

**EXHIBIT B**

**(Disclosure Statement Approval Order)**

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MONTANA

In Re:

Roman Catholic Bishop of Helena, Montana,  
a Montana Religious Corporation Sole,

Debtor-In-Possession

Chapter 11

Case No. 14-60074

**ORDER (A) APPROVING DISCLOSURE STATEMENT, (B) ESTABLISHING  
PROCEDURES FOR SOLICITATION AND TABULATION OF VOTES, AND  
(C) SETTING HEARING ON CONFIRMATION OF JOINT PLAN**

A hearing having been held on January 14, 2015 (the "Hearing"), to consider the motion dated December 12, 2014 (the "Motion")<sup>1</sup> of Roman Catholic Bishop of Helena, Montana (the "Debtor") and the Official Committee of Unsecured Creditors of Roman Catholic Bishop of Helena, Montana (the "Committee") (collectively, the "Proponents") for an Order (i) approving the Disclosure Statement (the "Disclosure Statement"), pursuant to Section 1125 of title 11 of the United States Code (the "Bankruptcy Code"), relating to the Plan filed by the Proponents dated December 12, 2014 (as such Plan may be modified from time to time, the "Plan"), (ii) establishing the procedures for solicitation and tabulation of votes to accept or reject the Plan pursuant to Sections 1125 and 1126 of the Bankruptcy Code and Rules 3017, 3018 and 3020 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and (iii) setting a time and date for the Plan Confirmation Hearing and deadlines for objections and voting, and it appearing from the affidavit of service on file with this Court that proper and timely notice of the Hearing has been given; and it appearing that such notice was adequate and appropriate with respect to all affected parties; and the appearances of all interested parties having been noted in the record of

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<sup>1</sup> Unless otherwise defined herein, all capitalized terms shall have the meanings ascribed to them in the Motion.

the Hearing; and the Proponents having made the conforming additions, changes, corrections and deletions to the Disclosure Statement as necessary to comport with the record of the Disclosure Statement Hearing; and the Proponents having filed such amended and revised Disclosure Statement on the Docket for this case [Docket #410]; and upon the Motion, and all of the proceedings heretofore had before the Court; and the Court having considered the adequacy of the Disclosure Statement and the materials to be transmitted therewith; and after due deliberation and good and sufficient cause appearing therefor, it is hereby

ORDERED, FOUND AND DETERMINED THAT:

1. The Disclosure Statement, as the same may be amended and modified to reflect any modifications that the Proponents determine to be appropriate, which do not materially change the Disclosure Statement or materially affect any rights of a party in interest, be, and it hereby is, approved as containing adequate information within the meaning of Section 1125 of the Bankruptcy Code.

2. The time, place, and date for hearing on confirmation of the Proponents' Joint Plan of Reorganization are as follows:

- a. Date - March 4, March 5, and March 6, 2015;
- b. Place - United States Bankruptcy Court, 6450 N. Mineral Drive, Coeur d'Alene, Idaho;
- c. Time -beginning 9:00 a.m., March 4, 2015, and continuing as needed; and
- d. Voting Deadline and Deadline for Filing Objections of Confirmation of the Joint Plan – February 25, 2015, or 7 days before Confirmation Hearing.

3. A summary timeline for the deadlines and hearings approved in this Order are as follows:

- a. Commencement of Plan Solicitation period/completion of service of Solicitation Packages – no later than January 24, 2015;
- b. Deadline for Rule 3018(a) motions – 10 days before Confirmation Hearing;
- c. Voting Deadline – February 25, 2015, or 7 days before Confirmation Hearing;
- d. Objections to Confirmation – February 25, 2015, or 7 days before Confirmation Hearing; and,
- e. Confirmation Hearing – March 4, 2015 and carrying over to March 5 and March 6, 2015, as necessary.

4. The Balloting Agent shall mail solicitation packages (the “Solicitation Packages”) containing copies of (i) this Disclosure Statement Approval Order, (ii) the Notice of Disclosure Statement Approval and Confirmation Hearing and (iii) the approved form of the Disclosure Statement (together with the Plan annexed thereto as “Exhibit A,” which is filed with the Court at Docket #374) and Ballot, as appropriate. The Solicitation Packages will be mailed no later than January 24, 2015 (the “Solicitation Date”) to (i) the attorneys for the Debtor; (ii) attorneys for the Committee and (iii) the Office of the U. S. Trustee (collectively, the “Notice Parties”), (iv) all persons or entities that filed proofs of claim on or before the date of the Notice of Disclosure Statement Approval and Confirmation Hearing, except to the extent that a claim was paid pursuant to, or expunged by, prior order of the Bankruptcy Court, (v) all persons or entities listed in the Debtor’s Schedules of Assets and Liabilities or any amendment(s) thereof (the “Schedules”), as holding liquidated, noncontingent, and undisputed claims, in an amount greater than zero<sup>2</sup>, (vi) all parties to executory contracts listed in the Schedules, (vii) the IRS, (viii) any entity that has filed with the Court a notice of transfer of a claim under Bankruptcy Rule 3001(e)

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<sup>2</sup> Bankruptcy Rule 3003(c)(2) provides in relevant part that “any creditor . . . whose claim or interest is not scheduled or scheduled as disputed, contingent, or unliquidated . . . who fails to [timely file a proof of claim] shall not be treated as a creditor with respect to such claim for the purposes of voting and distribution.” Fed. R. Bankr. P. 3003(c)(2).

prior to the date of the Notice of Disclosure Statement Approval, (ix) any other known holders of claims against the Debtor, (x) state and local taxing authorities, (xi) the Attorney General for Montana, and (xii) the Center for Medicare and Medicaid Services; with the exception that the Balloting Agent is excused from mailing to entities from which Notices of the Disclosure Statement Hearing were returned as undeliverable by the United States Postal Service, unless the Balloting Agent is provided with accurate addresses for such entities on or before January 19, 2015.

5. In the case of Class 4 Claimants, (a) the Balloting Agent may serve one (1) Solicitation Package to counsel of record for all of such counsel's clients, provided that each counsel will receive a separate Ballot for each client, and (b) the Balloting Agent shall serve a Class 4 Tort Claim Ballot and Releases (with Province Channeled Claim) on Province Claimants (as described in Exhibit J of the Plan) and a Class 4 Tort Claim Ballot and Releases on all other Tort Claimants. On request, the Balloting Agent will provide counsel with additional Solicitation Packages.

6. In addition, pursuant to Bankruptcy Rule 3017(c), the form ballots (the "Ballots," and individually, a "Ballot") (substantially in the forms annexed hereto as **Exhibit A**) be, and they hereby are, approved and shall be distributed, along with a postage prepaid return envelope addressed to the Balloting Agent to the known holders of claims in those classes which are entitled to accept or reject the Plan.

7. In order to be counted as a vote to accept or reject the Plan, a Ballot must be properly executed, completed and delivered to the Balloting Agent (i) by mail in a return

envelope provided with each Ballot, (ii) by overnight courier or (iii) by personal delivery so that they are actually received by the Balloting Agent no later than 5:00 p.m. P.S.T. on February 25, 2015 (the "Voting Deadline").

8. Solely for the purpose of voting to accept or reject the Plan and not for the purpose of allowance of or distribution on account of a claim, and without prejudice to the rights of the Proponents in any other context, each claim within a class of claims entitled to vote to accept or reject the Plan be, and it hereby is, temporarily allowed in an amount equal to the amount of such claim as set forth in a timely filed proof of claim or, if no proof of claim was filed, the amount of such claim as set forth in the Schedules; provided, however, that:

- (a) If a claim is deemed allowed in accordance with the Plan, such claim is allowed for voting purposes in the deemed allowed amount set forth in the Plan;
- (b) If a claim has been estimated or otherwise allowed for voting purposes by order of the Court, such claim is temporarily allowed in the amount so estimated or allowed by the Court for voting purposes only, and not for purposes of allowance or distribution;
- (c) If a claim is listed in the Schedules at zero or as contingent, unliquidated, or disputed and/or a proof of claim was not (i) filed by the applicable bar date for the filing of proofs of claim established by the Court or (ii) deemed timely filed by an Order of the Court prior to the Voting Deadline, unless the Debtor has consented in writing, such claim shall be disallowed for voting purposes and for purposes of allowance and distribution pursuant to Bankruptcy Rule 3003(c);
- (d) If the Debtor has served an objection to a claim at least ten (10) days before the Voting Deadline, the creditor whose claim is the subject of the objection shall receive a Ballot pre-printed with the amount sought by the Debtor in such objection, and;
- (e) As to Class 4 Claims, each Claim will be temporarily allowed for voting purposes only in the amount of one dollar (\$1.00).

9. In accordance with paragraph 8(e), this temporary allowance is solely for purposes of voting to accept or reject the Plan and not for the purpose of the allowance of, or

distribution on account of, a claim, and without prejudice to the rights of the Proponents or Non-Settling Insurers in any other context. This temporary allowance is not intended to affect, impair or diminish the Tort Claimants' rights against the Reorganized Debtor, Co-defendants or Non-Settling Insurers.

10. Any creditor that challenges the allowance of its claim for voting purposes pursuant to the foregoing paragraph of this Order be, and hereby is, directed to serve upon (a) attorneys for the Debtor, Elsaesser Jarzabek Anderson Elliott & Macdonald, Chtd., J. Ford Elsaesser, Esq. and Bruce A. Anderson, Esq., 320 East Neider Avenue, Suite 102, Coeur d'Alene, ID 83815 and; (b) attorneys for the Committee, Pachulski Stang Ziehl & Jones LLP, Pachulski Stang Ziehl & Jones LLP, 10100 Santa Monica Boulevard, 13<sup>th</sup> Floor, Los Angeles, California 90067, Attn: James I. Stang, Esq. and 780 Third Avenue, 34<sup>th</sup> Floor, New York, New York 10017, Attn: Ilan D. Scharf, Esq., (collectively, the "Notice Parties"), and file with the Court (with a copy to Chambers) a motion for an Order pursuant to Bankruptcy Rule 3018(a) temporarily allowing such claim for purposes of voting to accept or reject the Plan on or before the twenty first day before the date set for the hearing on the confirmation of Debtor's Plan. In respect of any such motion timely filed with the Court, the Ballot in question shall not be counted unless temporarily allowed by the Court for voting purposes, after notice and a hearing.

11. The Debtor is not required to provide Ballots to the holders of claims in Class 1, Class 2, Class 3, Class 7, Class 8, and Class 9. The members of the foregoing Classes shall receive a Notice of Non-Voting Status (substantially in the forms annexed to the Motion as

“**Exhibit D**”), along with copies of this Order and the Notice of Disclosure Statement Approval and Confirmation Hearing.

12. The Balloting Agent shall utilize the following procedures in mailing Solicitation Packages:

- (a) Creditors in any given class who hold multiple or duplicate claims against the Debtor in a single class shall receive only one (1) Solicitation Package and one (1) Ballot;
- (b) Creditors who hold multiple or duplicate claims against the Debtor in multiple classes shall receive only one (1) Solicitation Package and one (1) Ballot;
- (c) Creditors who have filed proofs of claim on or before Claims Bar Date and who are also listed in the Schedules shall receive only one (1) Solicitation Package and one (1) Ballot;
- (d) Creditors who have provided more than one address shall receive one (1) Solicitation Package and one (1) Ballot for each address provided, and;
- (e) In the case of Class 4 Claimants, the Balloting Agent shall send that Ballot to counsel of record for all of such counsel’s clients. Counsel of record will be ascertained based on the creditor’s proof of claim or a notice of appearance filed in the Cases.

13. In tabulating the Ballots, the following additional procedures shall be utilized: (a) any Ballot that is properly completed, executed and timely returned to the Balloting Agent but does not indicate an acceptance or rejection of the Plan, or that indicates both an acceptance and rejection of the Plan, shall be deemed a vote to accept the Plan; (b) if no votes to accept or reject the Plan are received with respect to a particular class, such class shall be deemed to have voted to accept the Plan; (c) if a creditor or interest holder manually changes the amount of its claim on the Ballot he or she receives, the Ballot shall be counted, for voting purposes only, in the pre-printed number or amount; (d) if a creditor or interest holder, or any person acting on behalf of a creditor or interest holder under applicable law, casts more than one Ballot voting the same claim



or interest before the Voting Deadline, the latest dated Ballot received before the Voting Deadline shall be deemed to reflect the voter's intent and thus to supersede any prior Ballots; (e) creditors and interest holders must vote all of their claims or interests within a particular class, either to accept or reject the Plan and may not split their votes within a particular class; thus, a Ballot (or a group of Ballots) within a particular class received from a single creditor that partially rejects and partially accepts the Plan shall be deemed to have voted to accept the Plan; and (f) the person signing the creditor's proof of claim may complete and sign the creditor's Ballot. Late Ballots may be used to tabulate the acceptance threshold under the Province Settlement (as defined in the Plan), the Province Alternate Settlement (as defined in the Plan), or the terms of the settlement described in the Term Sheet (as defined in the Plan) even if such Ballots are not used to tabulate acceptance or rejection of the Plan. The releases, certifications and consents in the Class 4 Ballots shall be and shall remain valid, binding and enforceable upon delivery to the Province pursuant to and in accordance with the Province Escrow Agreement notwithstanding that such Ballots are late, provided that the Province Settlement, the Province Alternate Settlement or the settlement described in the Term Sheet is approved by the Bankruptcy Court or another court of competent jurisdiction.

14. The following Ballots shall not be counted or considered for any purpose in determining whether the Plan has been accepted or rejected:

- (a) any Ballot received after the Voting Deadline unless the Debtor shall have granted in writing an extension of the Voting Deadline with respect to such Ballot;
- (b) any Ballot that is illegible or contains insufficient information to permit the identification of the creditor or interest holder;

- (c) any Ballot cast by a person or entity that does not hold a claim in a class that is entitled to vote to accept or reject the Plan;
- (d) any Ballot cast for a claim scheduled in the amount of \$0, or as unliquidated, contingent, or disputed for which no proof of claim was timely filed;
- (e) any unsigned Ballot, and;
- (f) any Ballot transmitted to the Balloting Agent by facsimile, email or other electronic means.

15. In addition to the Debtor's right to solicit acceptance of the Plan, the Debtor shall be permitted to contact creditors and interest holders in an attempt to cure the deficiencies specified herein.

16. Subject to paragraph 13 above, for purposes of determining whether the numerosity and claim or interest amount requirements of Sections 1126(c) and 1126(d) of the Bankruptcy Code have been satisfied, the Debtor shall tabulate only those Ballots cast by the Voting Deadline.

17. Mailing the Solicitation Packages in accordance with this Order constitutes adequate notice of the Confirmation Hearing and the Voting Deadline under Bankruptcy Rule 3017(d).

18. The Debtor is authorized and empowered to take such steps and perform such acts as may be necessary to implement and effectuate this Order.

19. Montana Local Rule 3017-1 is hereby waived.

Dated: \_\_\_\_\_, 2015

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UNITED STATES BANKRUPTCY JUDGE

**EXHIBIT A**

**(Ballots)**

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MONTANA

In Re:

Roman Catholic Bishop of Helena, Montana,  
a Montana Religious Corporation Sole,

Debtor-In-Possession.

Chapter 11

Case No. 14-60074

**CLASS 4  
TORT CLAIM  
BALLOT AND RELEASES  
(With Province Channeled Claim)**

- **BALLOT FOR ACCEPTING OR REJECTING FIRST AMENDED JOINT PLAN OF REORGANIZATION DATED JANUARY \_\_, 2015 (“Plan”)**

**AND**

- **GENERAL RELEASES OF CLAIMS PURSUANT TO FIRST AMENDED JOINT PLAN OF REORGANIZATION DATED JANUARY \_\_, 2015**

**THIS DOCUMENT HAS THREE PARTS: (1) A BALLOT FOR ACCEPTING OR REJECTING THE PLAN, (2) A GENERAL RELEASE OF CLAIMS AGAINST THE PROTECTED PARTIES (EXCEPT THE PROVINCE), ANY INSURED ENTITIES, AND ANY OF THE SETTLING INSURERS’ REINSURERS AND RETROCESSIONAIRES AND (3) A GENERAL RELEASE OF CLAIMS AGAINST THE PROVINCE.<sup>1</sup>**

**UNDER THE TERMS OF THE PLAN, YOU OR YOUR COUNSEL MUST SIGN AND RETURN THIS BALLOT AND RELEASES IN ORDER TO RECEIVE ANY FUNDS ON ACCOUNT OF YOUR CLAIM.**

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<sup>1</sup> Capitalized terms are defined in the Plan.

**PART 1**  
**BALLOT FOR ACCEPTING OR REJECTING PLAN<sup>2</sup>**

PLEASE READ THE ENTIRE BALLOT BEFORE COMPLETING IT.

By signing this Ballot, I certify under penalty of perjury pursuant to 28 U.S.C. § 1746 that I have been provided access to a copy of the Disclosure Statement, dated January \_\_, 2015, and the exhibits thereto.

By voting to accept the Plan, I expressly accept/represent the following:

- I accept the Province Settlement, if approved by the Bankruptcy Court.
- If the Province Settlement is not approved by the Bankruptcy Court, I accept the Province Alternate Settlement, whether approved by the Bankruptcy Court or in the State Court Litigation.
- If the Bankruptcy Court does not approve the Province Settlement or the Province Alternate Settlement, I accept the Plan without the Province Settlement, the Province Alternate Settlement or the provisions in the Term Sheet.
- **I ACCEPT THAT EXCEPT AS EXPRESSLY PROVIDED IN THE PLAN, NONE OF THE EXCULPATED PARTIES WILL HAVE OR INCUR ANY LIABILITY TO, OR BE SUBJECT TO ANY RIGHT OF ACTION BY, ANY CLAIMANT, ANY OTHER PARTY IN INTEREST, OR ANY OF THEIR RESPECTIVE REPRESENTATIVES, FINANCIAL ADVISORS, OR AFFILIATES, OR ANY OF THEIR SUCCESSORS OR ASSIGNS, FOR ANY ACT OR OMISSION IN OR RELATING TO THIS CASE, INCLUDING THE EXERCISE OF THEIR RESPECTIVE BUSINESS JUDGMENT AND THE PERFORMANCE OF THEIR RESPECTIVE FIDUCIARY OBLIGATIONS, THE PURSUIT OF CONFIRMATION OF THE PLAN, OR THE ADMINISTRATION OF THE PLAN OR THE TRUST, EXCEPT LIABILITY FOR THEIR WILLFUL MISCONDUCT OR GROSS NEGLIGENCE (PROVIDED, HOWEVER, THE DEBTOR AND REORGANIZED DEBTOR WILL BE DISCHARGED FROM ANY SUCH LIABILITY FOR SUCH ACTS OR OMISSIONS OCCURRING PRIOR TO THE EFFECTIVE DATE) AND IN ALL RESPECTS, SUCH PARTIES WILL BE ENTITLED TO REASONABLY RELY UPON THE ADVICE OF COUNSEL WITH RESPECT TO THEIR DUTIES AND RESPONSIBILITIES UNDER THE PLAN OR IN THE CONTEXT OF THE CASE. WITHOUT LIMITING THE GENERALITY OF THE FOREGOING, THE DEBTOR AND ITS MEMBERS, FINANCIAL ADVISORS, AND OTHER PROFESSIONALS SHALL BE ENTITLED TO AND GRANTED THE BENEFITS OF § 1125(E) OF THE BANKRUPTCY CODE. THIS EXCULPATION SHALL NOT APPLY TO THE PROVINCE IF THE BANKRUPTCY COURT DOES NOT APPROVE THE PROVINCE SETTLEMENT OR THE ALTERNATE PROVINCE SETTLEMENT.**
- **I ACCEPT THAT THE SETTLING INSURERS, THE REORGANIZED DEBTOR, THE TRUST, THE TRUSTEE, THE PROVINCE AND PROFESSIONALS EMPLOYED BY THE FOREGOING SHALL NOT HAVE ANY LIABILITY TO ANY ENTITY,**

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<sup>2</sup> This Ballot is for voting purposes only and does not constitute and shall not be deemed a proof of claim or interest or an admission of the validity of a claim or interest.

**INCLUDING ANY GOVERNMENTAL ENTITY OR INSURER, ON ACCOUNT OF PAYMENTS MADE TO A TORT CLAIMANT, INCLUDING ANY LIABILITY UNDER THE MEDICARE SECONDARY PAYER ACT. THIS EXCULPATION SHALL NOT APPLY TO THE PROVINCE IF THE BANKRUPTCY COURT DOES NOT APPROVE THE PROVINCE SETTLEMENT OR THE ALTERNATE PROVINCE SETTLEMENT.**

**YOU OR YOUR COUNSEL MAY COMPLETE THIS BALLOT**

**TO HAVE YOUR VOTE COUNT YOU OR YOUR COUNSEL MUST COMPLETE AND RETURN THIS BALLOT BY 5:00 P.M., MOUNTAIN TIME ON \_\_\_\_\_, 2015.**

The undersigned, a holder of a Class 4 Tort Claim, votes (check one box only):

<input type="checkbox"/> to <b>ACCEPT</b> the Plan	<input type="checkbox"/> to <b>REJECT</b> the Plan
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Amount of Your Claim for Voting Purposes Only: \$1.00

By signing this Ballot, the undersigned makes the certifications herein.

DATED: \_\_\_\_\_, 2015

TO BE COMPLETED BY TORT CLAIMANT, IF APPLICABLE:

\_\_\_\_\_  
Print or Type Name and Claim Number (if known)

\_\_\_\_\_  
Signature of Tort Claimant

\_\_\_\_\_  
Address of Tort Claimant

( ) \_\_\_\_\_  
Telephone Number of Tort Claimant

TO BE COMPLETED BY COUNSEL FOR TORT CLAIMANT, IF APPLICABLE:

**By signing this Ballot and Release, I make the following certifications under penalty of perjury pursuant to 28 U.S.C. § 1746:**

- I have explained the terms and effects of the Plan and this Ballot to the Tort Claimant listed below and have full and express authority to: (1) vote to accept or reject the Plan on behalf of the

Tort Claimant listed on this Ballot, and (2) sign this Ballot on behalf of the Tort Claimant listed on this Ballot.

\_\_\_\_\_  
Print or Type Name of Tort Claimant and Claim Number  
(if known)

\_\_\_\_\_  
Print or Type Name of Counsel for Tort Claimant

\_\_\_\_\_  
Signature of Counsel Tort Claimant

\_\_\_\_\_  
Address of Counsel for Tort Claimant

( ) \_\_\_\_\_  
Telephone Number of Counsel for Tort Claimant

Return this Ballot to **ROMAN CATHOLIC BISHOP OF HELENA, MONTANA., C/O OMNI ACQUISITION CORP., 5955 DESOTO AVE., STE. 100, WOODLAND HILLS, CA 91367.** If your Ballot is NOT RECEIVED by 5:00 p.m., Mountain Time on \_\_\_\_\_ 2015, it will not be counted.

**PART 2**  
**GENERAL RELEASE OF CLAIMS AGAINST PROTECTED PARTIES**  
**(EXCEPT THE PROVINCE)**

I hereby fully release and forever discharge any and all Claims against any of the Protected Parties (except the Province), any Insured Entity, and any of the Settling Insurers' reinsurers or retrocessionaires that, directly or indirectly, relate to the Tort Claims, the injuries or damages alleged by any of the Tort Claimants, or the Policies, whether known or unknown, suspected or unsuspected, in law or equity. This release shall be binding upon my successors, heirs, agents and representatives.

I represent and warrant that I have not assigned or otherwise transferred any interest in such Claims.

This General Release of Claims shall be effective as of the Effective Date of the Plan.

Capitalized terms are defined in Section II of the Plan.

DATED: \_\_\_\_\_, 2015

TO BE COMPLETED BY TORT CLAIMANT, IF APPLICABLE:

\_\_\_\_\_  
Print or Type Name and Claim Number (if known)

\_\_\_\_\_  
Signature of Tort Claimant

\_\_\_\_\_  
Address of Tort Claimant

( ) \_\_\_\_\_  
Telephone Number of Tort Claimant

TO BE COMPLETED BY COUNSEL FOR TORT CLAIMANT, IF APPLICABLE:

**By signing this Ballot and Release, I make the following certifications under penalty of perjury pursuant to 28 U.S.C. § 1746:**



- I have explained the terms and effects of the Plan and this Release to the Tort Claimant listed below and have full and express authority to sign this Release on behalf of the Tort Claimant listed below.

\_\_\_\_\_  
Print or Type Name of Tort Claimant and Claim Number (if known)

\_\_\_\_\_  
Print or Type Name of Counsel for Tort Claimant

\_\_\_\_\_  
Signature of Counsel Tort Claimant

\_\_\_\_\_  
Address of Counsel for Tort Claimant

( ) \_\_\_\_\_  
Telephone Number of Counsel for Tort Claimant

**PART 3**  
**GENERAL RELEASE OF CLAIMS AGAINST THE PROVINCE**

Subject only to approval of the Province Settlement or the Province Alternate Settlement by the Bankruptcy Court under the Plan or pursuant to the Term Sheet, I hereby fully release and forever discharge any and all Claims against the Province that, directly or indirectly, relate to the Tort Claim, the injuries or damages alleged in the Tort Claim, whether known or unknown, suspected or unsuspected, in law or equity. This release shall be binding upon my successors, heirs, agents and representatives.

I represent and warrant that I have not assigned or otherwise transferred any interest in such Claims.

This General Release of Claims shall be effective as of the Effective Date of the Plan.

I consent to entry of the Confirmation Order, including the Province Channeling Injunction in Section 12.6B of the Plan.

Capitalized terms are defined in Section II of the Plan.

DATED: \_\_\_\_\_, 2015

TO BE COMPLETED BY TORT CLAIMANT, IF APPLICABLE:

\_\_\_\_\_  
Print or Type Name and Claim Number (if known)

\_\_\_\_\_  
Signature of Tort Claimant

\_\_\_\_\_  
Address of Tort Claimant

( ) \_\_\_\_\_  
Telephone Number of Tort Claimant

TO BE COMPLETED BY COUNSEL FOR TORT CLAIMANT, IF APPLICABLE:

**By signing this Ballot and Release, I make the following certifications under penalty of perjury pursuant to 28 U.S.C. § 1746:**

- I have explained the terms and effects of the Plan and this Release to the Tort Claimant listed below and have full and express authority to sign this Release on behalf of the Tort Claimant listed below.

\_\_\_\_\_  
Print or Type Name of Tort Claimant and Claim Number (if known)

\_\_\_\_\_  
Print or Type Name of Counsel for Tort Claimant

\_\_\_\_\_  
Signature of Counsel Tort Claimant

\_\_\_\_\_  
Address of Counsel for Tort Claimant

( ) \_\_\_\_\_  
Telephone Number of Counsel for Tort Claimant

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MONTANA

In Re:

Roman Catholic Bishop of Helena, Montana,  
a Montana Religious Corporation Sole,

Debtor-In-Possession

Chapter 11

Case No. 14-60074

**CLASS 4  
TORT CLAIM  
BALLOT AND RELEASE**

- **BALLOT FOR ACCEPTING OR REJECTING FIRST AMENDED JOINT PLAN OF REORGANIZATION DATED JANUARY \_\_, 2015 (“Plan”)**

**AND**

- **GENERAL RELEASE OF CLAIMS PURSUANT TO FIRST AMENDED JOINT PLAN OF REORGANIZATION DATED JANUARY \_\_, 2015**

**THIS DOCUMENT HAS TWO PARTS: (1) A BALLOT FOR ACCEPTING OR REJECTING THE PLAN, AND (2) A GENERAL RELEASE OF CLAIMS AGAINST THE PROTECTED PARTIES (EXCEPT THE PROVINCE), ANY INSURED ENTITIES, AND ANY OF THE SETTLING INSURERS’ REINSURERS AND RETROCESSIONAIRES.<sup>1</sup>**

**UNDER THE TERMS OF THE PLAN, YOU OR YOUR COUNSEL MUST SIGN AND RETURN THIS BALLOT AND RELEASE IN ORDER TO RECEIVE ANY FUNDS ON ACCOUNT OF YOUR TORT CLAIM.**

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<sup>1</sup> Capitalized terms are defined in the Plan.

**PART 1**  
**BALLOT FOR ACCEPTING OR REJECTING PLAN<sup>2</sup>**

**PLEASE READ THE ENTIRE BALLOT BEFORE COMPLETING IT.**

**By signing this Ballot, I make the following certifications under penalty of perjury pursuant to 28 U.S.C. § 1746:**

- I have been provided access to a copy of the Disclosure Statement, dated January \_\_, 2015, and the exhibits thereto.
- My Claim is just against the Diocese.

**By voting to accept the Plan, I expressly accept/represent the following:**

- **I ACCEPT THAT, EXCEPT AS EXPRESSLY PROVIDED IN THE PLAN, NONE OF THE EXCULPATED PARTIES WILL HAVE OR INCUR ANY LIABILITY TO, OR BE SUBJECT TO ANY RIGHT OF ACTION BY, ANY CLAIMANT, ANY OTHER PARTY IN INTEREST, OR ANY OF THEIR RESPECTIVE REPRESENTATIVES, FINANCIAL ADVISORS, OR AFFILIATES, OR ANY OF THEIR SUCCESSORS OR ASSIGNS, FOR ANY ACT OR OMISSION IN OR RELATING TO THIS CASE, INCLUDING THE EXERCISE OF THEIR RESPECTIVE BUSINESS JUDGMENT AND THE PERFORMANCE OF THEIR RESPECTIVE FIDUCIARY OBLIGATIONS, THE PURSUIT OF CONFIRMATION OF THE PLAN, OR THE ADMINISTRATION OF THE PLAN OR THE TRUST, EXCEPT LIABILITY FOR THEIR WILLFUL MISCONDUCT OR GROSS NEGLIGENCE (PROVIDED, HOWEVER, THE DEBTOR AND REORGANIZED DEBTOR WILL BE DISCHARGED FROM ANY SUCH LIABILITY FOR SUCH ACTS OR OMISSIONS OCCURRING PRIOR TO THE EFFECTIVE DATE) AND IN ALL RESPECTS, SUCH PARTIES WILL BE ENTITLED TO REASONABLY RELY UPON THE ADVICE OF COUNSEL WITH RESPECT TO THEIR DUTIES AND RESPONSIBILITIES UNDER THE PLAN OR IN THE CONTEXT OF THE CASE. WITHOUT LIMITING THE GENERALITY OF THE FOREGOING, THE DEBTOR AND ITS MEMBERS, FINANCIAL ADVISORS, AND OTHER PROFESSIONALS SHALL BE ENTITLED TO AND GRANTED THE BENEFITS OF § 1125(E) OF THE BANKRUPTCY CODE.**
- **I ACCEPT THAT THE SETTLING INSURERS, THE REORGANIZED DEBTOR, THE TRUST, THE TRUSTEE, THE PROVINCE AND PROFESSIONALS EMPLOYED BY THE FOREGOING SHALL NOT HAVE ANY LIABILITY TO ANY ENTITY, INCLUDING ANY GOVERNMENTAL ENTITY OR INSURER, ON ACCOUNT OF PAYMENTS MADE TO A TORT CLAIMANT, INCLUDING ANY LIABILITY UNDER THE MEDICARE SECONDARY PAYER ACT. THIS EXCULPATION SHALL NOT APPLY TO THE PROVINCE IF THE BANKRUPTCY COURT DOES NOT APPROVE THE PROVINCE SETTLEMENT OR THE ALTERNATE PROVINCE SETTLEMENT.**

**YOU OR YOUR COUNSEL MAY COMPLETE THIS BALLOT**

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<sup>2</sup> This Ballot is for voting purposes only and does not constitute and shall not be deemed a proof of claim or interest or an admission of the validity of a claim or interest.

**TO HAVE YOUR VOTE COUNT YOU OR YOUR COUNSEL MUST COMPLETE AND RETURN THIS BALLOT BY 5:00 P.M., MOUNTAIN TIME ON \_\_\_\_\_, 2015.**

The undersigned, a holder of a Class 4 Tort Claim, votes (check one box only):

<input type="checkbox"/> to <b>ACCEPT</b> the Plan	<input type="checkbox"/> to <b>REJECT</b> the Plan
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Amount of Your Claim for Voting Purposes Only: \$1.00

By signing this Ballot, the undersigned makes the certifications herein.

DATED: \_\_\_\_\_, 2015

**TO BE COMPLETED BY TORT CLAIMANT, IF APPLICABLE:**

\_\_\_\_\_  
Print or Type Name and Claim Number (if known)

\_\_\_\_\_  
Signature of Tort Claimant

\_\_\_\_\_  
Address of Tort Claimant

( ) \_\_\_\_\_  
Telephone Number of Tort Claimant

**TO BE COMPLETED BY COUNSEL FOR TORT CLAIMANT, IF APPLICABLE:**

**By signing this Ballot and Release, I make the following certifications under penalty of perjury pursuant to 28 U.S.C. § 1746:**

- I have explained the terms and effects of the Plan and this Ballot to the Tort Claimant listed below and have full and express authority to: (1) vote to accept or reject the Plan on behalf of the

Tort Claimant listed on this Ballot, and (2) sign this Ballot on behalf of the Tort Claimant listed on this Ballot.

\_\_\_\_\_  
Print or Type Name of Tort Claimant and Claim Number (if known)

\_\_\_\_\_  
Print or Type Name of Counsel for Tort Claimant

\_\_\_\_\_  
Signature of Counsel Tort Claimant

\_\_\_\_\_  
Address of Counsel for Tort Claimant

( ) \_\_\_\_\_  
Telephone Number of Counsel for Tort Claimant

Return this Ballot to **ROMAN CATHOLIC BISHOP OF HELENA, MONTANA., C/O OMNI ACQUISITION CORP., 5955 DESOTO AVE., STE. 100, WOODLAND HILLS, CA 91367.** If your Ballot is NOT RECEIVED by 5:00 p.m., Mountain Time on \_\_\_\_\_ 2015, it will not be counted.

**PART 2**  
**GENERAL RELEASE OF CLAIMS**

I hereby fully release and forever discharge any and all Claims against any of the Protected Parties (except the Province), any Insured Entity, and any of the Settling Insurers' reinsurers or retrocessionaires that, directly or indirectly, relate to the Tort Claims, the injuries or damages alleged by any of the Tort Claimants, or the Policies, whether known or unknown, suspected or unsuspected, in law or equity. This release shall be binding upon my successors, heirs, agents and representatives.

I represent and warrant that I have not assigned or otherwise transferred any interest in such Claims.

This General Release of Claims shall be effective as of the Effective Date of the Plan.

Capitalized terms are defined in Section II of the Plan.

DATED: \_\_\_\_\_, 2015

TO BE COMPLETED BY TORT CLAIMANT, IF APPLICABLE:

\_\_\_\_\_  
Print or Type Name and Claim Number (if known)

\_\_\_\_\_  
Signature of Tort Claimant

\_\_\_\_\_  
Address of Tort Claimant

( ) \_\_\_\_\_  
Telephone Number of Tort Claimant

TO BE COMPLETED BY COUNSEL FOR TORT CLAIMANT, IF APPLICABLE:

**By signing this Ballot and Release, I make the following certifications under penalty of perjury pursuant to 28 U.S.C. § 1746:**



- I have explained the terms and effects of the Plan and this Release to the Tort Claimant listed below and have full and express authority to sign this Release on behalf of the Tort Claimant listed below.

\_\_\_\_\_  
Print or Type Name of Tort Claimant and Claim Number (if known)

\_\_\_\_\_  
Print or Type Name of Counsel for Tort Claimant

\_\_\_\_\_  
Signature of Counsel Tort Claimant

\_\_\_\_\_  
Address of Counsel for Tort Claimant

( ) \_\_\_\_\_  
Telephone Number of Counsel for Tort Claimant

**IF THIS BALLOT IS NOT RECEIVED BY THE BALLOTING AGENT BY 5:00 P.M. ON \_\_\_\_\_, 2015 YOUR VOTE WILL NOT BE COUNTED.**

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MONTANA**

In Re:

Roman Catholic Bishop of Helena, Montana,  
a Montana Religious Corporation Sole,

Chapter 11

Case No. 14-60074

Debtor-In-Possession

**CLASS 5 FUTURE  
TORT CLAIMS**

**BALLOT FOR ACCEPTING OR REJECTING JOINT  
PLAN OF REORGANIZATION DATED \_\_\_\_\_, \_\_, 2015**

**PLEASE READ ALL OF THIS BALLOT BEFORE COMPLETING THIS BALLOT.**

The undersigned, a holder of a General Unsecured Claim, votes (check one box only):

<input type="checkbox"/> to <b>ACCEPT</b> the Plan	<input type="checkbox"/> to <b>REJECT</b> the Plan
--	--

Amount of Your Claim for Voting Purposes Only: **\$1.00**

By signing this Ballot, the undersigned makes the certifications set forth below.

Name of Creditor:

\_\_\_\_\_  
(Print or Type)

Street Address: \_\_\_\_\_

\_\_\_\_\_  
City, State, and Zip Code

By: \_\_\_\_\_

Telephone Number: (\_\_\_\_) \_\_\_\_\_

Print Name of Signatory: \_\_\_\_\_

\_\_\_\_\_  
Social Security or Federal Tax I.D. No.

Title: \_\_\_\_\_  
(if Appropriate)

Date Completed: \_\_\_\_\_

**PLEASE READ THE FOLLOWING BEFORE COMPLETING YOUR BALLOT**

Please complete, sign, and date this Ballot. Return this Ballot to **ROMAN CATHOLIC BISHOP OF HELENA, MONTANA., C/O OMNI ACQUISITION CORP., 5955 DESOTO AVE., STE. 100,**

**WOODLAND HILLS, CA 91367.** If your Ballot is NOT RECEIVED by 5:00 p.m., prevailing Mountain Time on \_\_\_\_\_ 2015, it will not be counted.

On \_\_\_\_\_ 2015, the United States Bankruptcy Court for the District of Montana signed an Order, which establishes certain procedures for the solicitation and tabulation of votes to accept or reject the Plan.

**By signing this Ballot, I certify under penalty of perjury pursuant to 28 U.S.C. § 1746 that I have been provided access to a copy of the Disclosure Statement, dated January \_\_, 2015, and the exhibits thereto.**

**By voting to accept the Plan, I expressly accept/represent the following:**

- I accept the Province Settlement, if approved by the Bankruptcy Court.
- **I ACCEPT THAT EXCEPT AS EXPRESSLY PROVIDED IN THE PLAN, NONE OF THE EXCULPATED PARTIES WILL HAVE OR INCUR ANY LIABILITY TO, OR BE SUBJECT TO ANY RIGHT OF ACTION BY, ANY CLAIMANT, ANY OTHER PARTY IN INTEREST, OR ANY OF THEIR RESPECTIVE REPRESENTATIVES, FINANCIAL ADVISORS, OR AFFILIATES, OR ANY OF THEIR SUCCESSORS OR ASSIGNS, FOR ANY ACT OR OMISSION IN OR RELATING TO THIS CASE, INCLUDING THE EXERCISE OF THEIR RESPECTIVE BUSINESS JUDGMENT AND THE PERFORMANCE OF THEIR RESPECTIVE FIDUCIARY OBLIGATIONS, THE PURSUIT OF CONFIRMATION OF THE PLAN, OR THE ADMINISTRATION OF THE PLAN OR THE TRUST, EXCEPT LIABILITY FOR THEIR WILLFUL MISCONDUCT OR GROSS NEGLIGENCE (PROVIDED, HOWEVER, THE DEBTOR AND REORGANIZED DEBTOR WILL BE DISCHARGED FROM ANY SUCH LIABILITY FOR SUCH ACTS OR OMISSIONS OCCURRING PRIOR TO THE EFFECTIVE DATE) AND IN ALL RESPECTS, SUCH PARTIES WILL BE ENTITLED TO REASONABLY RELY UPON THE ADVICE OF COUNSEL WITH RESPECT TO THEIR DUTIES AND RESPONSIBILITIES UNDER THE PLAN OR IN THE CONTEXT OF THE CASE. WITHOUT LIMITING THE GENERALITY OF THE FOREGOING, THE DEBTOR AND ITS MEMBERS, FINANCIAL ADVISORS, AND OTHER PROFESSIONALS SHALL BE ENTITLED TO AND GRANTED THE BENEFITS OF § 1125(E) OF THE BANKRUPTCY CODE. THIS EXCULPATION SHALL NOT APPLY TO THE PROVINCE IF THE BANKRUPTCY COURT DOES NOT APPROVE THE PROVINCE SETTLEMENT OR THE ALTERNATE PROVINCE SETTLEMENT.**
- **I ACCEPT THAT THE SETTLING INSURERS, THE REORGANIZED DEBTOR, THE TRUST, THE TRUSTEE, THE PROVINCE AND PROFESSIONALS EMPLOYED BY THE FOREGOING SHALL NOT HAVE ANY LIABILITY TO ANY ENTITY, INCLUDING ANY GOVERNMENTAL ENTITY OR INSURER, ON ACCOUNT OF PAYMENTS MADE TO A TORT CLAIMANT, INCLUDING ANY LIABILITY UNDER THE MEDICARE SECONDARY PAYER ACT. THIS EXCULPATION SHALL NOT APPLY TO THE PROVINCE IF THE BANKRUPTCY COURT DOES NOT APPROVE THE PROVINCE SETTLEMENT OR THE ALTERNATE PROVINCE SETTLEMENT.**

To have your vote count you must complete and return this Ballot by 5:00 p.m., prevailing Mountain Time on \_\_\_\_\_, 2015.

This Ballot is for voting purposes only and does not constitute and shall not be deemed a proof of claim or interest or an admission of the validity of a claim or interest.

UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MONTANA

IF THIS BALLOT IS NOT  
RECEIVED BY THE  
BALLOTING AGENT BY  
5:00 P.M. ON \_\_\_\_\_, 2015  
YOUR VOTE WILL NOT  
BE COUNTED.

In Re:

Roman Catholic Bishop of Helena, Montana,  
a Montana Religious Corporation Sole,

Debtor-In-Possession

Chapter 11

Case No. 14-60074

**CLASS 6 GENERAL  
UNSECURED CLAIMS**

**BALLOT FOR ACCEPTING OR REJECTING JOINT  
PLAN OF REORGANIZATION DATED \_\_\_\_\_, \_\_\_, 2015**

**PLEASE READ BOTH SIDES OF THIS BALLOT BEFORE COMPLETING THIS BALLOT.**  
The undersigned, a holder of a General Unsecured Claim, votes (check one box only):

<input type="checkbox"/> to <b>ACCEPT</b> the Plan	<input type="checkbox"/> to <b>REJECT</b> the Plan
--	--

Amount of Your Claim for Voting Purposes Only:  
\$ \_\_\_\_\_

By signing this Ballot, the undersigned makes the  
certifications set forth below.

Name of Creditor:

\_\_\_\_\_  
(Print or Type)

Street Address: \_\_\_\_\_

\_\_\_\_\_  
City, State, and Zip Code

By: \_\_\_\_\_

Telephone Number: (\_\_\_\_) \_\_\_\_\_

Print Name of  
Signatory: \_\_\_\_\_

\_\_\_\_\_  
Social Security or Federal Tax I.D. No.

Title: \_\_\_\_\_  
(if Appropriate)

Date Completed: \_\_\_\_\_

**PLEASE READ THE FOLLOWING BEFORE COMPLETING YOUR BALLOT**

Please complete, sign, and date this Ballot. Return this Ballot to **ROMAN CATHOLIC BISHOP OF HELENA, MONTANA., C/O OMNI ACQUISITION CORP., 5955 DESOTO AVE., STE. 100, WOODLAND HILLS, CA 91367.** If your Ballot is NOT RECEIVED by 5:00 p.m., prevailing Mountain Time on \_\_\_\_\_ 2015, it will not be counted.

On \_\_\_\_\_ 2015, the United States Bankruptcy Court for the District of Montana entered an Order, which establishes certain procedures for the solicitation and tabulation of votes to accept or reject the Plan.

**By signing this Ballot, I make the following certifications under penalty of perjury pursuant to 28 U.S.C. § 1746:**

- I have been provided access to a copy of the Disclosure Statement, dated January \_\_, 2015, and the exhibits thereto.
- I have the full power and authority to vote to accept or reject the Plan on behalf of the creditor listed on the reverse side.
- I have reviewed and accept the following exculpation provisions in the Plan:
- **I ACCEPT THAT, EXCEPT AS EXPRESSLY PROVIDED IN THE PLAN, NONE OF THE EXCULPATED PARTIES WILL HAVE OR INCUR ANY LIABILITY TO, OR BE SUBJECT TO ANY RIGHT OF ACTION BY, ANY CLAIMANT, ANY OTHER PARTY IN INTEREST, OR ANY OF THEIR RESPECTIVE REPRESENTATIVES, FINANCIAL ADVISORS, OR AFFILIATES, OR ANY OF THEIR SUCCESSORS OR ASSIGNS, FOR ANY ACT OR OMISSION IN OR RELATING TO THIS CASE, INCLUDING THE EXERCISE OF THEIR RESPECTIVE BUSINESS JUDGMENT AND THE PERFORMANCE OF THEIR RESPECTIVE FIDUCIARY OBLIGATIONS, THE PURSUIT OF CONFIRMATION OF THE PLAN, OR THE ADMINISTRATION OF THE PLAN OR THE TRUST, EXCEPT LIABILITY FOR THEIR WILLFUL MISCONDUCT OR GROSS NEGLIGENCE (PROVIDED, HOWEVER, THE DEBTOR AND REORGANIZED DEBTOR WILL BE DISCHARGED FROM ANY SUCH LIABILITY FOR SUCH ACTS OR OMISSIONS OCCURRING PRIOR TO THE EFFECTIVE DATE) AND IN ALL RESPECTS, SUCH PARTIES WILL BE ENTITLED TO REASONABLY RELY UPON THE ADVICE OF COUNSEL WITH RESPECT TO THEIR DUTIES AND RESPONSIBILITIES UNDER THE PLAN OR IN THE CONTEXT OF THE CASE. WITHOUT LIMITING THE GENERALITY OF THE FOREGOING, THE DEBTOR AND ITS MEMBERS, FINANCIAL ADVISORS, AND OTHER PROFESSIONALS SHALL BE ENTITLED TO AND GRANTED THE BENEFITS OF § 1125(E) OF THE BANKRUPTCY CODE.**

**To have your vote count you must complete and return this Ballot by 5:00 p.m., prevailing Mountain Time on \_\_\_\_\_, 2015.**

This Ballot is for voting purposes only and does not constitute and shall not be deemed a proof of claim or interest or an admission of the validity of a claim or interest.

**IF THIS BALLOT IS NOT RECEIVED BY THE BALLOTING AGENT BY 5:00 P.M. ON \_\_\_\_\_, 2015 YOUR VOTE WILL NOT BE COUNTED.**

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MONTANA**

In Re:

Roman Catholic Bishop of Helena, Montana,  
a Montana Religious Corporation Sole,

Chapter 11

Case No. 14-60074

Debtor-In-Possession

**CLASS 10  
SHAELA EVENSON CLAIM**

**BALLOT FOR ACCEPTING OR REJECTING JOINT  
PLAN OF REORGANIZATION DATED \_\_\_\_\_, \_\_\_\_, 2015**

**PLEASE READ BOTH SIDES OF THIS BALLOT BEFORE COMPLETING THIS BALLOT.**

The undersigned, a holder of a General Unsecured Claim, votes (check one box only):

<input type="checkbox"/> to <b>ACCEPT</b> the Plan	<input type="checkbox"/> to <b>REJECT</b> the Plan
--	--

Amount of Your Claim for Voting Purposes Only:  
\$ \_\_\_\_\_

By signing this Ballot, the undersigned makes the certifications set forth below.

Name of Creditor: \_\_\_\_\_  
(Print or Type)

Street Address: \_\_\_\_\_  
City, State, and Zip Code

By: \_\_\_\_\_

Telephone Number: (\_\_\_\_) \_\_\_\_\_

Print Name of Signatory: \_\_\_\_\_

\_\_\_\_\_  
Social Security or Federal Tax I.D. No.

Title: \_\_\_\_\_  
(if Appropriate)

Date Completed: \_\_\_\_\_

**PLEASE READ THE FOLLOWING BEFORE COMPLETING YOUR BALLOT**

Please complete, sign, and date this Ballot. Return this Ballot to **ROMAN CATHOLIC BISHOP OF HELENA, MONTANA., C/O OMNI ACQUISITION CORP., 5955 DESOTO AVE., STE. 100,**

**WOODLAND HILLS, CA 91367.** If your Ballot is NOT RECEIVED by 5:00 p.m., prevailing Mountain Time on \_\_\_\_\_ 2015, it will not be counted.

On \_\_\_\_\_ 2015, the United States Bankruptcy Court for the District of Montana entered an Order, which establishes certain procedures for the solicitation and tabulation of votes to accept or reject the Plan.

**By signing this Ballot, I make the following certifications under penalty of perjury pursuant to 28 U.S.C. § 1746:**

- I have been provided access to a copy of the Disclosure Statement, dated January \_\_, 2015, and the exhibits thereto.
- I have the full power and authority to vote to accept or reject the Plan on behalf of the creditor listed on the reverse side.
- I have reviewed and accept the following exculpation provisions in the Plan:
- **I ACCEPT THAT, EXCEPT AS EXPRESSLY PROVIDED IN THE PLAN, NONE OF THE EXCULPATED PARTIES WILL HAVE OR INCUR ANY LIABILITY TO, OR BE SUBJECT TO ANY RIGHT OF ACTION BY, ANY CLAIMANT, ANY OTHER PARTY IN INTEREST, OR ANY OF THEIR RESPECTIVE REPRESENTATIVES, FINANCIAL ADVISORS, OR AFFILIATES, OR ANY OF THEIR SUCCESSORS OR ASSIGNS, FOR ANY ACT OR OMISSION IN OR RELATING TO THIS CASE, INCLUDING THE EXERCISE OF THEIR RESPECTIVE BUSINESS JUDGMENT AND THE PERFORMANCE OF THEIR RESPECTIVE FIDUCIARY OBLIGATIONS, THE PURSUIT OF CONFIRMATION OF THE PLAN, OR THE ADMINISTRATION OF THE PLAN OR THE TRUST, EXCEPT LIABILITY FOR THEIR WILLFUL MISCONDUCT OR GROSS NEGLIGENCE (PROVIDED, HOWEVER, THE DEBTOR AND REORGANIZED DEBTOR WILL BE DISCHARGED FROM ANY SUCH LIABILITY FOR SUCH ACTS OR OMISSIONS OCCURRING PRIOR TO THE EFFECTIVE DATE) AND IN ALL RESPECTS, SUCH PARTIES WILL BE ENTITLED TO REASONABLY RELY UPON THE ADVICE OF COUNSEL WITH RESPECT TO THEIR DUTIES AND RESPONSIBILITIES UNDER THE PLAN OR IN THE CONTEXT OF THE CASE. WITHOUT LIMITING THE GENERALITY OF THE FOREGOING, THE DEBTOR AND ITS MEMBERS, FINANCIAL ADVISORS, AND OTHER PROFESSIONALS SHALL BE ENTITLED TO AND GRANTED THE BENEFITS OF § 1125(E) OF THE BANKRUPTCY CODE.**

**To have your vote count you must complete and return this Ballot by 5:00 p.m., prevailing Mountain Time on \_\_\_\_\_, 2015.**

This Ballot is for voting purposes only and does not constitute and shall not be deemed a proof of claim or interest or an admission of the validity of a claim or interest.



**IF THIS BALLOT IS NOT RECEIVED BY THE BALLOTING AGENT BY 5:00 P.M. ON \_\_\_\_\_, 2015 YOUR VOTE WILL NOT BE COUNTED.**

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MONTANA**

In Re:  
  
Roman Catholic Bishop of Helena, Montana,  
a Montana Religious Corporation Sole,  
  
Debtor-In-Possession

Chapter 11  
Case No. 14-60074

**CLASS 11  
DEPOSIT AND LOAN FUND CLAIM**

**BALLOT FOR ACCEPTING OR REJECTING JOINT  
PLAN OF REORGANIZATION DATED \_\_\_\_\_, \_\_, 2015**

**PLEASE READ BOTH SIDES OF THIS BALLOT BEFORE COMPLETING THIS BALLOT.**  
The undersigned, a holder of a General Unsecured Claim, votes (check one box only):

<input type="checkbox"/> to <b>ACCEPT</b> the Plan	<input type="checkbox"/> to <b>REJECT</b> the Plan
--	--

Amount of Your Claim for Voting Purposes Only:  
\$ \_\_\_\_\_

By signing this Ballot, the undersigned makes the certifications set forth below.

Name of Creditor: \_\_\_\_\_  
(Print or Type)

Street Address: \_\_\_\_\_  
City, State, and Zip Code

By: \_\_\_\_\_

Telephone Number: (\_\_\_\_) \_\_\_\_\_

Print Name of Signatory: \_\_\_\_\_

\_\_\_\_\_  
Social Security or Federal Tax I.D. No.

Title: \_\_\_\_\_  
(if Appropriate)

Date Completed: \_\_\_\_\_

**PLEASE READ THE FOLLOWING BEFORE COMPLETING YOUR BALLOT**

Please complete, sign, and date this Ballot. Return this Ballot to **ROMAN CATHOLIC BISHOP OF HELENA, MONTANA., C/O OMNI ACQUISITION CORP., 5955 DESOTO AVE., STE. 100,**

**WOODLAND HILLS, CA 91367.** If your Ballot is NOT RECEIVED by 5:00 p.m., prevailing Mountain Time on \_\_\_\_\_ 2015, it will not be counted.

On \_\_\_\_\_ 2015, the United States Bankruptcy Court for the District of Montana entered an Order, which establishes certain procedures for the solicitation and tabulation of votes to accept or reject the Plan.

**By signing this Ballot, I make the following certifications under penalty of perjury pursuant to 28 U.S.C. § 1746:**

- I have been provided access to a copy of the Disclosure Statement, dated January \_\_, 2015, and the exhibits thereto.
- I have the full power and authority to vote to accept or reject the Plan on behalf of the creditor listed on the reverse side.
- I have reviewed and accept the following exculpation provisions in the Plan:
- **I ACCEPT THAT, EXCEPT AS EXPRESSLY PROVIDED IN THE PLAN, NONE OF THE EXCULPATED PARTIES WILL HAVE OR INCUR ANY LIABILITY TO, OR BE SUBJECT TO ANY RIGHT OF ACTION BY, ANY CLAIMANT, ANY OTHER PARTY IN INTEREST, OR ANY OF THEIR RESPECTIVE REPRESENTATIVES, FINANCIAL ADVISORS, OR AFFILIATES, OR ANY OF THEIR SUCCESSORS OR ASSIGNS, FOR ANY ACT OR OMISSION IN OR RELATING TO THIS CASE, INCLUDING THE EXERCISE OF THEIR RESPECTIVE BUSINESS JUDGMENT AND THE PERFORMANCE OF THEIR RESPECTIVE FIDUCIARY OBLIGATIONS, THE PURSUIT OF CONFIRMATION OF THE PLAN, OR THE ADMINISTRATION OF THE PLAN OR THE TRUST, EXCEPT LIABILITY FOR THEIR WILLFUL MISCONDUCT OR GROSS NEGLIGENCE (PROVIDED, HOWEVER, THE DEBTOR AND REORGANIZED DEBTOR WILL BE DISCHARGED FROM ANY SUCH LIABILITY FOR SUCH ACTS OR OMISSIONS OCCURRING PRIOR TO THE EFFECTIVE DATE) AND IN ALL RESPECTS, SUCH PARTIES WILL BE ENTITLED TO REASONABLY RELY UPON THE ADVICE OF COUNSEL WITH RESPECT TO THEIR DUTIES AND RESPONSIBILITIES UNDER THE PLAN OR IN THE CONTEXT OF THE CASE. WITHOUT LIMITING THE GENERALITY OF THE FOREGOING, THE DEBTOR AND ITS MEMBERS, FINANCIAL ADVISORS, AND OTHER PROFESSIONALS SHALL BE ENTITLED TO AND GRANTED THE BENEFITS OF § 1125(E) OF THE BANKRUPTCY CODE.**

**To have your vote count you must complete and return this Ballot by 5:00 p.m., prevailing Mountain Time on \_\_\_\_\_, 2015.**

This Ballot is for voting purposes only and does not constitute and shall not be deemed a proof of claim or interest or an admission of the validity of a claim or interest.

**IF THIS BALLOT IS NOT RECEIVED BY THE BALLOTING AGENT BY 5:00 P.M. ON \_\_\_\_\_, 2015 YOUR VOTE WILL NOT BE COUNTED.**

**UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF MONTANA**

In Re:

Roman Catholic Bishop of Helena, Montana,  
a Montana Religious Corporation Sole,

Chapter 11

Case No. 14-60074

Debtor-In-Possession

**CLASS 12  
PROVINCE CONTRIBUTION CLAIM**

**BALLOT FOR ACCEPTING OR REJECTING JOINT  
PLAN OF REORGANIZATION DATED \_\_\_\_\_, \_\_\_, 2015**

**PLEASE READ BOTH SIDES OF THIS BALLOT BEFORE COMPLETING THIS BALLOT.**

The undersigned, a holder of a General Unsecured Claim, votes (check one box only):

<input type="checkbox"/> to <b>ACCEPT</b> the Plan	<input type="checkbox"/> to <b>REJECT</b> the Plan
--	--

Amount of Your Claim for Voting Purposes Only:  
\$ \_\_\_\_\_

By signing this Ballot, the undersigned makes the certifications set forth below.

Name of Creditor:

\_\_\_\_\_  
(Print or Type)

Street Address: \_\_\_\_\_

\_\_\_\_\_  
City, State, and Zip Code

By: \_\_\_\_\_

Telephone Number: (\_\_\_\_) \_\_\_\_\_

Print Name of Signatory: \_\_\_\_\_

\_\_\_\_\_  
Social Security or Federal Tax I.D. No.

Title: \_\_\_\_\_  
(if Appropriate)

Date Completed: \_\_\_\_\_

**PLEASE READ THE FOLLOWING BEFORE COMPLETING YOUR BALLOT**

Please complete, sign, and date this Ballot. Return this Ballot to **ROMAN CATHOLIC BISHOP OF HELENA, MONTANA., C/O OMNI ACQUISITION CORP., 5955 DESOTO AVE., STE. 100,**

**WOODLAND HILLS, CA 91367.** If your Ballot is NOT RECEIVED by 5:00 p.m., prevailing Mountain Time on \_\_\_\_\_ 2015, it will not be counted.

On \_\_\_\_\_ 2015, the United States Bankruptcy Court for the District of Montana entered an Order, which establishes certain procedures for the solicitation and tabulation of votes to accept or reject the Plan.

**By signing this Ballot, I make the following certifications under penalty of perjury pursuant to 28 U.S.C. § 1746:**

- I have been provided access to a copy of the Disclosure Statement, dated January \_\_, 2015, and the exhibits thereto.
- I have the full power and authority to vote to accept or reject the Plan on behalf of the creditor listed on the reverse side.
- I have reviewed and accept the following exculpation provisions in the Plan:
- **I ACCEPT THAT, EXCEPT AS EXPRESSLY PROVIDED IN THE PLAN, NONE OF THE EXCULPATED PARTIES WILL HAVE OR INCUR ANY LIABILITY TO, OR BE SUBJECT TO ANY RIGHT OF ACTION BY, ANY CLAIMANT, ANY OTHER PARTY IN INTEREST, OR ANY OF THEIR RESPECTIVE REPRESENTATIVES, FINANCIAL ADVISORS, OR AFFILIATES, OR ANY OF THEIR SUCCESSORS OR ASSIGNS, FOR ANY ACT OR OMISSION IN OR RELATING TO THIS CASE, INCLUDING THE EXERCISE OF THEIR RESPECTIVE BUSINESS JUDGMENT AND THE PERFORMANCE OF THEIR RESPECTIVE FIDUCIARY OBLIGATIONS, THE PURSUIT OF CONFIRMATION OF THE PLAN, OR THE ADMINISTRATION OF THE PLAN OR THE TRUST, EXCEPT LIABILITY FOR THEIR WILLFUL MISCONDUCT OR GROSS NEGLIGENCE (PROVIDED, HOWEVER, THE DEBTOR AND REORGANIZED DEBTOR WILL BE DISCHARGED FROM ANY SUCH LIABILITY FOR SUCH ACTS OR OMISSIONS OCCURRING PRIOR TO THE EFFECTIVE DATE) AND IN ALL RESPECTS, SUCH PARTIES WILL BE ENTITLED TO REASONABLY RELY UPON THE ADVICE OF COUNSEL WITH RESPECT TO THEIR DUTIES AND RESPONSIBILITIES UNDER THE PLAN OR IN THE CONTEXT OF THE CASE. WITHOUT LIMITING THE GENERALITY OF THE FOREGOING, THE DEBTOR AND ITS MEMBERS, FINANCIAL ADVISORS, AND OTHER PROFESSIONALS SHALL BE ENTITLED TO AND GRANTED THE BENEFITS OF § 1125(E) OF THE BANKRUPTCY CODE.**

**To have your vote count you must complete and return this Ballot by 5:00 p.m., prevailing Mountain Time on \_\_\_\_\_, 2015.**

This Ballot is for voting purposes only and does not constitute and shall not be deemed a proof of claim or interest or an admission of the validity of a claim or interest.