcy Rules 2002(a)(7) and 2002(l). The form and manner of notice of the Bar Dates approved herein are deemed to fulfill the notice requirements of the Bankruptcy Rules and the Local Rules for the Court, and notice of the Bar Dates in the form and manner as proposed by the Debtors herein is fair and reasonable and will provide good, sufficient, and due notice to all creditors of their rights and obligations in connection with claims they may assert against the Debtors' estates in these Chapter 11 cases. Accordingly, the Debtors are authorized and directed to serve and/or publish the notice of the Bar Date as set forth below.

3. Except as provided in paragraph 6 of this Order, any entity holding a pre-petition claim against the Debtors must file a proof of claim in accordance with the procedures described herein **on or before May 11, 2012, 4:00 p.m. (prevailing Eastern Time)** (the "General Bar Date"). The General Bar Date shall be identified in the General Bar Date Notice. Except as provided in paragraph 6 of this Order, the General Bar Date applies to all persons and entities (including government entities), other than Sexual Abuse Victims, that assert claims, as

defined in § 101(5) of the Bankruptcy Code, against the Debtors (whether secured, unsecured priority or unsecured non-priority) that arose prior to or on the Petition Date.

4. Except as provided in paragraph 6 of this Order, any entity holding a pre-petition claim arising from sexual abuse for which the individual believes that the Debtors may be liable, must file a proof of claim in accordance with the procedures described herein on or before **August 1, 2012, 4:00 p.m. (prevailing Eastern Time)** (the “Sexual Abuse Bar Date”). The Sexual Abuse Bar Date shall be identified in the Sexual Abuse Bar Date Notice and the Publication Notice.

5. For the purposes of determining the timeliness of the filing of a proof of claim and for determining whether a creditor should use the General Creditor Proof of Claim Form or the Sexual Abuse Proof of Claim Form, sexual abuse is defined as any and all acts or omissions that the Debtors may be legally responsible for that in any way arise out of, are based upon, or involve sexual conduct or misconduct, sexual abuse or molestation, indecent assault, indecent battery, rape, lascivious behavior, pedophilia, ephobophilia, or sexually related 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. It is possible that under applicable law, a person may be sexually abused whether or not this activity involves explicit force, whether or not this activity involves genital or other physical contact and whether or not there is physical, psychological or emotional harm to the person.

6. The following entities, whose claims otherwise would be subject to the Bar Dates, shall **not** be required to file proofs of claim in these Chapter 11 cases:

- (a) Any person or entity that has already properly filed a proof of claim against the Debtors with the Clerk of the Court for the United States Bankruptcy Court for the Southern District of New York (the “Court”), or with the Debtors’ Claims Agent – Omni

Management Group (“Omni” or the “Claims Agent”). Notwithstanding the foregoing, **Sexual Abuse Victims that previously filed with the Court a proof of claim must utilize the Sexual Abuse Proof of Claim Form and must refile the claim if that form was not used;**

- (b) Any person or entity: (a) whose claim is listed in the Schedules or any amendments thereto; and (b) whose claim is not described therein as “disputed,” “contingent,” or “unliquidated;” and (c) who does not dispute the amount or classification of its claim as set forth in the Schedules;
- (c) Any person or entity that asserts an administrative expense claim against the Debtors pursuant to § 503(b) and § 507(a)(2) of the Bankruptcy Code;
- (d) Any person or entity whose claim against the Debtors has been allowed by an order of the Court entered on or before the applicable Bar Date; and
- (e) Any person or entity whose claim has been paid in full. For the avoidance of doubt, this does not include Sexual Abuse Victims who were paid pursuant to settlement agreements but believe they have additional claims against the Debtors beyond what was agreed to in the settlement.

7. Any person or entity that holds a claim that arises from the rejection of an executory contract or unexpired lease, as to which the order authorizing such rejection is dated on or before the date of entry of this Order, must file a proof of claim based on such rejection on or before the General Bar Date, and any person or entity that holds a claim that arises from the rejection of an executory contract or unexpired lease, as to which an order authorizing such rejection is dated after the date of entry of this Order, must file a proof of claim on or before such date as the Court may fix in the applicable order authorizing such rejection.

8. The Debtors, and any party-in-interest, shall retain the right to: (i) dispute, on any ground, including statute of limitations, or assert offsets or defenses against, any filed claim or any claim listed or reflected in the Schedules as to nature, amount, liability,

classification or otherwise; and (ii) subsequently designate any claim as disputed, contingent or unliquidated.

9. Subject to the provisions of paragraph 6 of this Order, the following entities **must** file a proof of claim on or before the applicable Bar Date:

- (a) Any person or entity whose pre-petition claim against the Debtors is not listed in the Debtors' Schedules or whose pre-petition claim is listed in the Schedules but is listed as disputed, contingent or unliquidated and that desires to participate in these cases or share in any distribution in these cases;
- (b) Any person or entity that believes that its pre-petition claim is improperly classified in the Schedules or is listed in an incorrect amount and that desires to have its claim allowed in a classification or amount other than that identified in the Schedules; and
- (c) Any Sexual Abuse Victim who believes that he or she has a claim against the Debtors, including but not limited to, Sexual Abuse Victims who have previously filed lawsuits against the Debtors, and Sexual Abuse Victims who have never filed a lawsuit, entered into a settlement or reported their abuse.

10. **Pursuant to Bankruptcy Rule 3003(c)(2), any entity that is required to file a proof of claim in these Chapter 11 cases pursuant to the Bankruptcy Code, the Bankruptcy Rules, or this Order with respect to a particular claim against the Debtors, but that fails to do so by the applicable Bar Date, shall NOT be treated as a creditor with respect to such claim for the purposes of voting on and distribution under any Chapter 11 plan proposed and/or confirmed in these cases.**

11. If the Debtors amend or supplement their Schedules subsequent to the date hereof, the Debtors shall give notice of such amendment or supplement to the holders of claims affected thereby, and such holders shall be afforded thirty (30) days from the date of such notice to file proofs of claim in respect of their claims or be barred from doing so, and shall be given notice of such deadline.

12. Each General Creditor Proof of Claim Form filed must: (a) be written in English; (b) be denominated in lawful currency of the United States as of the Petition Date; and (c) have attached copies of any writings upon which the claim is based in accordance with Bankruptcy Rules 3001(c) and 3001(d), including for secured claims, evidence that the alleged security interest has been perfected; and (d) be originally executed and mailed or delivered to Omni Management Group at the following address: Christian Brothers Institute, c/o Omni Management Group, LLC, 16161 Ventura Boulevard, Suite C, PMB608, Encino, California 91436 so as to be received by Omni on the General Bar Date (**proofs of claim sent by facsimile, telecopy, or e-mail will not be accepted**).

13. Sexual Abuse Proof of Claims Forms shall be submitted pursuant to the following Confidentiality Protocol:

- (a) Sexual Abuse Victims are directed **NOT** to file a Sexual Abuse Proof of Claim Form with the Court. Instead, the original and two (2) copies of each Sexual Abuse Proof of Claim Form must be mailed or delivered to Omni at the following address: Christian Brothers Institute, c/o Omni Management Group, LLC, 16161 Ventura Boulevard, Suite C, PMB608, Encino, California 91436.
- (b) Sexual Abuse Proof of Claim Forms submitted by Sexual Abuse Victims will not be available to the general public unless a Sexual Abuse Victim affirmatively indicates his or her desire that the proof of claim be made public in Part 1 of the Sexual Abuse Proof of Claim Form. The Confidentiality Protocol is for the benefit of the Sexual Abuse Victims. Accordingly, Sexual Abuse Victims may elect to make any of the information contained in a Sexual Abuse Proof of Claim Form public, even if they elected to file the Proof of Claim confidentially.
- (c) Sexual Abuse Proof of Claim Forms submitted by a Sexual Abuse Victim shall be held and treated as confidential by the Debtors and Debtors' counsel, and upon request to the parties listed below (the "Permitted Parties"), subject to each Permitted Party executing and returning to Debtors' counsel a confidentiality agreement (the "Confidentiality Agreement"), and to such other persons as the Court determines, provided, however, that all parties with access to

the Sexual Abuse Proof of Claim Forms shall agree to keep the information provided in a Sexual Abuse Proof of Claim Form confidential (unless the Sexual Abuse Victim elects otherwise in Part 1 of the Sexual Abuse Proof of Claim Form).

- (d) The Permitted Parties include:
- (i) Counsel for the Official Committee of Unsecured Creditors. For the avoidance of doubt, Committee members and their personal counsel shall be Permitted Parties; provided, however, that these parties shall have access to the Sexual Abuse Proof of Claim Forms submitted by a Sexual Abuse Victim (after the Sexual Abuse Proof of Claim Form has been redacted to remove the information identified in Parts 2(A) and 2(B) of the Sexual Abuse Proof of Claim Form); and provided further that (a) Committee counsel shall provide five days' notice in writing (including via email) to counsel to the High Schools of Committee counsel's intent to provide a copy of any Sexual Abuse Proof of Claim that identifies one or more of the High Schools to Committee members or their personal counsel, (b) the High Schools may seek entry of an order compelling the Committee counsel to redact any High School identified on a Sexual Abuse Proof of Claim (any such motion, a "Protective Motion"), and (c) Committee counsel shall not provide a copy of any such Sexual Abuse Proof of Claim Form(s) to Committee members or their counsel (unless the identity of the High School is redacted) until such time as the Court enters an order adjudicating any Protective Motion; provided, further, that, subject to further order of the Court, the Committee members and their personal counsel shall be permitted to use information acquired through access to the Sexual Abuse Proof of Claim Forms submitted by Sexual Abuse Victims only for the purpose of fulfilling their fiduciary duties as members of the Committee;
 - (ii) Insurance companies that provided insurance that may cover the claims described in the Sexual Abuse Proof of Claim Forms. For the avoidance of doubt, the Confidentiality Agreement executed by the insurance companies (or any other entity) will cover all employees and agents reasonably necessary to have access to the Sexual Abuse Proof of Claim Forms in order to properly analyze and determine whether to settle and/or defend such Sexual Abuse claims;

- (iii) Any future claims representative appointed under a plan of reorganization;
- (iv) Any special arbitrator/claims reviewer appointed to review and resolve the claims of Sexual Abuse Victims;
- (v) Any settlement trustee appointed to administer payments to Sexual Abuse Victims;
- (vi) Authorized representatives of a department of corrections if the Sexual Abuse Victim is incarcerated but only to the extent disclosure is authorized under applicable non-bankruptcy law;
- (vii) Unless otherwise ordered by the Court, members of the Committee and their personal counsel (after the Sexual Abuse Proof of Claim Form has been redacted to remove the Sexual Abuse Victim's name, address and any other information identified in Part 2(A) of the Sexual Abuse Proof of Claim Form); and
- (viii) Such other persons as the Court determines should have the information in order to evaluate Sexual Abuse Claims.²

14. Each Sexual Abuse Proof of Claim Form submitted must: (i) be written in English; (ii) be denominated in lawful currency as of the Petition Date; and (iii) be originally executed and received by Omni at the following address: Christian Brothers Institute, c/o Omni Management Group, LLC, 16161 Ventura Boulevard, Suite C, PMB608, Encino, California 91436 on or before the Sexual Abuse Bar Date (**proofs of claim sent by facsimile, telecopy, or e-mail will not be accepted**).

15. At least sixty (60) days prior to the General Bar Date, the Debtors shall serve by United States mail, first-class postage prepaid, the General Creditor Bar Date Notice Package, upon: (a) the Office of the United States Trustee for the Southern District of New York; (b) counsel to the Official Committee of Unsecured Creditors; (c) all entities who have filed a

² The United States Trustee's Office shall have full access without being required to execute a Confidentiality Agreement.

notice of appearance in the Debtors' cases; (d) all entities listed in the Debtors' Schedules; (e) all parties to executory contracts and unexpired leases of the Debtors; (f) all entities that have previously filed proofs of claim in the Debtors' cases; (g) any other entities or their counsel, including governmental units, known to the Debtors as entities who may have claims against the estates; and (h) such additional persons and entities as deemed appropriate by the Debtors.

16. The Debtors shall provide notice of the Sexual Abuse Bar Date by serving, via United States mail, first-class postage prepaid, at least one hundred fifty (150) days prior to the Sexual Abuse Bar Date, the Sexual Abuse Bar Date Notice Package on known Sexual Abuse Victims who:

- (a) Filed, or threatened to file, lawsuits against the Debtors that allege they were abused;
- (b) contacted the Debtors to report that they were victims of abuse, whether or not that individual's claim was considered to be substantiated and whether or not the report was written or verbal;
- (c) entered into a settlement agreement with the Debtors stemming from allegations of abuse; and
- (d) received payment from the Debtors as a result of an allegation of abuse.

17. At least one hundred fifty (150) days prior to the Sexual Abuse Bar Date, to the extent the Debtors are able to obtain alumni directories, the Debtors will also serve a one page notice in the form annexed hereto as **Exhibit "E,"** on all known alumni of schools, or other institutions in which the Debtors are aware that alleged and/or credibly accused abusers taught or performed ministry, at the addresses set forth in the alumni directories.

18. The Debtors shall provide notice of the Sexual Abuse Bar Date by causing a copy of the publication notice in the form annexed hereto as **Exhibit "E,"** to be published as follows in national publications as well as community/local publications for areas in proximity of

the schools or institutions where the Debtors' Brothers have taught, performed ministry, or were otherwise affiliated with.

Publication twice (in English) in each of the following publications; the first publication to occur within two (2) weeks of the service of the Sexual Abuse Bar Date Notice Package (as required by paragraph 16 of this Order) and the second publication to occur forty-five (45) days prior to the expiration of the Sexual Abuse Bar Date:

National Publications:

New York Times – Nat'l Ed.
USA Today – Nat'l Ed.

Local U.S. Publications:

Albany Times Union
Arizona Republic
Asbury Park Press
Bergen Record
Bonita Daily News
Boston Globe
Californian
Chandler Times
Chicago Sun-Times
Contra Costa Times
Hudson Valley Times
Kent Reporter
Los Angeles Times
Madison County Journal
Miami Herald
Montebello Comet
Mountain Eagle
Naples Record
New York Times – NY Metro Ed
Newark Star Ledger
Oakland Press
Ocala Star Banner
Poughkeepsie Journal
Rochester Democrat & Chronicle
San Antonio Express News
Seabee Banner
Star Advertiser
Tampa Tribune
The Bugle

The Herald-News
The Jena Times
The Montana Standard
The Post and Courier
Times Picayune
Vallejo Times Herald
Warwick Beacon

Canadian Publications:

Advertiser
Burnaby / New Westminister NewsLeader
Chronicle
Journal de Montreal
Journal de Quebec
Kamloops This Week
St. John's Telegram
The Charter
The Citizen
The Compass
The Daily News
The National Post
The Western Star
Times Colonist
Toronto Star
Vancouver Province
Welland Tribune

19. The Debtors shall provide further notice of the Sexual Abuse Bar Date by taking the following measures:

- (a) Upon entry of this Order, the Debtors shall post component parts of the Sexual Abuse Bar Date Notice Package on the following website:

www.omnimgt.com/TheChristianBrothers

- (b) The Debtors and the Committee shall maintain a toll free number which may be used by Sexual Abuse to ask questions or obtain copies of the Sexual Abuse Bar Date Notice Package or parts thereof;
- (c) Within one (1) week of the service of the Sexual Abuse Bar Date Notice Package (as required by paragraph 16 of this Order), the Debtors shall mail a copy of the Sexual Abuse Bar Date Notice to the following: (i) the attorney general for each U.S. state where a school is located, and the Canadian counterpart to an attorney general; (ii) the district attorney for each U.S. county where a school is located and the Crown Prosecutor for each Canadian province where a school is located; (iii) the public health agency for each locality where a school is located; (iv) a substance abuse agency in each locality where a school is located; (v) the police department for each locality where a school is located; (vi) the

hospital for each locality where a school is located; and (vii) the Catholic diocese which governs the area where a school is located – and request that each party post such Notice until the expiration of the Sexual Abuse Bar Date;

20. Each request described above shall be on the Debtors' stationery, personally signed by a Christian Brother who is an officer of the Debtors and be in a format approved by the Committee or the Court. The request shall include a statement at the bottom for the recipient to indicate whether it will comply with the request and the request shall include a stamped self-addressed return envelope.

21. For any proof of claim to be validly and properly filed, a signed original together with any accompanying documentation required by Bankruptcy Rules 3001(c) and 3001(d), must be mailed or delivered to Omni at the address identified on the applicable Bar Date Notice so as to be received **no later than 4:00 p.m. (prevailing Eastern Time)** on the applicable Bar Date. Proofs of claim may be submitted in person or by courier service, hand delivery or U.S. mail. Proofs of claim submitted by facsimile or e-mail shall not be accepted. Proofs of claim shall be deemed filed when actually received by Omni by the applicable Bar Date. If a creditor wishes to receive acknowledgement of Omni's receipt of a proof of claim, the creditor also must submit to Omni by the applicable Bar Date and concurrently with submitting its original proof of claim: (i) a copy of the original proof of claim; and (ii) a self-addressed, stamped return envelope.

22. Any person or entity who desires to rely on the Schedules will have the responsibility for determining that the claim is accurately listed in the Schedules.

23. The Debtors are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

24. Entry of this Order is without prejudice to the right of the Debtors to seek a further order of this Court fixing a date by which holders of claims not subject to the applicable Bar Dates established herein must file proofs of claim or be barred from doing so.

25. Nothing contained herein shall constitute a waiver by the Debtors or any party in interest of (a) any defenses in connection with any claims that are asserted against them; or (b) the right to assert that any claims are barred by applicable statutes of limitations.

26. Nothing contained in the definition of sexual abuse in this Order, or in any Exhibit attached to this Order, creates or confers a right of recovery that does not otherwise exist under applicable non-bankruptcy law, nor does it impair any defense or denial otherwise available under applicable non-bankruptcy law.

27. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation and/or enforcement of this Order.

Dated: White Plains, New York
February 10, 2012

/s/Robert D. Drain
HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT A

B 10 (Official Form 10) (12/08)

| | | |
|---|--|--|
| UNITED STATES BANKRUPTCY COURT Southern District of New York | | PROOF OF CLAIM |
| Name of Debtor: The Christian Brothers' Institute / The Christian Brothers of Ireland, Inc. | | Case Number: 11-22820 (RDD) |
| NOTE: <i>This form should not be used to make a claim for an administrative expense arising after the commencement of the case. A request for payment of an administrative expense may be filed pursuant to 11 U.S.C. § 503.</i> | | |
| Name of Creditor (the person or other entity to whom the debtor owes money or property): Name and address where notices should be sent: Telephone number: | | <input type="checkbox"/> Check this box to indicate that this claim amends a previously filed claim. Court Claim Number: _____ <i>(If known)</i> Filed on: _____ |
| Name and address where payment should be sent (if different from above): Telephone number: | | |
| 1. Amount of Claim as of Date Case Filed: \$ _____ If all or part of your claim is secured, complete item 4 below; however, if all of your claim is unsecured, do not complete item 4. If all or part of your claim is entitled to priority, complete item 5. <input type="checkbox"/> Check this box if claim includes interest or other charges in addition to the principal amount of claim. Attach itemized statement of interest or charges. | | 5. Amount of Claim Entitled to Priority under 11 U.S.C. §507(a). If any portion of your claim falls in one of the following categories, check the box and state the amount. Specify the priority of the claim. <input type="checkbox"/> Domestic support obligations under 11 U.S.C. §507(a)(1)(A) or (a)(1)(B). <input type="checkbox"/> Wages, salaries, or commissions (up to \$10,950*) earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier – 11 U.S.C. §507 (a)(4). <input type="checkbox"/> Contributions to an employee benefit plan – 11 U.S.C. §507 (a)(5). <input type="checkbox"/> Up to \$2,425* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use – 11 U.S.C. §507 (a)(7). <input type="checkbox"/> Taxes or penalties owed to governmental units – 11 U.S.C. §507 (a)(8). <input type="checkbox"/> Other – Specify applicable paragraph of 11 U.S.C. §507 (a)(____). Amount entitled to priority: \$ _____ <i>*Amounts are subject to adjustment on 4/1/10 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.</i> |
| 2. Basis for Claim: _____ (See instruction #2 on reverse side.) | | |
| 3. Last four digits of any number by which creditor identifies debtor: _____ 3a. Debtor may have scheduled account as: _____ (See instruction #3a on reverse side.) | | |
| 4. Secured Claim (See instruction #4 on reverse side.) Check the appropriate box if your claim is secured by a lien on property or a right of setoff and provide the requested information. Nature of property or right of setoff: <input type="checkbox"/> Real Estate <input type="checkbox"/> Motor Vehicle <input type="checkbox"/> Other Describe: Value of Property: \$ _____ Annual Interest Rate _____ % Amount of arrearage and other charges as of time case filed included in secured claim, if any: \$ _____ Basis for perfection: _____ Amount of Secured Claim: \$ _____ Amount Unsecured: \$ _____ | | |
| 6. Credits: The amount of all payments on this claim has been credited for the purpose of making this proof of claim. 7. Documents: Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. You may also attach a summary. Attach redacted copies of documents providing evidence of perfection of a security interest. You may also attach a summary. (See instruction 7 and definition of "redacted" on reverse side.) DO NOT SEND ORIGINAL DOCUMENTS. ATTACHED DOCUMENTS MAY BE DESTROYED AFTER SCANNING. If the documents are not available, please explain: | | |
| Date: _____ | Signature: The person filing this claim must sign it. Sign and print name and title, if any, of the creditor or other person authorized to file this claim and state address and telephone number if different from the notice address above. Attach copy of power of attorney, if any. | |
| | | FOR COURT USE ONLY |

EXHIBIT B

THIS SPACE IS FOR COURT USE ONLY

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
In re: : Chapter 11
: :
THE CHRISTIAN BROTHERS' INSTITUTE, *et al.* : Case No.: 11-22820 (RDD)
: :
Debtors. : (Jointly Administered)
----- X

SEXUAL ABUSE PROOF OF CLAIM

IMPORTANT:
THIS FORM MUST BE RECEIVED NO LATER THAN
AUGUST 1, 2012 AT 4:00 P.M. (PREVAILING EASTERN TIME)

Carefully read the instructions included with this SEXUAL ABUSE PROOF OF CLAIM and complete ALL applicable questions. Please print clearly and use blue or black ink. Send the original, together with two (2) copies, to the designated claims agent, **OMNI MANAGEMENT GROUP** at the following address: Christian Brothers Institute, c/o Omni Management Group, LLC, 16161 Ventura Boulevard, Suite C, PMB608, Encino, California 91436.

THIS PROOF OF CLAIM IS FOR VICTIMS OF SEXUAL ABUSE ONLY.

For the purposes of this Proof of Claim, **sexual abuse** is defined as any and all acts or omissions that the Debtors may be legally responsible for that in any way arise out of, are based upon, or involve sexual conduct or misconduct, sexual abuse or molestation, indecent assault, indecent battery, rape, lascivious behavior, pedophilia, ephebophilia, or sexually related 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. It is possible that under applicable law, a person may be sexually abused whether or not this activity involves explicit force, whether or not this activity involves genital or other physical contact and whether or not there is physical, psychological or emotional harm to the person.

YOU MAY WISH TO CONSULT AN ATTORNEY REGARDING THIS MATTER.

TO BE VALID, THIS PROOF OF CLAIM MUST BE SIGNED BY YOU OR YOUR ATTORNEY. IF THE SEXUAL ABUSE VICTIM IS DECEASED OR INCAPACITATED, THE FORM MAY BE SIGNED BY THE SEXUAL ABUSE VICTIM'S REPRESENTATIVE OR THE ATTORNEY FOR THE ESTATE. IF THE SEXUAL ABUSE VICTIM IS A MINOR, THE FORM MAY BE SIGNED BY THE SEXUAL ABUSE VICTIM'S PARENT OR LEGAL GUARDIAN, OR THE SEXUAL ABUSE VICTIM'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.

UNLESS YOU INDICATE OTHERWISE IN PART 1 BELOW, YOUR IDENTITY WILL BE KEPT STRICTLY CONFIDENTIAL, UNDER SEAL, AND OUTSIDE THE PUBLIC RECORD. HOWEVER, INFORMATION IN THIS CLAIM WILL BE PROVIDED PURSUANT TO COURT-APPROVED GUIDELINES TO COUNSEL FOR THE COMMITTEE OF UNSECURED CREDITORS, AND TO SUCH OTHER PERSONS AS THE COURT DETERMINES NEED THE INFORMATION IN ORDER TO EVALUATE THE CLAIM.

PART 1: CONFIDENTIALITY

THIS SEXUAL ABUSE 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 do not want this Proof of Claim (along with any accompanying exhibits and attachments) to be kept confidential. Please verify this election by signing directly below.

Signature: _____

Print Name: _____

PART 2: IDENTIFYING INFORMATION

A. Sexual Abuse Victim

| First Name | Middle Initial | Last Name | Jr/Sr/III |
|--|----------------|------------------------|-----------------------------------|
| Mailing Address (If party is incapacitated, is a minor or is deceased, please provide the address of the individual submitting the claim. If you are in jail or prison, your current address). | | | |
| City | State/Prov. | Zip Code (Postal Code) | Country (if other than U.S.A.) |
| Telephone No(s): Home: _____ Work: _____ Cell: _____ | | | |
| Email address: _____ | | | |
| If you are in jail or prison, your identification number: _____ | | | |

May we leave voicemails for you regarding your claim? Yes No

May we send confidential information to your email: Yes No

Birth Date: _____ Male Female
 Month Day Year

Any other name, or names, by which the Sexual Abuse Victim has been known: _____

B. Sexual Abuse Victim's Attorney, if any. (Do not list counsel for the Debtors or the Official Creditors Committee):

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

NOTE: IF YOU HAVE PREVIOUSLY FILED A LAWSUIT AGAINST THE DEBTORS IN STATE OR FEDERAL COURT, YOU MAY ATTACH THE COMPLAINT. IF YOU DID NOT FILE A LAWSUIT, OR IF THE COMPLAINT DOES NOT CONTAIN ALL OF THE INFORMATION REQUESTED BELOW, YOU MUST PROVIDE THE INFORMATION BELOW.

a. Who committed the acts of sexual abuse or other wrongful conduct?

b. What is the position, title or relationship to you (if known) of the abuser or individual who committed these acts?

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

d. When did the sexual abuse or other wrongful conduct take place?

1. If the sexual abuse or other tortious conduct took place over a period of time (months or years), please state when it started, when it stopped, and how many times it occurred.

2. Please also state your age(s) and your grade(s) in school (if applicable) at the time the abuse or other wrongful conduct took place.

e. What happened (describe what happened):

f. Did you tell anyone about the sexual abuse or other wrongful conduct and, if so, who did you tell and when (this would include parents; relatives; friends; the Christian Brothers; attorneys; counselors; and law enforcement authorities)?

PART 4: IMPACT OF COMPLAINT

(Attach additional separate sheets if necessary)

(If you are uncertain how to respond to this Part 4, you may leave this Part 4 blank, but you will be required to complete this Part 4 within thirty (30) days after a written request is made for the information requested in this Part 4)

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

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

PART 5: ADDITIONAL INFORMATION

1. Prior 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.) _____

2. Settlements: Regardless of whether a complaint was ever filed against any party because of the sexual abuse, have you settled any claim relating to the sexual abuse described in this claim?

Yes No (If “Yes,” please describe, including parties to the settlement. You are required to attach a copy of any settlement agreement.) _____

3. Bankruptcy. Have you ever filed bankruptcy? Yes No (If "Yes," please provide the following information:

Name of Case: _____ Court: _____

Date filed: _____ Case No. _____

Chapter: 7 11 12 13 Name of Trustee: _____

Date: _____

Sign and print your name. If you are signing the claim on behalf of another person or an estate, print your title.

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

Signature: _____

Print Name: _____

Title: _____

EXHIBIT C

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
In re: : Chapter 11
: :
THE CHRISTIAN BROTHERS' INSTITUTE, *et al.* : Case No.: 11-22820 (RDD)
: :
Debtors. : (Jointly Administered)
----- X

NOTICE OF BAR DATES FOR FILING OF GENERAL PROOFS OF CLAIM

TO ALL PERSONS AND ENTITIES WITH CLAIMS AGAINST THE CHRISTIAN BROTHERS' INSTITUTE AND THE CHRISTIAN BROTHERS OF IRELAND, INC.:

PLEASE TAKE NOTICE that on April 28, 2011 (the "Petition Date") The Christian Brothers' Institute ("CBI") and The Christian Brothers of Ireland, Inc. ("CBOI") each a debtor and debtor in possession in the above-captioned cases (collectively, the "Debtors") filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Southern District of New York (the "Court"). The Debtors, their addresses, case numbers, proof of claim forms and other relevant information related to these Chapter 11 cases may be obtained at: www.omnimgt.com/TheChristianBrothers.

PLEASE TAKE FURTHER NOTICE that on February ___, 2012, the Court entered an order (the "Bar Date Order") establishing certain claims bar dates in the Debtors' Chapter 11 cases. By the Bar Date Order, the Court established **May 11, 2012 at 4:00 p.m. (prevailing Eastern Time)**, as the date by which general claims must be filed (the "General Bar Date"). Except as described below, the Bar Date Order requires all Entities, including Governmental Units, that have or assert any prepetition Claims against the Debtors to file proofs of claim with Omni Management Group, the Court-appointed claims and noticing agent in these cases (the "Claims Agent"), so that their proofs of claim are received by the Claims Agent on or before 4:00 p.m. (prevailing Eastern Time) on the applicable bar date set forth herein. Please note that the terms "Entity," "Governmental Unit" and "Claim" are defined below.

PLEASE TAKE FURTHER NOTICE that for your convenience, enclosed with this notice (the "General Creditor Bar Date Notice") is a proof of claim form (the "General Creditor Proof of Claim Form"). If this notice does not include a proof of claim form, a proof of claim form may be obtained from the Claims Agent at: www.omnimgt.com/TheChristianBrothers.

KEY DEFINITIONS

- As used in this Notice, the term “Entity” has the meaning given to it in section 101(15) of the Bankruptcy Code, and includes all persons (individuals, partnerships and corporations), estates, trusts, Governmental Units and the United States Trustee.
- As used in this Notice, the term “Governmental Unit” has the meaning given to it in section 101(27) of the Bankruptcy Code and includes the United States, States, commonwealths, districts, territories, municipalities, foreign states, or departments, agencies or instrumentalities of the foregoing.
- As used in this Notice, the term “Claim” shall mean, as to or against the Debtors and in accordance with section 101(5) of the Bankruptcy Code: (i) any right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured or unsecured; or (ii) any right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured or unsecured.

A CLAIMANT SHOULD CONSULT AN ATTORNEY IF THE CLAIMANT HAS ANY QUESTIONS, INCLUDING WHETHER SUCH CLAIMANT MUST FILE A PROOF OF CLAIM. A CLAIMANT MAY ALSO OBTAIN INFORMATION FROM THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS BY CALLING 1-888-667-4266.

I. WHO MUST FILE A PROOF OF CLAIM AND THE APPLICABLE BAR DATES

- A. **The Bar Dates:** The Bar Date Order establishes the following applicable bar dates for filing proofs of claim in these cases:
1. **The General Bar Date.** Except as set forth below, pursuant to the Bar Date Order, all Entities, including Governmental Units, holding Claims against the Debtors (whether secured, unsecured priority, or unsecured non-priority) that arose prior to or on April 28, 2011, are required to file proofs of claim by the General Bar Date – **May 11, 2012 at 4:00 p.m. (prevailing Eastern Time).**
 2. **The Rejection Bar Date.** Any Entity whose Claim arises out of the Court-approved rejection of an executory contract or unexpired lease, in accordance with section 365 of the Bankruptcy Code and pursuant to an order entered prior to the confirmation of a Chapter 11 plan(s) in the Debtors’ Chapter 11 cases, must file a proof of claim on or before the later

of: (i) the General Bar Date; (ii) 4:00 p.m. (prevailing Eastern Time) on the date that is thirty (30) days after entry of an order approving the rejection of an executory contract or unexpired lease pursuant to which the entity asserting the Rejection Damages Claim is a party. The later of these dates is referred to in this Notice as the "Rejection Bar Date."

B. **Entities that MUST File Proofs of Claims by the General Bar Date:** Subject to the terms described above for holders of Claims subject to the Rejection Bar Date and except as set forth in paragraph "C" below, the following Entities (including Governmental Units) must file proofs of claim on or before the General Bar Date:

1. Any person or entity whose pre-petition claim against the Debtors is not listed in the Debtors' Schedules or whose pre-petition claim is listed in the Schedules but is listed as disputed, contingent or unliquidated and that desires to participate in these cases or share in any distribution in these cases; and
2. Any person or entity that believes that its pre-petition claim is improperly classified in the Schedules or is listed in an incorrect amount and that desires to have its claim allowed in a classification or amount other than that identified in the Schedules.

PLEASE NOTE THAT INDIVIDUALS ASSERTING CLAIMS ARISING FROM SEXUAL ABUSE FOR WHICH SUCH INDIVIDUALS BELIEVE THE CHRISTIAN BROTHERS' INSTITUTE AND/OR THE CHRISTIAN BROTHERS OF IRELAND, INC. MAY BE LIABLE ARE INSTRUCTED TO FILE A SEXUAL ABUSE PROOF OF CLAIM FORM, CONSISTENT WITH THE BAR DATE ORDER AND THE SEXUAL ABUSE BAR DATE NOTICE. CLAIMANTS MAY OBTAIN COPIES OF THESE FORMS FROM THE CLAIMS AGENT, AT THE ADDRESSES SET FORTH HEREIN.

C. **Entities NOT Required to File Proofs of Claim by the General Bar Date:** The Bar Date Order further provides that the following Entities need not file proofs of claim by the General Bar Date or the Rejection Bar Date, as applicable:

1. Any person or entity that has already properly filed a proof of claim against the Debtors with the Clerk of the Court or with the Claims Agent;
2. Any person or entity: (a) whose claim is listed in the Schedules or any amendments thereto, and (b) whose claim is not described therein as "disputed," "contingent," or "unliquidated," and (c) who does not dispute the amount or classification of its claim as set forth in the Schedules;
3. Professionals retained by the Debtors or the Committee pursuant to orders of this Court, including Omni, who assert administrative claims for

payment of fees and expenses subject to the Court's approval pursuant to §§ 330, 331, and 503(b) of the Bankruptcy Code;

4. Any person or entity that asserts an administrative expense claim against the Debtors pursuant to §§ 503(b)(1) through (9) of the Bankruptcy Code;
5. Any person or entity whose claim against the Debtors has been allowed by an order of the Court entered on or before the applicable Bar Date; and
6. Any person or entity whose claim has been paid in full.

II. CONSEQUENCES OF FAILURE TO FILE PROOF OF CLAIM

Any Entity that is required to file a proof of claim, but fails to do so by the applicable Bar Date described in this General Bar Date Notice: (i) may NOT be treated as a creditor with respect to such Claim for the purposes of voting on and distribution under any Chapter 11 plan proposed and/or confirmed in these cases; and (ii) may be forever barred, estopped, and enjoined from asserting such Claim against the Debtors (or filing a proof of claim with respect thereto), and the Debtors and their property may be forever discharged from any and all indebtedness or liability with respect to such Claim.

If it is unclear from the Schedules whether your Claim is disputed, contingent or unliquidated as to amount or is otherwise properly listed and classified, you must file a proof of claim on or before the applicable Bar Date. Any Entity that relies on the information in the Schedules bears responsibility for determining that its Claim is accurately listed therein.

RESERVATION OF RIGHTS

The Debtors reserve the right to: (i) dispute, or to assert offsets or defenses against, any filed Claim or any Claim listed or reflected in the Schedules as to nature, amount, liability, classification or otherwise; and (ii) subsequently designate any Claim as disputed, contingent or unliquidated. Nothing contained in this Notice shall preclude the Debtors from objecting to any Claim, whether scheduled or filed, on any grounds.

PROCEDURE FOR FILING PROOFS OF CLAIM

1. One original proof of claim and one copy must be sent by mail, overnight delivery, courier or hand delivery to Omni Management Group, Christian Brothers Institute, c/o Omni Management Group, LLC, 16161 Ventura Boulevard, Suite C, PMB608, Encino, California 91436, so as to be received no later than 4:00 p.m. (prevailing Eastern Time) on the applicable General Bar Date. ***Any proof of claim submitted by facsimile or e-mail will not be accepted and will not be deemed filed until the proof of claim is submitted by the method described in the foregoing sentence.*** Proofs of claim will be deemed filed only when actually received by the Claims Agent. If you wish to receive acknowledgement of the Claims Agent's receipt of your proof of claim, you must also

submit by the General Bar Date and concurrently with submitting your original proof of claim: (i) one additional copy of your original proof of claim; and (ii) a self-addressed, stamped return envelope.

2. Proofs of claim must include all documentation required by Bankruptcy Rules 3001(c) and 3001(d), including an original or a copy of any written document that forms the basis of the Claim or, for secured Claims, evidence that the alleged security interest has been perfected.

ADDITIONAL INFORMATION

1. You may be listed as the holder of a Claim against the Debtors in the Schedules. If you hold or assert a Claim that is not listed in the Schedules or if you disagree with the amount or priority of your Claim as listed in the Schedules, or your Claim is listed in the Schedules as contingent, unliquidated, or disputed, you must file a proof of claim. Copies of the Schedules and the Bar Date Order are available for inspection during regular business hours at the office of the Clerk of the Court, United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, NY 10601. In addition, copies of the Debtors' Schedules and Bar Date Order may be viewed on the Internet at: (i) the Court's website (<http://www.nysb.uscourts.gov>) by following the directions for accessing the ECF system on such website (a PACER password is required); or (ii) the Claims Agent's Debtors-designated website at www.omnimgt.com/TheChristianBrothers
2. Questions concerning the contents of this Notice and requests for proofs of claim should be directed the Debtors' Claims Agent at **1-800-873-4094** between the hours of 9:00 a.m. and 5:00 p.m. (prevailing Eastern Time), Monday through Friday. Please note that the Claims Agent's staff is not permitted to give legal advice. You should consult your own attorney for assistance regarding any other inquiries, such as questions concerning the completion or filing of a proof of claim.

Dated: February __, 2012

BY ORDER OF THE HONORABLE ROBERT D. DRAIN
UNITED STATES BANKRUPTCY JUDGE

EXHIBIT D

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
 In re: : Chapter 11
 :
 THE CHRISTIAN BROTHERS' INSTITUTE, *et al.* : Case No.: 11-22820 (RDD)
 :
 Debtors. : (Jointly Administered)
 ----- X

**NOTICE OF DEADLINE FOR FILING CLAIMS
RELATING TO OR ARISING FROM SEXUAL ABUSE**

**TO ALL PERSONS WITH CLAIMS ARISING FROM SEXUAL ABUSE FOR WHICH
THE FOLLOWING MAY BE LIABLE:**

- THE CHRISTIAN BROTHERS' INSTITUTE
- THE CHRISTIAN BROTHERS OF IRELAND, INC.
- THE CONGREGATION OF CHRISTIAN BROTHERS
- NORTH AMERICAN PROVINCE OF THE CONGREGATION
OF CHRISTIAN BROTHERS
- EDMUND RICE CHRISTIAN BROTHERS NORTH AMERICAN PROVINCE
- EASTERN PROVINCE OF THE CONGREGATION OF CHRISTIAN BROTHERS
- WESTERN PROVINCE OF THE CONGREGATION OF CHRISTIAN BROTHERS
- THE CHRISTIAN BROTHERS OF IRELAND IN CANADA

**AUGUST 1, 2012 AT 4:00 P.M. (PREVAILING EASTERN TIME)
IS THE LAST DATE TO FILE PROOFS OF CLAIM FOR SEXUAL ABUSE**

On April 28, 2011 (the "Petition Date"), The Christian Brothers' Institute ("CBI") and The Christian Brothers of Ireland, Inc. ("CBOI"), each a debtor and debtor-in-possession in the above-captioned cases (collectively, the "Debtors") filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Southern District of New York (the "Court"). The Debtors, their addresses, case numbers, proof of claim forms, and other relevant information related to these Chapter 11 cases may be obtained at: www.omnimgt.com/TheChristianBrothers. Numerous individuals (each a "Sexual Abuse Victim" and collectively, the "Sexual Abuse Victims") have asserted sexual abuse claims against CBI and/or CBOI, on account of actions of Christian Brothers, agents, employees, teacher or volunteers.¹ Any person who believes that he or she has, or may have, a claim arising from sexual abuse for which the person believes the Debtors may be liable (each a "Sexual Abuse Claim" and collectively, the "Sexual Abuse Claims") should carefully read this notice.

¹ A list of all Brothers affiliated with the Debtors, as well as a listing of all schools and/or institutions in which the Brothers taught, performed ministry or were otherwise affiliated can be viewed at the following website www.omnimgt.com/TheChristianBrothers.

For the purposes of filing a Sexual Abuse Claim Form, **sexual abuse** is defined as any and all acts or omissions that the Debtors may be legally responsible for that in any way arise out of, are based upon, or involve sexual conduct or misconduct, sexual abuse or molestation, indecent assault, indecent battery, rape, lascivious behavior, pedophilia, ephobophilia, or sexually related 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. It is possible that under applicable law, a person may be sexually abused whether or not this activity involves explicit force, whether or not this activity involves genital or other physical contact and whether or not there is physical, psychological or emotional harm to the person.

YOU MAY WISH TO CONSULT AN ATTORNEY REGARDING THIS MATTER. YOU MAY ALSO OBTAIN INFORMATION FROM THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS BY CALLING 1-888-667-4266.

FILING DEADLINE

The United States Bankruptcy Court for the Southern District of New York has entered an order establishing **August 1, 2012 at 4:00 p.m. (prevailing Eastern Time)** as the last date and time (the "Sexual Abuse Bar Date") for each Sexual Abuse Victim to file a proof of claim form (the "Sexual Abuse Proof of Claim Form"). The Sexual Abuse Bar Date and the procedures set forth below for filing proofs of claim apply to all Sexual Abuse Claims against the Debtors, based upon acts of sexual abuse occurring prior to April 28, 2011.

WHO MUST FILE

If you believe that you have a Sexual Abuse Claim, you must file a Sexual Abuse Proof of Claim Form to maintain and/or preserve any claims that you have against the Debtors. Even if you have already filed a lawsuit against the Debtors alleging sexual abuse prior to April 28, 2011, you must still file a Sexual Abuse Proof of Claim Form to maintain and/or preserve your rights in the Debtors' Chapter 11 cases.

WHO SHOULD NOT FILE

You should not file a Sexual Abuse Proof of Claim Form if:

- Your Sexual Abuse Claim has already been paid in full;
- You hold a claim that has been allowed by an order of the Bankruptcy Court on or before the Sexual Abuse Bar Date;
- If you do not have a claim against the Debtors.

WHAT TO FILE

YOU MUST FILE A SEXUAL ABUSE PROOF OF CLAIM FORM, A COPY OF WHICH IS ENCLOSED. YOU MAY ALSO OBTAIN A COPY OF THE SEXUAL ABUSE PROOF OF CLAIM FORM BY FOLLOWING THE INSTRUCTIONS BELOW.

PROCEDURES FOR FILING A SEXUAL ABUSE PROOF OF CLAIM FORM

To file a Sexual Abuse Proof of Claim Form, you must take the following steps:

- Fill out the Sexual Abuse Proof of Claim Form.
- For additional copies of the Sexual Abuse Proof of Claim Form: (a) photocopy the Sexual Abuse Proof of Claim Form; (b) contact the Debtors' Claims Agent between the hours of 9:00 a.m. and 5:00 p.m. (prevailing Eastern Time), Monday through Friday, at **1-800-873-4094**, or (c) visit the Claims Agent's website at: **www.omnimgt.com/TheChristianBrothers**.
- **Please note that the Claims Agent's staff is not permitted to give legal advice. You should consult your own attorney for assistance regarding any other inquiries, such as questions concerning the completion or filing of a proof of claim.**
- **Do not file or mail the Sexual Abuse Proof of Claim Form with or to the Court. Instead, all Sexual Abuse Proof of Claim Forms should be sent to the Claims Agent at the address set forth below.**
- Return the completed Sexual Abuse Proof of Claim Form to the Claims Agent at the address set forth below by no later than **August 1, 2012 at 4:00 p.m. (prevailing Eastern Time)**. Sexual Abuse Proof of Claim Forms will be deemed timely filed only when they are **actually received** by the Claims Agent by **August 1, 2012 at 4:00 p.m. (prevailing Eastern Time)**.
- **Please note that a Sexual Abuse Proof of Claim Form submitted by facsimile, telecopy or electronic mail transmission will not be accepted and will not be deemed filed.** If you are returning a Sexual Abuse Proof of Claim Form by mail, allow sufficient mailing time so that the Sexual Abuse Proof of Claim Form is received on or before **August 1, 2012 at 4:00 p.m. (prevailing Eastern Time)**. Sexual Abuse Proof of Claim Forms that are postmarked before that date, *i.e.*, the Sexual Abuse Bar Date, but which are received by the Claims Agent after the Sexual Abuse Bar Date, will be considered late.
- If a Sexual Abuse Victim returns a Sexual Abuse Proof of Claim Form in person, by overnight mail or by courier service, the Sexual Abuse Proof of Claim Form should be delivered to the following address, between the hours of 9:00 a.m. and 5:00 p.m. (prevailing Eastern Time), Monday through Friday:

Omni Management Group, LLC
16161 Ventura Boulevard, Suite C
Encino, California 91436

- If a Sexual Abuse Victim returns a Sexual Abuse Proof of Claim Form by mail, the Sexual Abuse Proof of Claim Form should be mailed with sufficient lead time so that that the form is received before the Sexual Abuse Bar Date at the following address between the hours of 9:00 a.m. and 5:00 p.m. (prevailing Eastern Time), Monday through Friday:

Christian Brothers Institute
c/o Omni Management Group, LLC
16161 Ventura Boulevard, Suite C
PMB608
Encino, California 91436

CONSEQUENCES OF FAILURE TO FILE A PROOF OF CLAIM

The deadline for filing a Sexual Abuse Proof of Claim Form is **August 1, 2012 at 4:00 p.m.** (prevailing Eastern Time). Any person who has a Sexual Abuse Claim and does not file a Sexual Abuse Claim by that date may **not** be treated as a creditor for voting or distribution purposes under any plan of reorganization and such claim will be subject to discharge. Failure to file a Sexual Abuse Claim may prevent such person from voting on any plan of reorganization in these cases. Further, if such Sexual Abuse Claim is discharged, the Sexual Abuse Victim may be forever barred and prevented from asserting his or her Sexual Abuse Claim against the Debtors or their property, and may not receive any payment or distribution in connection with such Sexual Abuse Claim.

CONFIDENTIALITY

Pursuant to the Bar Date Order, filed Sexual Abuse Proofs of Claim Forms will remain confidential in these bankruptcy cases, unless you elect otherwise in Part 1 of the Sexual Abuse Proof of Claim Form. Therefore, the Sexual Abuse Proof of Claim Form that you file will not be available to the general public, but will be kept confidential, except that information will be provided to the Debtors, the Debtors' attorneys, the United States Trustee's Office for the Southern District of New York, the Debtors' insurers, attorneys for the official committee of unsecured creditors and its members, any future claims representative appointed under a plan of reorganization, any settlement trustee appointed to administer payments to Sexual Abuse Victims, prison authorities for incarcerated Sexual Abuse Victims and such other persons as the Court determines should have the information in order to evaluate the Sexual Abuse Claim, all of whom will agree to keep the information provided by you confidential.

Dated: White Plains, New York
February __, 2012

BY ORDER OF THE COURT

EXHIBIT E

BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

**In re: The Christian Brothers' Institute
and The Christian Brothers of Ireland, Inc.**

**Case No. 11-22820 (RDD)
(Jointly Administered)**

On April 28, 2011, The Christian Brothers' Institute and The Christian Brothers of Ireland, Inc. (collectively, the "Debtors") filed for protection under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code"). You may know the Debtors by the names listed below.

YOU MAY HAVE A SEXUAL ABUSE CLAIM AGAINST:

- **THE CHRISTIAN BROTHERS' INSTITUTE**
- **THE CHRISTIAN BROTHERS OF IRELAND, INC.**
- **THE CONGREGATION OF CHRISTIAN BROTHERS**
 - **NORTH AMERICAN PROVINCE OF THE CONGREGATION OF CHRISTIAN BROTHERS**
- **EDMUND RICE CHRISTIAN BROTHERS NORTH AMERICAN PROVINCE**
- **EASTERN PROVINCE OF THE CONGREGATION OF CHRISTIAN BROTHERS**
- **WESTERN PROVINCE OF THE CONGREGATION OF CHRISTIAN BROTHERS**
- **THE CHRISTIAN BROTHERS OF IRELAND IN CANADA**

IF YOU WERE SEXUALLY ABUSED BY ANY BROTHER OF THE DEBTORS OR ANY OTHER PERSON CONNECTED WITH THE DEBTORS AND WISH TO FILE A CLAIM AGAINST THE DEBTORS, YOU MUST FILE A CLAIM BY AUGUST 1, 2012 AT 4:00 P.M. (PREVAILING EASTERN TIME).

For more information, including (i) a complete list of all Brothers affiliated with the Debtors; (ii) a listing of schools and/or other institutions at which the Debtors' Brothers taught, performed ministry, or were otherwise affiliated with; or (iii) on how to obtain and file a proof of claim form and associated documents, please (a) visit the Claims Agent's designated website at www.omnimgt.com/TheChristianBrothers; (b) call the Claims Agent at **1-800-873-4094**; (c) write to the Claims Agent at Omni Management Group, 16161 Ventura Boulevard, Suite C, PMB608, Encino, California 91436; or (d) call the Official Committee Of Unsecured Creditors appointed in these cases at **1-888-667-4266**.