

EXHIBIT A

THE PLAN

[FILED AT DOCKET NO. ____]

EXHIBIT B

ORDER APPROVING DISCLOSURE STATEMENT

[RESERVED]

EXHIBIT C
CHAPTER 7 LIQUIDATION ANALYSIS

CATHOLIC DIOCESE OF WILMINGTON, INC.
LIQUIDATION ANALYSIS
(\$,000 USD)

Notes	Book Value as of 02/28/2011	Potential Recovery	
		%	\$
A	\$591	100%	\$591
B	\$9,808	100%	\$9,808
C	\$3,965	80%	\$3,172
D	\$3,369	5%	\$168
E	\$1,450	90%	\$1,305
F	\$3,975	100%	\$3,975
G	\$1,048	90%	\$943
H	\$0	100%	\$0
I	\$0		\$13,307
J	\$75,773	100%	\$75,773
K	\$8,465	100%	\$8,465
L	\$261	100%	-\$261
	\$108,183		\$117,247

Secured Debt

Liquidation Costs

Shutdown Costs	M	\$320
Litigation Support	M	\$100
Chapter 7 Trustee Fees	N	-3%
US Trustee Fees	N	\$50
Chapter 7 Professional Fees	O	\$3,500
Total Liquidation Costs		\$7,467

Net Liquidation Proceeds Available for Unsecured Creditors

\$109,779

Administrative and Priority Claims

Accrued Compensation	P	\$0
Accrued Vacation and Benefits	Q	\$148
Administrative Professional Fees	R	\$10,000
Insurance IBNR	S	\$2,644
Est. Allowed Priority Claims	T	\$0
Total Administrative and Priority Claims		\$12,792

Net Liquidation Proceeds Available for Pre Petition General Unsecured Creditors

\$96,988

	Estimated Claims		Amount of Distribution		Dist as % of Claim	
	Low Survivor Avg.	High Survivor Avg.	Low Survivor Avg.	High Survivor Avg.	Low Survivor Avg.	High Survivor Avg.
3A Survivor Claims	U	\$35,076	\$107,596	\$18,954	\$41,409	38.5% 54.0%
3B Lay Pension Claims (vested benefits)	V	\$47,190	\$47,190	\$25,499	\$18,162	38.5% 54.0%
3C DEDA Bond Transaction Claims	W	\$11,408	\$11,408	\$0	\$0	0.0% 0.0%
Gift Annuity Claims	X	\$106	\$106	\$0	\$0	0.0% 0.0%
3D Clergy Pension Claims	Y	\$9,702	\$9,702	\$5,243	\$3,734	38.5% 54.0%
3F PIA Investment Claims	Z	\$75,773	\$75,773	\$40,944	\$29,162	38.5% 54.0%
3F Miscellaneous/Trade Claims	AA	\$300	\$300	\$162	\$115	38.5% 54.0%
Lay Pension Termination Liability (unvested benefits)	AB	\$1,141	\$1,141	\$617	\$439	38.5% 54.0%
Third-Party Indemnity Claims	AC	\$9,700	\$9,700	\$5,241	\$3,733	38.5% 54.0%
PIA Breach Claims	AD	\$500	\$500	\$270	\$192	38.5% 54.0%
	\$190,896	\$263,416	\$96,930	\$96,947		

Net Liquidation Proceeds Available for Subordinated Unsecured Creditors

\$57 **\$41**

4 Penalty Claims

AE

\$0 \$0

NOTES TO LIQUIDATION ANALYSIS

I. INTRODUCTION

The Debtor, with the assistance of its restructuring professionals, has prepared this hypothetical liquidation analysis (the “Liquidation Analysis”) in connection with the Disclosure Statement. The Debtor believes the Plan satisfies the “best interest of creditors” test set forth in § 1129(a)(7) of the Bankruptcy Code with respect to each impaired Class of creditors under the Plan. The Debtor believes these Classes will receive at least as much as they would if the Debtor’s assets were liquidated in a case under chapter 7 of the Bankruptcy Code. The Debtor believes this Liquidation Analysis and the conclusions set forth herein are fair and accurate, and represent management’s best judgment with regard to the results of a liquidation of this Debtor. There are four (4) impaired Classes under the Plan:

- Class 3A Claims (Survivor Claims);
- Class 3B Claims (Lay Pension Claims);
- Class 3C Claims (DEDA Bond Transaction Claims);
- Class 4 Claims (Penalty Claims).

In addition, there are three (3) potentially impaired¹ Classes under the Plan:

- Class 3D Claims (Clergy Pension Claims);
- Class 3E Claims (Gift Annuity Claims); and
- Class 3F Claims (Other Unsecured Claims).

The Liquidation Analysis is based on the Debtor’s unaudited and preliminary balance sheet as of February 28, 2011, appraisals of the Debtor’s real estate and certain other personal property, and other information as disclosed in the Debtor’s Schedules and Statement of Financial Affairs, and assumes a hypothetical conversion of the Debtor’s current Chapter 11 Case to a case under chapter 7 of the Bankruptcy Code on or about August 1, 2011 (the “Liquidation Date”). It further assumes that all parishes would stop paying assessments or otherwise providing financial support to the Debtor immediately upon conversion to chapter 7.

The Liquidation Analysis also assumes that the liquidation of the Debtor would be completed during a four-month period after the Liquidation Date, during which time all of the Debtor’s major assets would be sold and initial distributions to creditors would be made, net of liquidation-related costs. Although the liquidation of some assets might not require four months, other assets would be more difficult to collect or sell, thus requiring a liquidation period that could require substantially longer than four months. The liquidation period would allow

¹ These Classes are unimpaired in a Settlement Plan, but in a CDOW-Only Plan (i) Class 3F is impaired and (ii) Classes 3D and 3E may become impaired in the event the restricted assets available to satisfy the claims in these Classes are determined to be Unrestricted Assets of the Debtor’s Estate.

for the orderly sale or abandonment of fixed assets and the orderly wind-down of daily operations. For certain assets, estimates of the liquidation values were made for each asset individually. For other assets, liquidation values were assessed for general classes of assets by estimating the percentage recoveries that a trustee might achieve through an orderly disposition. It is presumed that over an additional 18-month period, the chapter 7 trustee would resolve all claims and other matters involving the Debtor's estate and make additional distributions.

It is assumed that proceeds realized from the liquidation of the Debtor's unrestricted assets would be aggregated in a common distribution "pot". For purposes of this Liquidation Analysis, each and every Claim asserted against the Debtor is presumed to be entitled to a distribution from the aggregated net proceeds. Neither the Debtor nor its restructuring advisor has evaluated the validity or value of these claims. The Debtor, if before the Liquidation Date, or the chapter 7 trustee, if after the Liquidation Date, may object to certain Claims. Certain assets or their proceeds are only available to satisfy certain claims due to legally enforceable restrictions on the use or distribution of such funds. The Liquidation Analysis assumes that each claim for which restricted funds are available (specifically, the DEDA Bond Transaction Claims, Clergy Pension Claims, and Gift Annuity Claims) would first be paid to the extent of the restricted funds, and the remaining claim, if any, would then share *pari passu* with other general unsecured claims as necessary to provide the holder of such claim with a percentage recovery at least equal to the percentage paid to other creditors. The Liquidation Analysis further assumes that, if a given creditor's percentage recovery from restricted assets exceeded the percentage recovery for general unsecured claims from general assets, the chapter 7 trustee would make no further distributions to such creditor.

The Liquidation Analysis reflects the estimated cash proceeds, net of estimated liquidation-related costs, that would be realized if the Debtor were to be liquidated in an orderly manner through a chapter 7 process. The Liquidation Analysis assumes that liquidation proceeds would be distributed in accordance with § 726 of the Bankruptcy Code. If a chapter 7 liquidation were pursued for the Debtor, the amount of liquidation value available to unsecured creditors would be reduced (i) by the costs of the liquidation, including fees and expenses of the chapter 7 trustee, fees and expenses of other professionals retained by the trustee to assist with the liquidation, and asset disposition expenses; and (ii) by priority and administrative claims against the bankruptcy estate, including unpaid operating expenses and any accrued and unpaid professional fees allowed in the chapter 11 case.

A chapter 7 liquidation would likely prompt certain other events to occur, including the establishment of a new bar date for asserting claims, the termination of the Debtor's pension and benefit plans, and the rejection of remaining executory contracts and unexpired leases, including equipment leases. In addition, several Third-Party Indemnity Claims relating to sexual abuse litigation may be asserted against the Debtor by certain Non-Debtor Catholic Entities. If the Plan is confirmed as a Settlement Plan, the Third-Party Indemnity Claims of the Non-Debtor Catholic Entities are waived, and Cash is contributed to the Settlement Trust for the sole benefit of holders of Survivor Claims. In a chapter 7 liquidation, and under the Plan if confirmed as a CDOW-Only Plan, Third-Party Indemnity Claims would not be waived. Thus, a hypothetical chapter 7 estate would likely be subjected to considerably more claims than would the chapter 11 Estate if the Plan were confirmed as a Settlement Plan. Estimated claim amounts for some, but not all, of these categories of additional claims are set forth in the Liquidation Analysis. No

attempt has been made to estimate each and every additional general unsecured claim that might result in the event of a liquidation under chapter 7.

This Liquidation Analysis necessarily contains an estimate of the amount of liquidated Claims that will ultimately become Allowed Claims, but generally assumes that Disputed Claims against the Debtor will be resolved in favor of the Debtor. Accordingly, estimates for non-Survivor claims are based solely upon the Debtor's own books and records. Estimation of Survivor Claims for purposes of this Liquidation Analysis is discussed below.

The Liquidation Analysis assumes that there are no recoveries from the pursuit of any potential preferences, fraudulent conveyances, or other causes of action and does not include the estimated costs of pursuing those actions.

II. GLOBAL NOTES

A. Basis of Presentation

To the extent possible, the Liquidation Analysis reflects the assets and liabilities of the Debtor as shown in its Financial Statements. The Financial Statements do not, and thus the Liquidation Analysis does not, purport to represent financial information prepared in accordance with U.S. Generally Accepted Accounting Principles.

B. Causes of Action

As of the time the Debtor prepared this Liquidation Analysis, the Debtor was unaware of any viable causes of action against third parties, other than cross-claims and/or counterclaims asserted, or that may be asserted, in connection with pending litigation. The Debtor during the course of the bankruptcy has reserved all of its rights with respect to any causes of action it may have against any party, and as a result, the chapter 7 trustee could choose to bring such causes of action and these causes of action may affect the assets and/or expenses of the estate.

C. Valuation

The Debtor is a tax-exempt, not-for-profit corporation and has not adopted Statement of Financial Accounting Standards No. 93 ("SFAS93"). SFAS93 requires not-for-profit organizations to recognize depreciation as a cost of using up the future economic benefits of its long-lived tangible assets. Since the Debtor has not adopted SFAS93, it does not recognize and record depreciation on its property and equipment or any other asset. Accordingly, owned property and equipment are stated on the Debtor's books at original cost plus, in some circumstances, the cost of capital improvements. It would be unduly burdensome and an inefficient use of estate assets for the Debtor to obtain current market valuations of all of its assets in connection with the preparation of this Liquidation Analysis. However, the Debtor did obtain appraisals on its collection of rings, crosses and chalices, and certain of its real estate. These assets continue to be carried on the Debtor's books at cost, but for purposes of this Liquidation Analysis, appraised values for insurance purposes were used.

D. The Pooled Investment Account

Assets within the Pooled Investment Account include (i) Disputed Non-Debtor PIA Funds, (ii) Restricted PIA Funds, and (iii) Unrestricted PIA Funds (collectively with the Disputed Non-Debtor PIA Funds and the Restricted PIA Funds, "Pooled Investment Assets"). Pooled Investment Assets are valued as of February 28, 2011, the close of the last reporting period for which data is available prior to the date this analysis was prepared.

In the PIA Litigation, the Bankruptcy Court ruled that the Disputed Non-Debtor PIA Funds are property of the Debtor's bankruptcy estate, which ruling is currently on appeal. If the Bankruptcy Court's ruling were overturned, the assets shown in this Liquidation Analysis would be reduced by approximately \$84.2 million and the liabilities would be reduced by approximately \$75.8 million, which would substantially reduce the percentage distribution to creditors. The Plan contemplates that, if the Plan is confirmed as a CDOW-Only Plan, Disputed Non-Debtor PIA Funds will be held in escrow pending resolution of the PIA Litigation by a Final Order. However, for purposes of this Liquidation Analysis, it is assumed that the Disputed Non-Debtor PIA Funds are unrestricted assets of the estate distributable to general creditors.

E. Restricted Assets

A substantial portion of the Debtor's assets are subject to donor-imposed restrictions on use or disposition which the Debtor believes preclude the use of such assets, or proceeds thereof, to satisfy the claims of general creditors of the Debtor. The majority of these Restricted Assets are maintained in the Pooled Investment Account. The Liquidation Analysis assumes that, consistent with § 363(d)(1) of the Bankruptcy Code, the chapter 7 trustee would abide by any legally enforceable restrictions to which Restricted Assets are subject, and would not use Restricted Assets for general administrative or corporate purposes, or to satisfy the claims of general creditors. For this reason, Restricted Assets are not listed as a "top line" asset in the Liquidation Analysis. However, as noted above and discussed below with respect to the DEDA Bond Transaction Claims, the Clergy Pension Claims, and the Gift Annuity Claims, the Liquidation Analysis does assume that the chapter 7 trustee would exhaust any Restricted Assets before making a distribution on such claim from unrestricted assets.

E. Reservation of Rights

Estimation of claims in this Liquidation Analysis is not intended, nor should it be construed, as an admission or acknowledgment of the validity or amount of any Claim. Except as expressly provided, and expressly subject to confirmation of, the Plan, the Debtor reserves all rights with respect to all Claims asserted against the Estate.

III. LINE-ITEM NOTES

A. Unrestricted Cash and Cash Equivalents

Represents unrestricted cash held in corporate accounts as of February 28, 2011. Prior to the Liquidation Date, this balance would be expected to be reduced by the amount set forth in line L

(Impact of Operations on Gross Proceeds). Projected cash balances are valued at 100% for purposes of the Liquidation Analysis.

B. Unrestricted PIA Funds

Unrestricted PIA Funds comprise various types of investment options including: securities, corporate bonds, government bonds and treasuries, many of which fluctuate substantially in value. These investment options are held either separately or in various managed investment funds as part of the Pooled Investment Account. No attempt has been made to project the market value of these assets as of the Liquidation Date, and they have been valued at their market value as of February 28, 2011.

For purposes of this Liquidation Analysis, the total Unrestricted PIA Funds includes the Lay Pension Fund. The Lay Employees Committee has commenced an action asserting that the Lay Pension Fund is restricted to be used only for payment of Lay Pension Claims. Because the Lay Pension Litigation has commenced, the Plan contemplates that, in a CDOW-Only Plan, the Lay Pension Fund will be held in escrow pending resolution of such litigation. However, for purposes of the chapter 11 distribution analysis and this Liquidation Analysis, it is assumed that the Lay Pension Fund is an unrestricted asset of the estate distributable to general creditors. In a Settlement Plan, the Lay Pension Fund would be contributed to the Lay Pension Plan Trust by the Debtor.

C. Real Estate

The real estate of the Debtor consists of a variety of buildings and the land on which they sit, and is identified in Section III.B.3. of the Disclosure Statement. All real estate has been independently appraised and the value in the Liquidation Analysis reflects these appraised values. Due to the passage of time since the appraisals and the current state of the real estate markets in Delaware, as well as the costs that would be associated with any sale, the Liquidation Analysis assumes a recovery of 80% of the appraised value of the real property. Due to market conditions and risk, the value realized from the sale of the real property may be higher or lower than the value assumed by the Liquidation Analysis, and this variance may be significant.

D. Accounts Receivable

The Debtor's accounts receivable comprise outstanding parish assessments and rights to reimbursement from Non-Debtor Catholic Entities for health insurance and workers' compensation insurance.

It is anticipated that the vast majority of non-parish accounts receivable and parish accounts receivable for health and workers compensation insurance will have been fully converted to cash that is included in the estimated cash balance as of the Liquidation Date. The Liquidation Analysis assumes that receivables for parish assessments will be uncollectible by the chapter 7 trustee because there is no secular legal basis for payment or collection of these amounts. As such, for purposes of this Liquidation Analysis, accounts receivable are valued between 0% and 10% of their book value.

E. Notes Receivable

Notes Receivable of the Debtor are assumed for the purposes of this Liquidation Analysis to be legally enforceable. It is further assumed that collections on the Notes Receivable would be approximately 85%-95% of the net book value.

F. PIA Distribution Clawback

This represents distributions made to non-debtor Pooled Investment Participants on account of their respective Disputed Non-Debtor PIA Funds between the Petition Date and February 28, 2011, pursuant to the series of interim orders entered by the Bankruptcy Court. The orders provide that such distributions are presumed to be recoverable pursuant to § 549 of the Bankruptcy Code, subject to the non-debtor Pooled Investment Participants' right to rebut such presumption. For purposes of the Liquidation Analysis it is assumed (i) that no non-debtor Pooled Investment Participant would rebut the presumption of avoidability with respect to any of these distributions, and (ii) accordingly, the chapter 7 trustee would set off the amount of these distributions dollar-for-dollar against any distributions to be made on account of PIA Investment Claims. The foregoing assumptions are for illustration purposes only, and are without prejudice to the right of any non-debtor Pooled Investment Participant to rebut the presumption of avoidability established by the Bankruptcy Court's orders (which would eliminate the chapter 7 trustee's setoff rights and, as a result, reduce the amount of assets available for distribution to other creditors).

G. Miscellaneous Unrestricted Assets

The Debtor has estimated a realizable value for certain personal property. This property includes items such as used furniture and appliances. It also includes miscellaneous artwork. The Debtor determined that the benefit of assigning a realizable value to a relatively small amount of used personal property did not justify the significant cost and delay in obtaining a professional appraisal.

The Debtor expects to receive the net proceeds from the sale of the property owned by St. Stanislaus Kostka parish. Because the Debtor's expectancy interest in proceeds of real property is not an interest in the property itself, its value is included in the Miscellaneous Unrestricted Assets, not the Real Estate.

The Debtor's collection of former bishops' rings, crosses, and chalices, are listed at replacement value included in a professional appraisal dated December 8, 2009. Replacement value is used to designate the amount of insurance that may be or should be carried on items of personal property in order to indemnify someone in the event of loss or damage. The actual realizable value of these items (e.g., in a sale) may differ materially from the replacement value. Indeed, the Debtor also obtained an appraisal at fair market value of these items, which was significantly less than the replacement value.

The Debtor is occasionally the beneficiary of wills and trusts. However, these endowments are completely at the discretion of the donor and are inherently revocable. The Debtor cannot ascertain whether it will be the beneficiary of such endowments nor can it ascertain any amount relating thereto. Accordingly, the value is estimated at \$0.00.

The Debtor has estimated a realizable value for its automobiles based upon the Kelley Blue Book website (www.kbb.com), using the “fair” to “good” condition range.

The Debtor has estimated a realizable value for its used office equipment and furniture, with the assistance of its restructuring advisors using their experience in disposing of these types of assets in other cases and the current market conditions for such assets.

H. Interest in Life Insurance Policies, less Restrictions

The Debtor is the beneficiary of a number of life insurance policies. Because these policies were part of a solicitation for restricted education purposes, the value of these policies is not available to general unsecured creditors and the value in the Liquidation Analysis is \$0.00.

I. Insurance Recoveries

The Debtor has an interest in a number of liability insurance policies covering a number of periods (the “Liability Coverage”). The details of the Liability Coverage have been shared with the Official Committee of Unsecured Creditors and are discussed at length in the Disclosure Statement. The Debtor reserves all rights with respect to the Liability Coverage. This amount represents the estimated insurance proceeds that would be realized by the chapter 7 trustee from the Debtor’s interest in the Liability Coverage.

J. Disputed Non-Debtor PIA Funds (as of Petition Date)

This represents the value of the Disputed Non-Debtor PIA Funds as of October 20, 2009, the nearest day to the Petition Date for which reliable data is available.

K. Disputed Non-Debtor PIA Funds (Post-Petition Appreciation)

This represents the appreciation in the value of the Disputed Non-Debtor PIA Funds between October 20, 2009, and February 28, 2011.

L. Impact of Operations on Gross Proceeds

The Debtor has analyzed its projected revenue and expenses for the period from March 1, 2011 through July 31, 2011. This number represents the estimated net decrease to Gross Liquidation Proceeds that operations will have during the period between the valuation date and the Liquidation Date. This projection further assumes that CVA defendant Parish Corporations will not withhold assessment funding from CDOW prior to the Effective Date to defray the cost of litigation against them.

M. Shutdown Costs; Litigation Support

Estimates for corporate payroll and operating costs incurred during the liquidation are based upon the assumption that certain corporate functions would be retained to oversee the liquidation process. Certain minimum staff would be required at the physical locations during the four months of the liquidation period to prepare necessary financial documents, to review and preserve files and store documents. For purposes of estimating the maximum liquidation value

for the Debtor, no payments for employee retention or incentives through the chapter 7 liquidation period are assumed to be made.

The hypothetical chapter 7 trustee would require support after shutdown from current Debtor employees to effectively collect receivables, negotiate and/or dispute claims, provide court testimony in claims resolution matters, and assist in insurance negotiations. In a chapter 7 the cost of these people are wind-down expenses. In the Plan, if confirmed as a CDOW-Only Plan, these services are provided by the Reorganized Debtor without employee cost to the Plan Trust.

N. Chapter 7 Trustee Fees; U.S. Trustee Fees

Chapter 7 trustee fees include those fees associated with the appointment of a chapter 7 trustee in accordance with § 326 of the Bankruptcy Code. Under the Bankruptcy Code, trustee fees are subject to caps depending on the amount of distributions made, generally at rates between 3% and 5% of the total liquidation value of the Debtor. U.S. Trustee fees are quarterly fees assessed on disbursements from the bankruptcy estate.

O. Chapter 7 Professional Fees

Chapter 7 professional fees include legal, appraisal, broker and accounting fees expected to be incurred during the liquidation period that are not already deducted from liquidation values. Professional fees are assumed to be \$3.5 million for legal advisors, financial advisors and other expenses because significant issues remain that will most likely require litigation. Trustee professionals will spend significant time getting up to speed on difficult issues that the Debtor has already paid its professionals to learn.

P. Accrued Compensation

This amount includes accrued employee compensation and related taxes. The Debtor pays payroll at the end of each month that is current through the date of the payroll. Because the Liquidation Analysis assumes a beginning-of-month Liquidation Date, accrued payroll is expected to be \$0.00.

Q. Accrued Vacation and Benefits

The Debtor accrues for its vacation obligation. Vacation is earned on the first day of the Debtor's fiscal year (July 1) for the year. For purposes of this Liquidation Analysis, the accrued but unused vacation obligation balance on the Debtor's records on its February 28, 2011, financial statements is used as the balance on the Liquidation Date as an accrued administrative expense.

R. Chapter 11 Professional Fees

Chapter 11 professional fees include legal, appraisal, financial advisory and/or accounting fees, for retained firms and those expected to be retained, that have been incurred or are projected to be incurred through the assumed Liquidation Date.

In the chapter 11 distribution analyses, by way of comparison, the Debtor assumed that, between March 1, 2011, and an assumed Effective Date of August 1, 2011, there will be chapter 11 administrative expenses (including previously accrued, but unpaid) of (i) \$10 million, if the Plan is confirmed as a CDOW-Only Plan, and (ii) \$6.5 million if the Plan is confirmed as a Settlement Plan.

S. Insurance IBNR Reserves

The Debtor provides self-insured medical plans for lay employees of the Debtor and the Non-Debtor Catholic Entities and for clergy. This line item represents the amount of cash needed to pay medical claims for services provided during the pendency of the Chapter 11 Case and prior to the Liquidation Date, but not yet paid. Claims for medical benefits are estimated to come in for three months after the service date. The Third-Party Administrators have estimated these claims at approximately \$225,000 per week and suggest that approximately three months of bills remain incurred but not paid at any point in time. These constitute an administrative expense of the Debtor.

T. Priority Claims

The Debtor believes it will have insubstantial, if any, Priority Claims. The Debtor is a not-for-profit corporation and does not file or pay income or property taxes, and prepetition payroll has been paid during the bankruptcy.

U. Survivor Claims

The item represents the Debtor's estimate of the range of allowed Survivor Claim, including compensatory damages only. The Debtor arrived at the "low" and "high" amounts for Allowed Survivor Claims by multiplying the 148 Survivor Claims asserted in this Chapter 11 Case² by, respectively, (i) the average payout per abuse claim in the chapter 11 case of the Diocese of Davenport, Iowa (approximately \$237,000), and (ii) twice the average payout per abuse claim under the settlements in the chapter 11 cases of the Davenport diocese, the Archdiocese of Portland, Oregon, the Diocese of Spokane, Washington, and the Diocese of Tucson, Arizona, and the proposed settlement in this Chapter 11 Case ($\$363,500 \times 2 = \$727,000$).³ As of the date of this Liquidation Analysis, no order or finding has been entered by the Bankruptcy Court or any other court estimating or otherwise fixing the amount of any Survivor Claim against the Debtor.

The Debtor believes that nationwide bankruptcy settlements are likely to be better predictors of the ultimate amount of Allowed Survivor Claims in this case than prepetition settlements by the Debtor and nationwide non-bankruptcy settlements, in particular because settlements outside of bankruptcy are made against a backdrop of potential punitive damages and the possible

² In addition to the 147 Confidential Tort Proofs of Claim filed by Survivors in this case, one Parish-Only Survivor Claimant was assigned a Parish Corporation's Third-Party Indemnity Claim against the Debtor as part of a settlement between the Parish-Only Survivor Claimant and the Parish Corporation. The Plan provides that this Third-Party Indemnity Claim will be treated for all intents and purposes as a Survivor Claim against the Debtor.

³ The Debtor excluded from this calculation the average payout per abuse claim in the Diocese of Fairbanks, Alaska case, which was approximately \$33,000 per claim, plus an as-yet undetermined amount of insurance proceeds.

avoidance of bankruptcy,⁴ both of which command a premium not specifically related to the amount of compensatory damages that would be awarded on account of the abuse at issue.

The Debtor also believes that nationwide bankruptcy settlements are likely to be better predictors of the ultimate amount of Allowed Survivor Claims in this case than the few Delaware jury verdicts that are available for comparison, because the settlements have covered a much wider population of claims, and in a bankruptcy context where, again, the threat of punitive damages is muted. Abuse verdicts by Delaware juries against individual Perpetrators (premised upon an intentional tort theory) have resulted in significant compensatory and punitive damage awards, whereas recent damages awards against corporate defendants (premised upon a negligence and/or gross negligence theory) have been \$0 (against the Oblates of St. Francis de Sales, which judgment was reversed on appeal (retrial pending)) and \$3 million (against St. Elizabeth Roman Catholic Church).

V. Lay Pension Claims (Vested Benefits)

The Debtor maintains the Lay Pension Plan for employees of the Debtor and the Non-Debtor Catholic Entities. This plan is not governed by ERISA funding requirements and is substantially underfunded. The “vested” Lay Pension Claims represent the estimated net present value of future pension benefits that were vested as of January 1, 2010, based upon actuarial assumptions as to life expectancies and the applicable discount rate. For the purpose of this Liquidation Analysis, the Debtor estimated the value of these claims based upon actuarial analysis performed by The Standard, an independent provider of financial products and services.

W. DEDA Bond Transaction Claims

The DEDA Bond Transaction Claims arise from an unsecured letter of credit issued in connection with a tax-exempt public bond financing obtained by the Debtor for the construction of schools prepetition. For purposes of this Liquidation Analysis, the DEDA Bond Transaction Claims are estimated to be equal to the amount asserted in Allied Irish Bank’s proof of claim, plus the claims for interest and expenses by Wilmington Trust. The Liquidation Analysis further assumes that the chapter 7 trustee would satisfy the DEDA Bond Transaction Claims using the restricted Capital Campaign Fund (valued at approximately \$8.9 million as of February 28, 2011). Because the resulting percentage distribution on the DEDA Bond Transaction Claims from the Capital Campaign Fund would exceed – substantially – the percentage distribution to general creditors from unrestricted assets, the Liquidation Analysis assumes the chapter 7 trustee would make no further distributions upon the DEDA Bond Transaction Claims. If the Capital Campaign Fund were determined to be an unrestricted asset of the estate, the assets available for distribution to general creditors would increase in an amount equal to the value of the Capital Campaign Fund, and the DEDA Bond Transaction Claims would share *pari passu* with all general creditors.

⁴ The Diocese of San Diego, California reached a settlement during its chapter 11 case which was effectuated outside of bankruptcy following the voluntary dismissal of the case. The Debtor considers this to be a non-bankruptcy settlement, however, because that chapter 11 case was at peril of involuntary dismissal had a settlement not been reached.

X. Gift Annuity Claims

The Debtor holds several Gift Annuity Funds (having an aggregate value of approximately \$106,000 as of February 28, 2011), representing tax-advantaged gifts made to the Debtor in exchange for a stream of income to the donor during his or her lifetime. The gifts are invested in the Pooled Investment Account as Restricted PIA Funds and the earnings therefrom are used to pay the donor-annuitant. Upon the donor-annuitant's death, the gift becomes a general unrestricted asset of the Debtor. For purposes of this Liquidation Analysis, it is assumed the net present value of future annuity payments due to the donor-annuitants is equal to the value of the Gift Annuity Funds, and that the holders of Gift Annuity Claims would receive their respective Gift Annuity Funds in full satisfaction of their claims in a hypothetical chapter 7 liquidation. If the Gift Annuity Funds were determined to be unrestricted assets of the estate, the assets available for distribution to general creditors would increase in an amount equal to the value of the Gift Annuity Funds, and the Gift Annuity Claims would share *pari passu* with all general creditors.

Y. Clergy Pension Claims

The Debtor maintains a pension plan for the benefit of diocesan clergy. This plan is not governed by ERISA funding requirements and is substantially underfunded. The Clergy Pension Claims represent the estimated net present value of future pension benefits that were vested as of the Petition Date, based upon actuarial assumptions as to life expectancy and the applicable discount rate. The Liquidation Analysis further assumes that the chapter 7 trustee would satisfy the Clergy Pension Claims using the restricted Clergy Pension Fund (valued at approximately \$3.7 million as of February 28, 2011). Because the resulting percentage distribution on the Clergy Pension Claims from the Clergy Pension Fund would be less than the percentage distribution to general creditors from unrestricted assets, the Liquidation Analysis assumes the chapter 7 trustee would make further distributions upon the Clergy Pension Claims from general assets until the percentage distribution on such claims at least equaled the percentage distribution on general claims. If the Clergy Pension Fund were determined to be an unrestricted asset of the estate, the assets available for distribution to general creditors would increase in an amount equal to the value of the Clergy Pension Fund, and the Clergy Pension Claims would share *pari passu* with all general creditors.

Z. PIA Investment Claims

Section 502(b) of the Bankruptcy Code requires claims to be allowed as of the Petition Date. Accordingly, this amount reflects the value of the Disputed Non-Debtor PIA Funds as of October 20, 2009, the nearest day to the Petition Date for which reliable data is available.

AA. Miscellaneous/Trade Claims

For purposes of the Liquidation Analysis, it is assumed that unsecured claims will consist of the Debtor's accounts payables as of the Petition Date, less any amounts entitled to priority under §§ 503(b)(9) and 507(a)(4) of the Bankruptcy Code. The Debtor expects that additional claims might arise as a result of cessation of operations as contemplated herein, but does not expect such claims to be substantial in amount.

AB. Lay Pension Claims (Unvested Benefits)

The “unvested” Lay Pension Claims represent the estimated net present value of future pension benefits that were accrued and unvested as of January 1, 2010, but which may become vested upon termination of the Lay Pension Plan. Estimates were based upon analysis performed by The Standard, an independent provider of financial products and services, utilizing actuarial assumptions as to life expectancies and the applicable discount rate.

AC. Third-Party Indemnity Claims

This amount represents Third Party Indemnity Claims, primarily of Parish Corporations, arising from or relating to Survivor Claims. As of the date of this Liquidation Analysis, no order or finding has been entered by the Bankruptcy Court or any other court estimating or otherwise fixing the amount of any Third-Party Indemnity Claim against the Debtor.

AD. PIA Breach Claims

This amount represents the estimated claims for indemnification and reimbursement of legal fees and costs incurred by the non-debtor Pooled Investment Participants in defense of the PIA Litigation, and other amounts that may be asserted by the Pooled Investment Participants as consequential damages resulting from the Debtor’s alleged breach of fiduciary duties in connection with the Pooled Investment Account.

AE. Penalty Claims

Under the Bankruptcy Code, Penalty Claims (including, without limitation, any claims for punitive damages in connection with Survivor Claims) are subordinated to general unsecured creditors for distribution purposes. Because general unsecured claims would not be paid in full in a hypothetical chapter 7 liquidation, Penalty Claims would receive no distribution. Accordingly, no estimate of the potential allowed amount of Penalty Claims, if any, is provided.

EXHIBIT D
FINANCIAL PROJECTIONS

Catholic Diocese of Wilmington, Inc.

After Expense Reductions

	Actual FY 2009	Actual FY 2010	Projection CY 2011	Projection CY 2012	Projection CY 2013
General Revenues:					
Assessments	3,869,750	49%	3,863,750	49%	3,929,897
Net Appeal	3,846,175	48%	4,057,580	51%	4,000,000
Communications Collection	21,862	0%	10,567	0%	15,000
Campaign for Human Development Collection	3,000	0%	3,000	0%	3,000
Affiliated Pension Contribution	175,097	2%	391,400	5%	415,236
Gifts and Contributions and Other	<u>46,990</u>	1%	<u>35,000</u>	0%	<u>35,000</u>
Total Revenues	7,962,874	100%	7,962,533	100%	8,186,039
Net Budget Expenses:					
Administration	2,260,312	31%	2,706,589	40%	2,405,688
Pension Contribution	1,000,000	14%	250,000	4%	1,750,000
Catholic Charities	1,233,454	17%	1,131,211	17%	744,898
Catholic Education	881,209	12%	864,273	13%	760,741
Communications	121,058	2%	113,030	2%	280,090
Development	489,600	7%	503,909	7%	518,814
Finance	567,485	8%	575,357	8%	513,610
Pastoral Services	<u>773,425</u>	<u>11%</u>	<u>698,323</u>	<u>10%</u>	<u>824,561</u>
Net Budget Expenses	7,326,543	100%	6,842,692	100%	7,798,403
Operating Surplus (Deficit)	636,331	1,119,841	117,817	149,951	160,976
Less: Non-Operating Expenses					
Support to St. Thomas More Academy	556,669	73%	211,960	70%	0
Support to Parishes & Schools	0	0%	0	0%	0
Support to Most Blessed Sacrament	<u>201,900</u>	<u>27%</u>	<u>92,412</u>	<u>30%</u>	<u>0</u>
Total Non-Operating Expenses	758,569	100%	304,372	100%	0
Total Surplus (Deficit)	(122,238)	815,469	117,817	149,951	160,976

EXHIBIT E

INSURANCE COVERAGE PRE-1977

Wright Deen Church / Educational Coverages

WRLSUP	SA	CH	420145	Corpus Christi Church	12 @ 8/1/160	Ex Public Liability	Ex 25,000/50,000/100,000 excess of 10,000/20,000	NM	41852	Found
WRLSUP	124	CH	422644	Corpus Christi Church	12 @ 8/1/161	Ex Public Liability	Ex 10,000/20,000/50,000 10,000/20,000	NEW	420145	Found
WRLSUP	124	CH	422645	Corpus Christi Church	12 @ 8/1/161	Ex Public Liability	Ex 10,000/20,000/50,000 10,000/20,000	CH	422644	Found
WRLSUP	124	CH	423686	Corpus Christi Church	12 @ 8/1/162	Ex Public Liability	Ex 10,000/20,000/50,000 10,000/20,000	CH	422645	Found
WRLSUP	124	CH	423687	Corpus Christi Church	12 @ 8/1/163	Public Liability	Ex 10,000/20,000/50,000 10,000/20,000	CH	422646	Found
WRLSUP	124	CH	425739	Corpus Christi Church	12 @ 8/1/163	Public Liability	Ex 10,000/20,000/50,000 10,000/20,000	CH	422646	Found
WRLSUP	87	CH	429364	Corpus Christi Church	36 @ 15/10/65	Ex Public Liability	Ex 10,000/20,000/50,000 10,000/20,000	CH	429355	Found
WRLSUP	58	NM	420125	Holy Rosary Church	12 @ 23/11/60	Ex Public Liability	Ex 10,000/20,000/50,000 10,000/20,000	NM	418533	Found
WRLSUP	124	CH	422629	Holy Rosary Church	12 @ 23/11/61	Public Liability	Ex 10,000/20,000/50,000 10,000/20,000	NEW	420135	Found
WRLSUP	124	CH	422630	Holy Rosary Church	12 @ 23/11/61	Ex Public Liability	Ex 10,000/20,000/50,000 10,000/20,000	NM	420135	Found
WRLSUP	86	NM	428858	Holy Rosary Church	12 @ 24/8/85	Physical Damage	Physical Damage only PI 50,000/100,000/100,000	N/A	429535	Found
WRLSUP	92	CH	430953	Holy Rosary Church	36 @ 24/8/85	CGI	PI 50,000/100,000/100,000 PD 5,000/10,000/25,000	CH	429535	Found
WRLSUP	102	CH	435904	Holy Rosary Church	36 @ 24/8/85	CGI	PI 50,000/100,000/100,000 PD 5,000/10,000/25,000	CH	430953	Found
WRLSUP	164	WA	510322	Holy Rosary Church	36 @ 24/8/75	CGI	PI 100,000/200,000/200,000 PD 10,000/20,000/50,000	CH	601827	Found
WRLSUP	163	WA	510253	Immaculata Conception Church	36 @ 9/9/75	CGI	PI 100,000/200,000/200,000 PD 10,000/20,000/50,000	CH	601827	Found
WRLSUP	124	CH	422713	Mother of Sorrows Church	12 @ 19/5/62	Public Liability	PI 50,000/100,000/100,000 Ex 10,000/20,000/50,000	NEW	418533	Found
WRLSUP	124	CH	422714	Mother of Sorrows Church	12 @ 19/5/62	Ex Public Liability	PI 50,000/100,000/100,000 Ex 10,000/20,000/50,000	CH	420729	Found
WRLSUP	57	NM	418500	Old St. Josaphat's Church	12 @ 18/4/60	Ex Public Liability	PI 50,000/100,000/100,000 Ex 10,000/20,000/50,000	NM	418508	Found
WRLSUP	124	CH	420526	Old St. Josaphat's Church	12 @ 18/4/61	Ex Public Liability	PI 50,000/100,000/100,000 Ex 10,000/20,000/50,000	NM	418180	Found
WRLSUP	124	CH	422710	Old St. Joseph's Church	18/4/62 - 1/5/62	Public Liability	PI 10,000/20,000/50,000 PD 5,000/10,000	NEW	418508	Found
WRLSUP	91	CH	430559	Our Lady of Good Council Church	36 @ 25/7/65	CGI	PI 25,000/50,000/50,000 PD 5,000/10,000/25,000	CH	430525	Found
WRLSUP	102	CH	435795	Our Lady of Good Council Church	36 @ 25/7/69	CGI	PI 25,000/50,000/50,000 PD 5,000/10,000/25,000	NM	430529	Found
WRLSUP	124	CH	423470	Our Lady of Lourdes	12 @ 24/4/62	Public Liability	PI 10,000/20,000/50,000 Ex 10,000/20,000/50,000	NEW	423470	Found
WRLSUP	124	CH	423471	Our Lady of Lourdes	12 @ 24/4/62	Ex Public Liability	PI 10,000/20,000/50,000 Ex 10,000/20,000/50,000	NEW	423471	Found
WRLSUP	124	CH	424558	Our Lady of Lourdes	12 @ 24/4/63	Public Liability	PI 10,000/20,000/50,000 Ex 10,000/20,000/50,000	CH	603638	Found
WRLSUP	124	CH	424557	Our Lady of Lourdes	12 @ 24/4/63	Ex Public Liability	PI 10,000/20,000/50,000 Ex 10,000/20,000/50,000	CH	603638	Found
WRLSUP	165	WA	510566	Our Mother of Sorrows Church	36 @ 6/7/66	CGI	PI 50,000/100,000/100,000 PD 5,000/10,000/25,000	NEW	418533	Found
WRLSUP	124	CH	422660	Sacred Heart Church	12 @ 6/11/61	Public Liability	PI 10,000/20,000/50,000 PD 5,000/10,000/25,000	CH	422660	Found

WRUSLIP 124 CH	422661	Sacred Heart Church	12 @ 5/1/51	Ex. Public Liability	Bl 25,000/20,000 excess of 10,000/20,000	NM	420144	Found
WRUSLIP 124 CH	423698	Sacred Heart Church	12 @ 5/1/52	Public Liability	Bl 10,000/10,000 CH 5,000	CH	422660	Found
WRUSLIP 124 CH	423699	Sacred Heart Church	12 @ 5/1/52	Ex. Public Liability	Bl 25,000/20,000 excess of 10,000/20,000	CH	422651	Found
WRUSLIP 154 WA	500343	St Anthony Church	38 @ 5/1/75	Ex. Public Liability	Bl 10,000/10,000	CH	801978	Found
WRUSLIP 56 CH	601976	St Anthony Church	36 @ 5/1/72	Ex. Public Liability	Bl 10,000/10,000	CH	426592	Found
WRUSLIP 98 CH	422660	St Denis Church	36 @ 5/1/57	Ex. Public Liability	Bl 10,000/10,000	CH	422740	Found
MISSEACH 67 CH	438789	St Denis Church	36 @ 1/5/70	Ex. Public Liability	Bl 10,000/10,000	CH	422740	Found
WRUSLIP 166 WA	510715	St Denis Church	36 @ 1/5/78	Ex. Public Liability	Bl 10,000/10,000	CH	503754	Found
MISSEACH 57 CH	603794	St Denis Church	36 @ 1/5/73	Ex. Public Liability	Bl 10,000/10,000	CH	428879	Found
WRUSLIP 124 CH	423275	St Edmund's Church	12 @ 1/5/52	Public Liability	Bl 10,000/10,000	NEW	423275	Found
WRUSLIP 124 CH	423276	St Edmund's Church	12 @ 1/5/52	Ex. Public Liability	Bl 10,000/10,000	NEW	423276	Found
WRUSLIP 124 CH	424659	St Edmund's Church	12 @ 1/5/53	Public Liability	Bl 10,000/10,000	CH	423275	Found
MISSEACH 80 CH	422843	St Edmund's Church	12 @ 1/5/55	Ex. Public Liability	Bl 10,000/10,000	CH	425547	Found
WRUSLIP 99 CH	430391	St Edmund's Church	12 @ 1/5/56	Public Liability	Bl 10,000/10,000	CH	422843	Found
WRUSLIP 94 CH	432395	St Edmund's Church	36 @ 1/5/57	Physical Damage	Bl 10,000/10,000	N/A	430391	Found
WRUSLIP 103 CH	438359	St Edmund's Church	36 @ 1/5/70	Physical Damage	Bl 10,000/10,000	CH	423295	Found
WRUSLIP 168 WA	510546	St Edmund's Church	36 @ 1/5/76	Physical Damage	Bl 5,000/25,000	CH	603397	Found
WRUSLIP 57 NM	419074	St Elizabeth's Church	36 @ 1/5/76	Public Liability	Bl 10,000/10,000	CH	422701	Found
WRUSLIP 50 NM	420524	St Elizabeth's Church	36 @ 1/5/76	Ex. Public Liability	Bl 10,000/10,000	CH	419074	Found
WRUSLIP 124 CH	422701	St Elizabeth's Church	12 @ 3/5/52	Public Liability	Bl 10,000/10,000	NEW	420524	Found
WRUSLIP 124 CH	422702	St Elizabeth's Church	12 @ 3/5/52	Ex. Public Liability	Bl 10,000/10,000	CH	420524	Found
WRUSLIP 56 NM	420598	St Elizabeth's Church	12 @ 3/5/53	Public Liability	Bl 10,000/10,000	N/A	420598	Found
WRUSLIP 52 CH	430950	St Elizabeth's Church	12 @ 3/5/53	Ex. Public Liability	Bl 10,000/10,000	CH	422701	Found
WRUSLIP 124 CH	424658	St Elizabeth's Church	12 @ 3/5/53	Physical Damage	Bl 10,000/10,000	CH	422701	Found
WRUSLIP 102 CH	430895	St Elizabeth's Church	36 @ 2/5/55	Physical Damage	Bl 10,000/10,000	NM	430895	Found
WRUSLIP 164 WA	510332	St Elizabeth's Church	36 @ 2/5/75	Physical Damage	Bl 10,000/10,000	CH	510332	Found

MISDECH 67 CH 800181	St Mary of the Assumption	36 @ 1/97/71	CGI	PI 25,000,000.00 to 100,000,000.00 PD 5,000/25,000/25,000 BI 25,000,000.00 excess of 10,000,000.00	NEW	NM 418717	Found
WRLSLIP 58 NM 420137	St Matthews Church	12 @ 25/11/60	Xs Public liability	PI 25,000,000.00 excess of BI 25,000,000.00	NEW	NM 420137	Found
WRLSLIP 124 CH 422628	St Matthews Church	12 @ 25/11/61	Xs Public liability	PI 25,000,000.00 excess of BI 25,000,000.00	NEW	NM 422628	Found
WRLSLIP 124 CH 423893	St Matthews Church	12 @ 25/11/62	Xs Public liability	PI 25,000,000.00 excess of BI 25,000,000.00	NEW	NM 423893	Found
WRLSLIP 124 CH 423894	St Matthews Church	12 @ 25/11/62	Xs Public liability	PI 25,000,000.00 excess of BI 25,000,000.00	NEW	CH 423894	Found
WRLSLIP 124 CH 422627	St Matthew's Church	12 @ 25/11/61	Xs Public liability	PI 10,000,000.00 PD 5,000 10,000,000.00 excess of	NEW	NM 418717	Found
WRLSLIP 60 NM 420536	St Michael's Church	12 @ 18/2/61	Xs Public liability	PI 10,000,000.00 PD 5,000 10,000,000.00 excess of	NEW	NM 418717	Found
WRLSLIP 124 CH 422675	St Michael's Church	12 @ 3/11/52	Public liability	PI 10,000,000.00 PD 5,000 10,000,000.00 excess of	NEW	CH 422675	Found
WRLSLIP 124 CH 422693	St Michael's Church	12 @ 18/2/62	Public liability	PI 10,000,000.00 PD 5,000 10,000,000.00 excess of	NEW	CH 422693	Found
WRLSLIP 124 CH 422694	St Michael's Church	12 @ 18/2/62	Public liability	PI 10,000,000.00 PD 5,000 10,000,000.00 excess of	NEW	CH 422694	Found
WRLSLIP 124 CH 424385	St Michael's Church	12 @ 3/11/53	Public liability	PI 10,000,000.00 PD 5,000 10,000,000.00 excess of	NEW	CH 422676	Found
WRLSLIP 124 CH 424386	St Michael's Church	12 @ 3/11/53	Public liability	PI 10,000,000.00 PD 5,000 10,000,000.00 excess of	NEW	CH 422676	Found
WRLSLIP 124 CH 424452	St Michael's Church	12 @ 18/2/63	Public liability	PI 10,000,000.00 PD 5,000 10,000,000.00 excess of	NEW	CH 422693	Found
WRLSLIP 124 CH 424453	St Michael's Church	12 @ 18/2/63	Public liability	PI 10,000,000.00 PD 5,000 10,000,000.00 excess of	NEW	CH 422694	Found
WRLSLIP 94 CH 432243	St Michael's Church	36 @ 10/2/67	CGI	PI 10,000,000.00 PD 5,000 10,000,000.00 excess of	CH	430513	Found
MISDECH 81 CH 432618	St Michael's Church	36 @ 2/24/67	Umbrella	PI 10,000,000.00 PD 5,000 10,000,000.00 excess of	CH	430513	Found
MISDECH 81 CH 434165	St Michael's Church	12 @ 3/11/53	CGI	PI 10,000,000.00 PD 5,000 10,000,000.00 excess of	CH	430513	Found
WRLSLIP 164 WA 510361	St Michael's Church	36 @ 17/5/75	CGI	PI 10,000,000.00 PD 5,000 10,000,000.00 excess of	CH	710012	Found
WRLSLIP 165 WA 510314	St Michael's Church	36 @ 18/2/66	CGI	PI 10,000,000.00 PD 5,000 10,000,000.00 excess of	CH	503277	Found
WRLSLIP 169 WA 510734	St Michael's Church	12 @ 17/5/76	CGI	PI 10,000,000.00 PD 5,000 10,000,000.00 excess of	WA	51031	Found
WRLSLIP 53 .CH 601185	St Michael's Church	12 @ 3/17/72	CGI	PI 10,000,000.00 PD 5,000 10,000,000.00 excess of	CH	440238	Found
MISDECH 81 CH 603158	St Michael's Church	12 @ 3/17/73	CGI	PI 10,000,000.00 PD 5,000 10,000,000.00 excess of	CH	601815	Found
MISDECH 81 CH 604222	St Michael's Church	12 @ 3/17/74	CGI	PI 10,000,000.00 PD 5,000 10,000,000.00 excess of	CH	601815	Found
WRLSLIP 59 NM 420305	St Paul's R C Church	12 @ 15/1/61	Xs Public liability	PI 25,000,000.00 excess of BI 25,000,000.00	NEW	NM 418556	Found
WRLSLIP 124 CH 422677	St Paul's R C Church	12 @ 15/1/62	Xs Public liability	PI 10,000,000.00 PD 5,000 10,000,000.00 excess of	NEW	CH 422677	Found
WRLSLIP 124 CH 422678	St Paul's R C Church	12 @ 15/1/62	Xs Public liability	PI 10,000,000.00 PD 5,000 10,000,000.00 excess of	NEW	CH 422678	Found
WRLSLIP 124 CH 422735	St Paul's R C Church	12 @ 4/6/62	Public liability	PI 10,000,000.00 PD 5,000 10,000,000.00 excess of	NEW	CH 422735	Found
WRLSLIP 124 CH 422736	St Paul's R C Church	12 @ 4/6/62	Public liability	PI 10,000,000.00 PD 5,000 10,000,000.00 excess of	NEW	CH 422736	Found
WRLSLIP 124 CH 424305	St Paul's R C Church	12 @ 16/1/63	Public liability	PI 25,000,000.00 Xs Public liability	CH	422878	Found
WRLSLIP 69 CH 424305	St Paul's R C Church	12 @ 18/1/63	Public liability	PI 25,000,000.00 Xs Public liability	CH	422878	Found

WRIUSLIP 87 CH 429441	St.Paul's R C Church	36 @ 10/1/2005	DSL	P1 100,000,000.00 Public liability PD 100,000,000.00 Public liability PI 100,000,000.00 Public liability PD 100,000,000.00 Public liability	CH 428999	Found
WRIUSLIP 101 CH 438176	St.Paul's R C Church	35 @ 10/1/2005	DSL	P1 100,000,000.00 Public liability PD 100,000,000.00 Public liability PI 100,000,000.00 Public liability PD 100,000,000.00 Public liability	CH 428441	Found
WRIUSLIP 170 WA 510594	St.Paul's R C Church	36 @ 10/1/2005	DSL	P1 100,000,000.00 Public liability PD 100,000,000.00 Public liability PI 100,000,000.00 Public liability PD 100,000,000.00 Public liability	CH 601468	Found
WRIUSLIP 153 WA 510176	St.Paul's R C Church	38 @ 14/6/2005	DSL	P1 100,000,000.00 Public liability PD 100,000,000.00 Public liability PI 100,000,000.00 Public liability PD 100,000,000.00 Public liability	CH 601467	Found
MISRECH 66 CH 501168	St.Paul's R C Church	35 @ 11/07/2005	DSL	P1 100,000,000.00 Public liability PD 100,000,000.00 Public liability PI 100,000,000.00 Public liability PD 100,000,000.00 Public liability	CH 435178	Found
MISRECH 65 CH 501467	St.Paul's R C Church	35 @ 14/6/2005	DSL	P1 100,000,000.00 Public liability PD 100,000,000.00 Public liability PI 100,000,000.00 Public liability PD 100,000,000.00 Public liability	CH 428999	Found
WRIUSLIP 57 NM 419145	St.Peter's Cathedral	12 @ 12/2/2005	Xs DSL	Xs Public liability	CH 419145	Found
WRIUSLIP 60 NM 420524	St.Peter's Cathedral	12 @ 12/2/2005	Xs DSL	Xs Public liability	CH 420524	Found
WRIUSLIP 124 CH 424430	St.Peter's Cathedral	12 @ 12/2/2005	Xs DSL	Xs Public liability	CH 424430	Found
WRIUSLIP 124 CH 422591	St.Peter's Cathedral	12 @ 12/2/2005	Xs DSL	Xs Public liability	CH 422591	Found
WRIUSLIP 124 CH 422692	St.Peter's Cathedral	12 @ 12/2/2005	Xs DSL	Xs Public liability	CH 422692	Found
WRIUSLIP 124 CH 424431	St.Peter's Cathedral	12 @ 12/2/2005	Xs DSL	Xs Public liability	CH 424431	Found
MISRECH 67 CH 430187	St.Peter's Cathedral	35 @ 12/2/2005	DSL	P1 25,000,000.00 Public liability 5,000,000.00 Public liability PI 25,000,000.00 Public liability 5,000,000.00 Public liability	CH 430187	Found
WRIUSLIP 57 CH 430187	St.Peter's Cathedral	35 @ 12/2/2005	DSL	P1 25,000,000.00 Public liability 5,000,000.00 Public liability PI 25,000,000.00 Public liability 5,000,000.00 Public liability	CH 430187	Found
MISRECH 67 CH 435325	St.Peter's Cathedral	35 @ 12/2/2005	DSL	P1 25,000,000.00 Public liability 5,000,000.00 Public liability PI 25,000,000.00 Public liability 5,000,000.00 Public liability	CH 435325	Found
WRIUSLIP 170 WA 510128	St.Peter's Cathedral	35 @ 12/2/2005	DSL	P1 25,000,000.00 Public liability 5,000,000.00 Public liability PI 25,000,000.00 Public liability 5,000,000.00 Public liability	CH 435325	Found
MISRECH 67 CH 601326	St.Peter's Cathedral	35 @ 12/2/2005	DSL	P1 25,000,000.00 Public liability 5,000,000.00 Public liability PI 25,000,000.00 Public liability 5,000,000.00 Public liability	CH 435325	Found
WRIUSLIP 60 NM 420445	St.Peter's Church	12 @ 22/1/1982	Xs DSL	Xs Public liability	CH 420445	Found
WRIUSLIP 124 CH 422531	St.Peter's Church	12 @ 22/1/1982	Xs DSL	Xs Public liability	CH 422531	Found
WRIUSLIP 124 CH 422532	St.Peter's Church	12 @ 22/1/1982	Xs DSL	Xs Public liability	CH 422532	Found
WRIUSLIP 57 CH 423383	St.Peter's Church	3 @ 19/6/2005	DSL	P1 100,000,000.00 Public liability 10,000,000.00 Public liability PI 100,000,000.00 Public liability 10,000,000.00 Public liability	CH 423383	Found
WRIUSLIP 124 CH 424272	St.Peter's Church	12 @ 22/1/1982	Xs DSL	Xs Public liability	CH 424272	Found
WRIUSLIP 124 CH 424273	St.Peter's Church	12 @ 22/1/1982	Xs DSL	Xs Public liability	CH 424273	Found
WRIUSLIP 84 CH 428434	St.Peter's Church	12 @ 22/1/1982	Xs DSL	Xs Public liability	CH 428434	Found
WRIUSLIP 86 CH 428873	St.Peter's Church	35 @ 15/6/2005	DSL	P1 100,000,000.00 Public liability 10,000,000.00 Public liability PI 100,000,000.00 Public liability 10,000,000.00 Public liability	CH 428873	Found
WRIUSLIP 88 CH 430258	St.Peter's Church	12 @ 22/1/1982	Xs DSL	Xs Public liability	CH 430258	Found

WRUSLIP 93 CH 43124	St Peter's Church	12 @ 221/155	XG, GL	100,000,000.00 Excess of 400,000,000.00	CH	430268	Found
WRUSLIP 94 CH 432237	St Peter's Church	36 @ 12/2/57	CG, L	PD 100,000,000.00 PD 100,000,000.00 excess 1,000,000.00 premium	CH	432164	Found
WRUSLIP 95 CH 432980	St Peter's Church	36 @ 12/2/57	CG, L	PI 100,000,000.00 PD 50,000,000.00 premium	CH	428973	Found
WRUSLIP 99 CH 434768	St Peter's Church	36 @ 15/8/68	CG, L	PI 100,000,000.00 PD 50,000,000.00 premium	CH	432237	Found
WRUSLIP 104 CH 435370	St Peter's Church	36 @ 12/2/70	CG, L	PI 25,000,000.00 PD 5,000,000.00 premium	CH	432237	Found
WRUSLIP 165 WA 5/10/50	St Peter's Church	36 @ 12/2/76	CG, L	PI: CG, L 300,000.00 excess PD: 100,000.00 a. racecourse	CH	503168	Found
WRUSLIP 51 CH 5/20/66	St Peter's Church	36 @ 15/8/71	CG, L	PI 100,000,000.00 PD 50,000,000.00 premium	CH	434766	Found
WRSEACH 65 CH 6/14/50	St Peter's Church	36 @ 15/8/74	CG, L	PI 100,000,000.00 PD 50,000,000.00 premium	CH	500068	Found
WRUSLIP 50 NM 4/20/72	The Bishop of Wilmington	12 @ 19/5/51	Xg, Public liability	PI 25,000,000.00 10,000,000.00 premium	NM	478877	Found
WRUSLIP 124 CH 4/22/52	The Bishop of Wilmington	12 @ 25/11/51	Xg, Public liability	PI 25,000,000.00 excess of 10,000,000.00	NM	478877	Found
WRUSLIP 124 CH 4/22/52	The Bishop of Wilmington	12 @ 23/11/51	Xg, Public liability	PI 10,000,000.00 PI 5,000,000.00 excess of 10,000,000.00	NM	478877	Found
WRUSLIP 124 CH 4/22/53	The Bishop of Wilmington	12 @ 23/11/52	Xg, Public liability	PI 10,000,000.00 PI 5,000,000.00 excess of 10,000,000.00	NM	478877	Found
WRUSLIP 124 CH 4/23/54	The Bishop of Wilmington	12 @ 28/11/52	Xg, Public liability	PI 25,000,000.00 PI 10,000,000.00 excess of 10,000,000.00	NM	478877	Found
WRUSLIP 81 CH 4/27/21	The Bishop of Wilmington	12 @ 28/11/54	Physical Damage Physical Damage CG, L	Physical Damage only Physical Damage only PI 10,000,000.00 PI 5,000,000.00 excess of 25,000	N/A N/A CH	428241	Found Found Found
WRUSLIP 82 NM 4/27/21	The Bishop of Wilmington	36 @ 22/10/54	CG, L	PI 5,000,000.00 PI 10,000,000.00 PI 5,000,000.00 excess of 25,000	NM	427221	Found
WRUSLIP 88 CH 4/28/170	The Bishop of Wilmington	36 @ 28/9/65	CG, L	PI 5,000,000.00 PI 10,000,000.00 PI 5,000,000.00 excess of 25,000	NM	428251	Found
WRUSLIP 87 CH 4/29/395	The Bishop of Wilmington	36 @ 22/10/65	CG, L	PI 5,000,000.00 PI 10,000,000.00 PI 5,000,000.00 excess of 25,000	NM	427221	Found
WRUSLIP 87 CH 4/29/395	The Bishop of Wilmington	36 @ 26/10/65	CG, L	PI 5,000,000.00 PI 10,000,000.00 PI 5,000,000.00 excess of 25,000	NM	428251	Found
WRUSLIP 89 CH 4/30/55	The Bishop of Wilmington	36 @ 19/5/65	CG, L	PI 10,000,000.00 PI 5,000,000.00 excess of 25,000	CH	428816	Found
WRUSLIP 80 CH 4/30/60	The Bishop of Wilmington	38 @ 23/5/66	CG, L	PI 10,000,000.00 PI 5,000,000.00 excess of 25,000	CH	429170	Found
WRUSLIP 80 CH 4/30/60	The Bishop of Wilmington	12 @ 5/1/67	CG, L	PI 5,000,000.00 PI 10,000,000.00 PI 5,000,000.00 excess of 25,000	CH	432943	Found
WRUSLIP 95 CH 4/32/84	The Bishop of Wilmington	36 @ 25/5/68	CG, L	PI 5,000,000.00 PI 10,000,000.00 PI 5,000,000.00 excess of 25,000	CH	432944	Found
WRUSLIP 99 CH 4/34/83	The Bishop of Wilmington	36 @ 25/5/68	CG, L	PI 5,000,000.00 PI 10,000,000.00 PI 5,000,000.00 excess of 25,000	CH	429368	Found
WRUSLIP 99 CH 4/34/84	The Bishop of Wilmington	12 @ 17/6/68	CG, L	PI 5,000,000.00 PI 10,000,000.00 PI 5,000,000.00 excess of 25,000	CH	429368	Found
WRUSLIP 101 CH 4/35/180	The Bishop of Wilmington	36 @ 25/11/69	CG, L	PI 5,000,000.00 PI 10,000,000.00 PI 5,000,000.00 excess of 25,000	CH	429368	Found

WRUSLIP 101 CH 435182	The Bishop of Wilmington	36 @ 22/1/69	DSL	PI-5,000/25,000/25,000 PD-10,000/25,000/25,000	NM	429355	Found
MIS/EXCH 65 CH 430565	The Bishop of Wilmington	36 @ 23/6/69	DSL	PI-5,000/25,000/25,000 PD-5,000/25,000/25,000	CH	430565	Found
WRUSLIP 102 CH 438890	The Bishop of Wilmington	12 @ 17/9/69	DSL	PI-5,000/25,000/25,000 PD-5,000/25,000/25,000	CH	434824	Found
WRUSLIP 104 CH 438762	The Bishop of Wilmington	12 @ 17/9/70	DSL	PI-5,000/25,000/25,000 PD-5,000/25,000/25,000	CH	438800	Found
WRUSLIP 170 WA 510085	The Bishop of Wilmington	38 @ 22/1/75	DSL	PI-10,000/25,000/25,000 PD-10,000/25,000/25,000	CH	801178	Found
WRUSLIP 163 WA 510217	The Bishop of Wilmington	36 @ 23/5/75	DSL	PI-10,000/25,000/25,000 PD-5,000/25,000/25,000	CH	801689	Found
WRUSLIP 166 WA 510582	The Bishop of Wilmington	36 @ 22/4/76	DSL	PI-10,000/25,000/25,000 PD-5,000/25,000/25,000	CH	803518	Found
WRUSLIP 52 CH 500153	The Bishop of Wilmington	12 @ 17/9/71	DSL	PI-5,000/25,000/25,000 PD-6,000/25,000/25,000	CH	430762	Found
MIS/EXCH 66 CH 500191	The Bishop of Wilmington	36 @ 25/9/71	DSL	PI-10,000/25,000/25,000 PD-5,000/25,000/25,000	CH	428241	Found
MIS/EXCH 65 CH 501168	The Bishop of Wilmington	36 @ 10/1/72	DSL	PI-10,000/25,000/25,000 PD-5,000/25,000/25,000	CH	430168	Found
WRUSLIP 53 CH 501178	The Bishop of Wilmington	36 @ 22/1/72	DSL	PI-10,000/25,000/25,000 PD-10,000/25,000/25,000	CH	438182	Found
MIS/EXCH 65 CH 501559	The Bishop of Wilmington	36 @ 23/5/72	DSL	PI-10,000/25,000/25,000 PD-5,000/25,000/25,000	CH	435565	Found
WRUSLIP 56 CH 501682	The Bishop of Wilmington	12 @ 17/9/72	DSL	PI-5,000/25,000/25,000	CH	500153	Found

WD Church Property Slips

Slip No.	Insured	State	Coverage	USD Limit	Period
710022	Church of the Holy Spirit, Newcastle	DE	Institutional Property / CGL	1,025m	36 m 08/09/74
CH603383	Church of the Immaculate Heart of Mary, Wilmington	DE	Institutional Property / CGL	CGL 100k	36 m 26/03/73
CH436555	The Most Reverend Bishop of Wilmington / Our Lady of Lourdes	DE	Institutional Property / CGL	CGL 100k	36 m 23/05/69
CH601568	The Most Reverend Bishop of Wilmington / Our Lady of Lourdes	DE	Institutional Property / CGL	CGL 100k	36 m 23/05/72
CH603660	The Most Reverend Bishop of Wilmington / St. Matthews	DE	Institutional Property / CGL	CGL 100k	36 m 19/06/73
CH600191	The Most Reverend Bishop of Wilmington / St. Matthews	DE	Institutional Property / CGL	CGL 100k	36 m 28/09/71
710028	The Most Reverend Bishop of Wilmington / St. Matthews	DE	Institutional Property / CGL	CGL 100k	36 m 26/09/74
710012	The Most Reverend Bishop of Wilmington / St. Michaels	DE	Institutional Property / CGL	CGL 100k	36 m 17/09/74
CH601326	The Most Reverend Archbishop of Wilmington / St. Peter's Cathedral	DE	Institutional Property / CGL	CGL 25k	36 m 12/02/72
CH428893	St. Edmund's Roman Catholic Church	DE	CGL	100k	12 m 16/03/65
CH600178	St. Hedwig's RC Church, Wilmington	DE	Institutional Property / CGL	CGL 100k	36 m 21/08/71
CH430378	St. Joseph's on the Brandywine, Henry Clay	DE	Institutional Property (No CGL)	804k	12 m 15/03/88
710024	St. Mary of the Assumption, Hockessin	DE	Institutional Property / CGL	769k	36 m 01/09/74
CH424305	St. Paul's RC Church, Delaware	DE	Excess Public Liability	10k	12 m 16/01/63
CH604570	St. Peters, Newcastle	DE	Institutional Property / CGL	CGL 100k	36 m 15/08/74

EXHIBIT F

INSURANCE COVERAGE 1977-1994

DIOCESE OF WILMINGTON INSURANCE POLICIES
1977-94

<u>Insurer</u>	<u>Policy Number</u>	<u>Policy Period</u>	<u>Type of Coverage</u>	<u>Limits of Coverage</u>
Certain Underwriters at Lloyd's, London	510984WA	7/1/77-7/1/80	Comprehensive General Liability (CGL)	\$500,000/occurrence & annual aggregate
Adriatic	EL-1971	7/1/77-7/1/78	Excess Liability	\$500,000 Combined Single Limit (CSL) ¹ Excess of \$500,000
CNA	85-01-13	7/1/79-7/1/80	Excess Liability	\$500,000 CSL ² Excess of \$500,000
Fireman's Fund	XLB-1420608	1/17/80-7/1/80	Excess Liability	\$3,000,000 Excess of \$1,000,000
Certain Underwriters at Lloyd's, London	511918WA	7/1/80-7/1/83	CGL	\$500,000/occurrence & annual aggregate
Mission ³	M877302	7/1/82-7/1/83	Umbrella Liability	\$10,000,000 Excess of \$500,000
Certain Underwriters at Lloyd's, London	512892WA	7/1/83-7/1/86	CGL	\$500,000/occurrence & annual aggregate
Mission National ⁴	MN027210	7/1/83-7/1/84	Umbrella Liability	\$10,000,000 Excess of \$500,000
Mission National	MN027652	7/1/84-7/1/85	Umbrella Liability	\$10,000,000 Excess of \$500,000
Fireman's Fund	XLX-1686515	7/1/84-7/1/85	Excess Liability	\$5,000,000 Excess of \$10,000,000
Granite State	6485-0429	6/30/85-6/30/86	Umbrella Liability	\$10,000,000 Excess of \$500,000

¹ With respect to all of the umbrella, umbrella excess, and excess liability policies, there may be a dispute regarding whether the stated Limits of Coverage incorporate aggregate limits for Personal Injury Tort Claims.

² This policy has not yet been located.

³ Insurer is insolvent.

⁴ Insurer is insolvent.

Fireman's Fund	XLX-1750591	7/1/85-7/1/86	Excess Liability	\$5,000,000 Excess of \$10,000,000
Certain Underwriters at Lloyd's, London	513849WA	7/1/86-7/1/89	CGL	\$500,000/occurrence & annual aggregate
Insurance Company of the State of Pennsylvania (ICSOP)	UML 4186-4041	6/30/86-6/1/87	Umbrella Liability	\$5,000,000 CSL Excess of \$500,000
First State	EU-001642	7/22/86-6/30/87	Excess Umbrella Liability	\$2,500,000 Excess of \$5,000,000
ICSOP	4486-9146	8/8/86-6/30/87	Excess Umbrella Liability	\$2,500,000 Excess of \$8,000,000
ICSOP	UML 4187-4659	6/30/87-6/30/88	Umbrella Liability	\$5,000,000 CSL Excess of \$500,000
First State	EU-004550	6/30/87-6/30/88	Excess Umbrella Liability	\$5,000,000 Excess of \$5,000,000
ICSOP	UML 4188-4934	7/1/88-7/1/89	Umbrella Liability	\$5,000,000 CSL Excess of \$500,000
First State	EU-004610	7/1/88-7/1/89	Excess Umbrella Liability	\$5,000,000 Excess of \$5,000,000
ICSOP	4488-1278	8/4/88-7/1/89	Excess Umbrella Liability	\$5,000,000 Excess of \$10,000,000
Transamerica	XLX-1317687 ⁵	7/1/88-7/1/89	Excess Liability	\$5,000,000 Excess of \$15,000,000
Certain Underwriters at Lloyd's, London	515347WA	7/1/89-7/1/92	CGL	\$500,000/occurrence & annual aggregate
ICSOP	UML 4189-5601	7/1/89-7/1/90	Umbrella Liability	\$5,000,000 Excess of \$500,000
First State	FL-0000435	7/1/89-7/1/90	Excess Liability	\$10,000,000 Excess of \$5,000,000
Transamerica	XLX-1318666	7/1/89-7/1/90	Excess Liability	\$5,000,000

⁵ This policy has not yet been located.

				Excess of \$15,000,000
National Casualty	UM011250	7/1/90-7/1/91	Umbrella Liability	\$5,000,000 Excess of \$500,000
First State	FL 0000495	7/1/90-7/1/91	Excess Liability	\$10,000,000 Excess of \$5,000,000
Transamerica	XLX-2709526 ⁶	7/1/90-7/1/91	Excess Liability	\$5,000,000 Excess of \$15,000,000
National Casualty	UM011250	7/1/91-7/1/92	Umbrella Liability	\$5,000,000 Excess of \$500,000
First State	FL 0002651	7/1/91-7/1/92	Excess Liability	\$10,000,000 Excess of \$5,000,000
Transamerica	XLX-2710656	7/1/91-7/1/92	Excess Liability	\$5,000,000 Excess of \$15,000,000
Certain Underwriters at Lloyd's, London	517274WA	7/1/92-7/1/95	CGL	\$500,000/occurrence & annual aggregate
National Casualty	UM009866	7/1/92-7/1/93	Umbrella Liability	\$5,000,000 Excess of \$500,000
First State	FL 0002698	7/1/92-7/1/93	Excess Liability	\$10,000,000 Excess of \$5,000,000
Transamerica	XLX-2711809	7/1/92-7/1/93	Excess Liability	\$5,000,000 Excess of \$15,000,000
National Casualty	UM0020811	7/1/93-7/1/94	Umbrella Liability	\$5,000,000 Excess of \$500,000
Nutmeg	YA 0000130	7/1/93-7/1/94	Excess Liability	\$10,000,000 Excess of \$5,000,000
Transamerica	XLX-2711809	7/1/93-7/1/94	Excess Liability	\$5,000,000 Excess of \$15,000,000

⁶ This policy has not yet been located.

EXHIBIT G

CLAIMS-MADE INSURANCE COVERAGE 2007-2009

DIOCESE OF WILMINGTON INSURANCE POLICIES
Claims-Made Coverage 2007-2009

<u>Insurer</u>	<u>Policy Number</u>	<u>Policy Period</u>	<u>Type of Coverage</u>	<u>Limits of Coverage</u>
Certain Underwriters at Lloyd's, London	B0901/LU0737828	7/1/07-7/1/08	Sexual Misconduct Liability	\$1,000,000/claim (incl. Defense Costs)
Certain Underwriters at Lloyd's, London	180/F080128	7/1/08-7/1/09	Sexual Misconduct Liability	\$1,000,000/claim (incl. Defense Costs)
Certain Underwriters at Lloyd's, London	180/F090128	7/1/09-7/1/10	Sexual Misconduct Liability	\$1,000,000/claim (incl. Defense Costs)
			Employee Benefits Administration and Fiduciary Liability	\$1,000,000/claim (incl. Defense Costs)