**United States Bankruptcy Court** 

District Of New Jersey

Caption In Compliance With D.N.J. LBR 9004-1

DUANE MORRIS LLP

A Delaware Limited Liability Partnership

Sommer L. Ross, Esq.

NJ Bar No. 004112005

1940 Route 70 East, Suite 100

Cherry Hill, NJ 08003-2171

Telephone: 856.874.4200

Email: SLRoss@duanemorris.com

Counsel for Certain Underwriters at Lloyd's, London and Certain London Market Companies

In Re:

Chapter 11

THE DIOCESE OF CAMDEN, NEW JERSEY,

Case No. 20-21257 (JNP)

Debtor.

## LONDON MARKET INSURERS' JOINDER TO INTERSTATE FIRE AND CASUALTY COMPANY'S AND CENTURY INDEMNITY COMPANY'S JOINT OBJECTION TO THE THIRD MODIFIED EIGHTH AMENDED PLAN OF REORGANIZATION

Certain Underwriters at Lloyd's, London, Catalina Worthing Insurance Ltd f/k/a HFPI (as Part VII transferee of Excess Insurance Company Ltd. and London & Edinburgh Insurance Company Ltd.), RiverStone Insurance (UK) Ltd. (as successor in interest to Terra Nova Insurance Company Ltd.), and Sompo Japan Nipponkoa Insurance Company of Europe Limited (f/k/a The Yasuda Fire & Marine Insurance Company of Europe Ltd.) (collectively "London Market Insurers" or "LMI"), by and through their undersigned attorneys, hereby join in Interstate Fire & Casualty Company's and Century Indemnity Company, as successor to CCI Insurance Company, as successor to Insurance Company, and Illinois

Union Insurance Company's Joint Objection to the Third Modified Eighth Amended Plan of Reorganization filed on March 1, 2024, Doc. 3664.

WHEREFORE, LMI respectfully request that the Court deny confirmation of the Modified Plan, and grant such other and further relief as is just and proper.

Respectfully submitted,

Dated: March 1, 2024

By: /s/ Sommer L. Ross

Sommer L. Ross, Esq. NJ Bar No. 004112005

**Duane Morris LLP** 

1940 Route 70 East, Suite 100 Cherry Hill, NJ 08003-2171 Telephone: 856.874.4200

Email: SLRoss@duanemorris.com

and

Russell W. Roten, Esq. (Admitted *Pro Hac Vice*) Jeff D. Kahane, Esq. (Admitted *Pro Hac Vice*) Andrew E. Mina, Esq. (Admitted *Pro Hac Vice*)

**Duane Morris LLP** 

865 South Figueroa Street, Suite 3100 Los Angeles, CA 90017-5450 Telephone: (213) 689-7400

Facsimile: (213) 402-7079

E-mail: rwroten@duanemorris.com E-mail: jkahane@duanemorris.com E-mail: amina@duanemorris.com

and

Catalina Sugayan, Esq. (Admitted *Pro Hac Vice*) Michael Norton, Esq. (Admitted *Pro Hac Vice*)

Clyde & Co. US LLP

30 S. Wacker Drive, Suite 2600

Chicago, IL 60606

Telephone: (312) 635-7000

E-mail: catalina.sugayan@clydeco.us michael.norton@clydeco.us

Counsel for Certain Underwriters at Lloyd's, London and Certain London Market Companies