

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Attorneys for Interstate Fire and Casualty Company

In re:

The Diocese of Camden, New Jersey,

Debtor.

Chapter: 11

Case No.: 20-21257 (JNP)

Honorable Jerrold N. Poslusny

**INTERSTATE FIRE & CASUALTY COMPANY'S JOINDER IN
CENTURY'S OBJECTION TO THE TERMS OF PROPOSED BAR DATE ORDER**

Interstate Fire & Casualty Company ("Interstate"), a party in interest in the above-captioned case, hereby files this limited opposition to the *Diocese's Motion re: (i) establishing deadlines to file proofs of claim against the Diocese, including but not limited to all claims of setoff or recoupment and claims arising under Section 503(b)(9) of the Bankruptcy Code; (ii) approving the form and manner of notice of the Bar Dates; (iii) approving the proposed forms to be used for filing proofs of claim; (iv) approving procedures for maintaining the confidentiality of certain claims; (v) authorizing the Diocese to publish notice of the Bar Dates; and (vi) granting related relief* ("Motion") (Oct. 14, 2020) (Docket No. 74).

1. The Motion seeks to establish deadlines for filing proofs of claim, to approve the form and manner of notice, to approve the form of proofs of claim, to approve confidentiality procedures, and other relief.

2. Interstate joins, in part, in the Objection to the Motion filed by Century (Docket No. 337) (“Century’s Objection”).

3. Specifically, Interstate agrees with, and joins in, the argument in part I of Century’s Objection to the effect that this Court has the authority to establish a bar date that is earlier than the date established by the “reviver” statute and that a later bar date will result in a later resolution of this case.

4. Further, Interstate agrees with, and joins in, part II of Century’s Objection. Interstate respectfully submits that the abuse claimants, themselves, must be required to sign the proofs of claim.

5. Further, Interstate agrees with, and joins in, part III of Century’s Objection regarding the overbreadth of the confidentiality procedures proposed by the Diocese.

6. Finally, Interstate agrees with, and joins in, part IV of Century’s Objection regarding the need for detailed questions in the proofs of claim form. The insurers will be asked by the Debtor and the claimants to provide the lion’s share of any settlement in this matter. In order to respond to this request, the insurers will need substantial information about the claims, including the grounds on which the Debtor is allegedly liable for those claims. Interstate’s significant experience in cases of this type leads it to believe that detailed claim forms are an efficient way to provide much of the required information.¹

¹ Interstate does not waive its right to seek discovery into any of the claims.

WHEREFORE, for the foregoing reasons, Interstate opposes the Motion on this limited basis.

Dated: January 14, 2021

Respectfully submitted,

RIVKIN RADLER LLP

By: /s/ Siobhain P. Minarovich

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