

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

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|---|--|
| In re:                                  | ) Chapter 11                                       |
|   | )  |
| CATHOLIC DIOCESE OF WILMINGTON,<br>INC. | ) Case No. 09-13560 (CSS)                          |
|   | )  |
|   | ) <b>Hearing Date: July 8, 2011, at 10:00 a.m.</b> |
| Debtor.                                 | )  |
|   | ) <b>Related to Dkt. No. 1321</b>                  |
|   | )  |

**CERTAIN UNDERWRITERS AT LLOYD’S, LONDON’S OPPOSITION TO  
CONFIRMATION OF SECOND AMENDED CHAPTER 11 PLAN OF  
REORGANIZATION OF CATHOLIC DIOCESE OF WILMINGTON, INC.**

Certain Underwriters at Lloyd’s, London (“Underwriters”) hereby oppose confirmation of the Second Amended Chapter 11 Plan of Reorganization of Catholic Diocese of Wilmington, Inc. (“Plan”), and in support thereof, respectfully state as follows:

Underwriters object to § 5.1(b) of the Plan. Section 5.1(b) sets forth, generally, the contributions by settling insurers pursuant to their settlement agreements. However, the final sentence states: “As additional consideration for, and expressly conditioned upon, clauses (i)-(iii) of the preceding sentence, and subject to the occurrence of the Effective Date, each of the Settling Insurers shall assign to the Settlement Trust all right, title and interest in and to any and all Order/Perpetrator Indemnification Claims.”

That sentence does not reflect the agreement between Underwriters, the Debtor and the Non-Debtor Catholic Entities. Underwriters have not agreed to make such assignment, but will continue to attempt to resolve this issue with the Debtor. Such requirement is unfair, inequitable, outside the scope of the agreement, and not permitted under either the Bankruptcy Code or applicable state law.

WHEREFORE, Underwriters respectfully requests that the Court deny confirmation of the Plan.

Dated: June 30, 2011

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CATHOLIC DIOCESE OF WILMINGTON, ) Case No. 09-13560 (CSS)  
INC. )  
)  
Debtor. )

**CERTIFICATE OF SERVICE**

I, Richard W. Riley, hereby certify that on this 30<sup>th</sup> day of June 2011, I caused a true and correct copy of **Certain Underwriters At Lloyd’s, London’s Opposition To Confirmation Of Second Amended Chapter 11 Plan Of Reorganization Of Catholic Diocese Of Wilmington, Inc.** to be served upon on the attached service list via electronic mail.

Dated: June 30, 2011  
Wilmington, Delaware

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