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UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA

OAKLAND DIVISION

In re: THE ROMAN CATHOLIC BISHOP OF OAKLAND, a California corporation sole, Debtor.	CHAPTER 11 CASE NO: 23-40523 WJL HON. WILLIAM J. LAFFERTY **THIRD AMENDED COMPLAINT FOR DECLARATORY JUDGMENT RELIEF, BREACH OF CONTRACT, AND BREACH OF STATUTORY DUTY**
THE ROMAN CATHOLIC BISHOP OF OAKLAND, PLAINTIFF, V. PACIFIC INDEMNITY, a Delaware corporation; TRAVELERS CASUALTY & SURETY COMPANY F/K/A AETNA CASUALTY & SURETY COMPANY, a Connecticut corporation; INSURANCE COMPANY OF NORTH AMERICA, a Delaware corporation; UNITED STATES FIRE INSURANCE, a Delaware corporation;	ADVERSARY CASE NO. 23-04028 WJL

WESTPORT INSURANCE CORPORATION, a Delaware corporation; CONTINENTAL CASUALTY COMPANY, a Delaware corporation; PACIFIC EMPLOYERS INSURANCE, a Delaware corporation; WESTCHESTER FIRE INSURANCE COMPANY, a Pennsylvania corporation; the CALIFORNIA INSURANCE GUARANTEE ASSOCIATION, a state entity, and CERTAIN UNDERWRITERS AT LLOYD'S, LONDON, SUBSCRIBING SEVERALLY AND NOT JOINTLY TO SLIP NOS. CU 1001 AND K 66034 ISSUED TO THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO, AND NOS. K 78138 AND CU 3061 ISSUED TO THE ROMAN CATHOLIC BISHOP OF OAKLAND,

DEFENDANTS.[1]

[1] After communication with the Defendants regarding the proper names of the Defendants, the Debtor has corrected and updated the named Defendants. The Debtor filed voluntary dismissal for ACE Limited, Insurance Company of America, and Certain Underwriters at Lloyd's of London Subscribing to Syndicates 2623 (AFB) And 623 (AFB). *See* Docket Nos. 65, 66, & 118, respectively.

Plaintiff THE ROMAN CATHOLIC BISHOP OF OAKLAND, plaintiff in the above-captioned action, for its Third Amended Complaint for Declaratory Judgment Relief, Breach of Contract, and Breach of Statutory Duty (the "Third Amended Complaint") against Defendants PACIFIC INDEMNITY, a Delaware corporation; TRAVELERS CASUALTY & SURETY COMPANY F/K/A AETNA CASUALTY & SURETY COMPANY, a Connecticut corporation; INSURANCE COMPANY OF NORTH AMERICA, a Delaware corporation; UNITED STATES FIRE INSURANCE, a Delaware corporation; WESTPORT INSURANCE CORPORATION, a Delaware corporation; CONTINENTAL CASUALTY COMPANY, a Delaware corporation; PACIFIC EMPLOYERS INSURANCE, a Delaware corporation; WESTCHESTER FIRE INSURANCE COMPANY, a Pennsylvania corporation; the CALIFORNIA INSURANCE GUARANTEE ASSOCIATION, a state entity, and CERTAIN UNDERWRITERS AT LLOYD'S, LONDON, SUBSCRIBING SEVERALLY AND NOT JOINTLY TO SLIP NOS. CU 1001 AND K 66034 ISSUED TO THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO, AND NOS. K 78138 AND CU 3061 ISSUED TO THE ROMAN CATHOLIC BISHOP OF OAKLAND (collectively, the "Defendants"), alleges as follows:

Attached hereto is **Exhibit A** which lays out the specific claims as of the date of this filing. Each claim details the claim number designated by RCBO, the case number assigned to the case by the court below, the name of the insurance carrier, the years of the alleged abuse, the date RCBO tendered the claim to its respective insurers, the date of the insurer's response, and the insurer's response. Exhibit A may be the subject of further up-dating and disclosure as the matter progresses.

JURISDICTION AND VENUE

1. This Court has jurisdiction over this adversary proceeding pursuant to sections 157 and 1334 of title 28 of the United States Code ("Title 28").

2. This proceeding is a core proceeding pursuant to sections 157(b) of Title 28.

3. Venue in this Court is proper pursuant to sections 1408 and 1409 of Title 28.

4. Plaintiff consents to the entry of a final order or judgment by this Court in connection with this adversary proceeding to the extent it is later determined that this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

NATURE OF THE ACTION

5. This is an action for declaratory judgment, breach of contract, and breach of statutory duty.

THE PARTIES

6. Plaintiff THE ROMAN CATHOLIC BISHOP OF OAKLAND (herein "Plaintiff", "RCBO" or the "Debtor") is a California corporation sole with its principal place of business in Oakland, California.

7. Defendant PACIFIC INDEMNITY (also referenced generally as "Chubb") is, on information and belief, a Delaware corporation which conducted business in this District and issued written primary policies of insurance to RCBO under Policy No. LAC127792 for the period March 12, 1962 to October 25, 1963 and Policy No. LAC 155598 for the period October 25, 1963 to October 25, 1966 (herein "PACIFIC"). Specifically, PACIFIC is responsive to certain claims, including but not limited to the following claims:

- Nos. 42, 45, 53, 57, 65, 70, 74, 75, 79, 98, 107, 109, 114, 119, 120, 137, 142, 147, 150, 155, 176, 177, 185, 187, 197, 202, 204, 214, 233, 234, 239, 245, 248, 252, 257, 285, 292, 299, 307, 308, 328, 360, 381, 383, 391;

as shown on Exhibit A, and has either failed to respond to the tenders, issued reservation of rights letters or explicitly denied coverage as noted in Exhibit A. *See* Exhibit A.

8. Defendant TRAVELERS CASUALTY & SURETY COMPANY F/K/A AETNA CASUALTY & SURETY COMPANY is, on information and belief, a Connecticut corporation which conducted business in this District (herein "TRAVELERS"). TRAVELERS issued written primary policies of insurance to RCBO under Policy No. 05 AL 802025 CMA for the period December 1, 1975 to December 1, 1978; Policy No. 05 SM90296 FCA for the period December 1, 1978 to December 1, 1979; Policy No. 05 SM 99094 FCA for the period December 1, 1979 to December 1, 1980; and Policy No. 05 SM 107459 FCA for the period December 1, 1980 to December 1, 1981. Specifically, TRAVELERS is responsive to certain claims, including but not limited to the following claims:

- 2, 7, 10, 13, 16, 17, 19, 20, 21, 22, 25, 26, 28, 29, 31, 33, 35, 40, 41, 42, 43, 45, 54, 56, 58, 59, 61, 63, 64, 71, 80, 82, 83, 86, 88, 92, 95, 96, 97, 99, 101, 102, 103, 104, 105, 106,

110, 115, 117, 121, 126, 128, 131, 132, 133, 140, 144, 149, 152, 154, 157, 158, 163, 166, 168, 172, 174, 180, 181, 182, 189, 190, 191, 192, 193, 194, 198, 200, 203, 206, 208, 209, 210, 211, 212, 213, 215, 216, 223, 224, 225, 227, 229, 230, 243, 244, 247, 249, 250, 251, 256, 258, 259, 266, 267, 272, 273, 274, 295, 296, 297, 298, 304, 306, 310, 317, 318, 319, 321, 323, 324, 329, 333, 335, 343, 344, 345, 347, 349, 352, 353, 354, 359, 367, 368, 370, 373, 376, 377, 379, 380, 382, 384, 386, 388, 392, 393, 399, 402, 403;

as shown on Exhibit A, and has either failed to respond to the tenders, issued reservation of rights letters or explicitly denied coverage as noted in Exhibit A. *See* Exhibit A.

9. On information and belief, Commercial Union/Armour Insurance Company issued written policies of insurance to RCBO under Policy No. EF 9334-001 for the policy period October 25, 1970 to October 26, 1972; Policy No. EF 9334-003 for the policy period October 26, 1972 to October 26, 1973; and Policy No. EF 9334-008 for the policy period October 26, 1973 to December 1, 1975. Commercial Union/Armour Insurance accepted the defense of some of the underlying cases but then reported that they had become insolvent. RCBO is informed and believes and thereon alleges that defendant, the CALIFORNIA INSURANCE GUARANTEE ASSOCIATION ("CIGA"), assumed the responsibilities of Commercial Union/Armour Insurance regarding the above-identified policies. CIGA, while not an insurer, is a statutory entity, created and existing pursuant to Article 14.2 of the California Insurance Code. CIGA is responsive to certain claims, including but not limited to the following claims:

- 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15,16, 17, 19, 22, 23, 25, 26, 27, 29, 30, 31, 33, 35, 36, 37, 39, 40, 41, 42, 43, 44, 45, 47, 49, 54, 58, 59, 60, 66, 67, 72, 76, 77, 80, 81, 82, 85, 87, 88, 94, 95, 96, 97, 99, 100, 101, 102, 103, 104, 105, 106, 110, 112, 113, 115, 117, 123, 126, 129, 131, 135, 136, 140, 143, 144, 145, 146, 151, 153, 158, 159, 160, 162, 163, 164, 165, 167, 173, 175, 178, 180, 181, 182, 184, 185, 186, 187, 188, 189, 190, 192, 195, 196, 199, 200, 201, 205, 206, 207, 209, 211, 213, 214, 215, 217, 218, 219, 220, 221, 222, 223, 229, 234, 235, 236, 237, 243, 246, 249, 251, 259, 260, 262, 265, 269, 270, 271, 273, 279, 293, 294, 295, 296, 297, 298, 302, 303, 304, 205, 306, 310, 315, 318, 320, 321, 322, 324, 325, 326, 327, 329, 330, 332, 333, 334, 335, 342, 343, 344, 346, 347, 348, 351, 353,

356, 361, 362, 365, 367, 368, 369, 373, 374, 375, 377, 378, 382, 384, 385, 388, 392, 394, 399, 401;

as shown on Exhibit A, and has either failed to respond to the tenders, issued reservation of rights letters or explicitly denied coverage as described in Ex. A. *See* Exhibit A.

10. PACIFIC, TRAVELERS, and CIGA will collectively be referred to herein as the "PRIMARY DEFENDANTS."

11. Defendant INSURANCE COMPANY OF NORTH AMERICA (herein "INA") is, on information and belief, a Delaware corporation which conducted business in this District. INA issued a written excess policy of insurance to RCBO under Policy No. XBC 24312 for the period October 25, 1966 to October 25, 1970. Specifically, INA is responsive to certain claims, including but not limited to the following claims:

- 15, 19, 23, 32, 39, 42, 43, 46, 48, 50, 52, 53, 57, 66, 68, 70, 74, 75, 77, 81, 83, 86, 87, 88, 90, 91, 98, 99, 101, 102, 103, 104, 105, 106, 107, 109, 110, 129, 139, 142, 145, 147, 150, 159, 160, 175, 179, 185, 186, 187, 188, 190, 195, 196, 202, 205, 206, 207, 211, 214, 215, 218, 220, 232, 234, 235, 238, 239, 245, 251, 252, 253, 257, 264, 265, 268, 270, 279, 282, 285, 293, 303, 308, 325, 328, 336, 342, 348, 358, 360, 369, 378, 381, 385;

as shown on Exhibit A, and has either failed to respond to the tenders, issued reservation of rights letters or explicitly denied coverage as described in Ex. A. *See* Exhibit A.

12. Defendant UNITED STATES FIRE INSURANCE is, on information and belief, a Delaware corporation which conducted business in this District (herein "US FIRE"). On information and belief, RCBO alleges that US FIRE issued a written policy of excess insurance to RCBO under Policy No. DCL 53 9820 for the period October 25, 1970 to October 25, 1971. Specifically, US FIRE is responsive to certain claims, including but not limited to the following claims:

- 14, 15, 23, 27, 39, 42, 43, 66, 77, 81, 87, 99, 100, 101, 102, 103, 104, 105, 106, 110, 112, 123, 129, 145, 146, 153, 159, 175, 184, 185, 186, 187, 188, 190, 195, 196, 206, 207, 211, 213, 214, 215, 217, 218, 220, 221, 234, 235, 236, 246, 251, 265, 270, 271, 279, 293, 303, 304, 315, 326, 334, 342, 348, 365, 369, 374, 378, 385;

as shown on Exhibit A, and has either failed to respond to the tenders, issued reservation of rights letters or explicitly denied coverage as described in Exhibit A. *See* Exhibit A.

13. Defendant WESTPORT INSURANCE CORPORATION is, on information and belief, a Delaware corporation which conducted business in this District (herein "WESTPORT"). On information and belief, RCBO alleges that WESTPORT issued a written policy of excess insurance to RCBO under Policy No. U10255 for the period October 26, 1971 to October 26, 1974. Specifically, WESTPORT is responsive to certain claims, including but not limited to the following claims:

- 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 14, 15, 16, 17, 19, 21, 22, 23, 25, 26, 28, 29, 30, 31, 33, 35, 36, 37, 40, 41, 42, 43, 44, 45, 47, 49, 54, 58, 59, 60, 66, 67, 72, 76, 77, 80, 81, 82, 83, 85, 87, 94, 95, 96, 97, 99, 100, 101, 102, 103, 104, 105, 106, 110, 112, 113, 115, 117, 123, 126, 129, 131, 135, 136, 143, 145, 146, 151, 153, 158, 159, 160, 162, 163, 164, 165, 167, 173, 175, 178, 180, 181, 182, 184, 185, 186, 187, 188, 190, 192, 196, 199, 200, 201, 205, 206, 207, 209, 211, 213, 215, 217, 218, 219, 221, 222, 223, 229, 235, 236, 243, 246, 251, 259, 260, 262, 265, 269, 270, 271, 273, 294, 295, 296, 297, 298, 302, 303, 304, 305, 315, 318, 320, 321, 233, 324, 325, 326, 327, 329, 330, 332, 333, 334, 335, 343, 344, 346, 347, 348, 351, 353, 356, 361, 362, 367, 368, 369, 374, 375, 377, 382, 384, 385, 392, 394, 399, 401;

as shown on Exhibit A, and has either failed to respond to the tenders, issued reservation of rights letters or explicitly denied coverage as described in Exhibit A. *See* Exhibit A.

14. Defendant CONTINENTAL CASUALTY COMPANY is, on information and belief, a Delaware corporation which conducted business in this District (herein "CONTINENTAL"). On information and belief, RCBO alleges that CONTINENTAL issued written policies of excess insurance to RCBO under Policy No. RDU 146 74 50 for the period October 26, 1974 to December 1, 1977 and Policy No. UMB 006 46 71 53 for the period December 1, 1977 to December 1, 1980. Specifically, CONTINENTAL is responsive to certain claims, including but not limited to the following claims:

- 1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 13, 15, 16, 17, 19, 20, 21, 22, 25, 26, 31, 33, 35, 40, 41, 42, 43, 44, 47, 49, 54, 56, 58, 59, 63, 71, 76, 80, 82, 85, 86, 88, 92, 95, 96, 97, 99, 101, 102,

103, 104, 105, 106, 110, 113, 115, 117, 121, 124, 126, 131, 132, 140, 143, 144, 149, 152, 154, 157, 158, 160, 162, 163, 164, 165, 166, 168, 172, 173, 174, 178, 180, 181, 182, 183, 189, 190, 191, 192, 193, 198, 200, 201, 203, 206, 207, 208, 209, 210, 211, 212, 213, 215, 216, 217, 223, 224, 225, 229, 230, 237, 243, 244, 247, 249, 250, 251, 256, 258, 259, 260, 266, 267, 269, 272, 273, 274, 295, 296, 297, 298, 302, 304, 305, 306, 310, 315, 317, 318, 319, 321, 323, 324, 325, 329, 333, 335, 343, 344, 345, 347, 349, 352, 353, 354, 359, 361, 367, 368, 370, 373, 376, 377, 379, 380, 382, 384, 386, 388, 392, 393, 399, 402, 403;

as shown on Exhibit A, and has either failed to respond to the tenders, issued reservation of rights letters or explicitly denied coverage as described in Exhibit A. *See* Exhibit A.

15. On information and belief, Industrial Indemnity issued a written policy of excess insurance to RCBO under Policy No. JU 8312510 for the period December 1, 1980 to December 1, 1981, and WESTCHESTER FIRE INSURANCE COMPANY assumed all the obligations under said policy (herein "WESTCHESTER"). Specifically, WESTCHESTER is responsive to certain claims, including but not limited to the following claims:

- 10, 19, 28, 33, 35, 61, 64, 104, 133, 140, 154, 157, 166, 180, 189, 191, 193, 194, 208, 212, 224, 225, 227, 244, 250, 251, 261, 267, 296, 317, 319, 352, 354, 367, 370, 373, 376;

as shown on Exhibit A, and has either failed to respond to the tenders, issued reservation of rights letters or explicitly denied coverage as described in Exhibit A. *See* Exhibit A.

16. On information and belief, CERTAIN UNDERWRITERS AT LLOYD'S, LONDON, SUBSCRIBING SEVERALLY AND NOT JOINTLY TO SLIP NOS. CU 1001 AND K 66034 ISSUED TO THE ROMAN CATHOLIC ARCHBISHOP OF SAN FRANCISCO, AND NOS. K 78138 AND CU 3061 ISSUED TO THE ROMAN CATHOLIC BISHOP OF OAKLAND ("LLOYD'S") issued written policies of excess insurance to RCBO under Policies No. CU 1001 for the period March 12, 1962 to October 25, 1963, and K 78131 for the period October 25, 1963 to October 25, 1966, and LLOYD'S assumed all the obligations under said policy. Specifically, LLOYD'S is responsive to certain claims, including but not limited to the following claims:

- 15, 30, 31, 42, 45, 48, 57, 65, 74, 75, 79, 98, 107, 109, 114, 119, 120 137, 142, 147, 150,

155, 176, 177, 185, 187, 197, 202, 204, 214, 233, 234, 239, 245, 248, 252, 257, 299, 307, 308, 328, 360, 381, 383, 391;

as shown on Exhibit A, and has either failed to respond to the tenders, issued reservation of rights letters or explicitly denied coverage as described in Exhibit A. *See* Exhibit A.

17. INA, US FIRE, WESTPORT, CONTINENTAL, WESTCHESTER, and LLOYD'S will collectively be referred to herein as the "EXCESS DEFENDANTS."

18. Defendant WESTPORT is, on information and belief, a Delaware corporation which conducted business in this District. On information and belief RCBO alleges that WESTPORT issued a written umbrella policy of insurance to RCBO under Policy No. PLE20430 for the period October 16, 1974 to October 16, 1977 (herein "WESTPORT UMBRELLA"). Specifically, WESTPORT UMBRELLA is responsive to certain claims, including but not limited to the following claims:

- 20, 21, 28, 83, 86, 88, 92, 121, 140, 144, 149, 174, 183, 189, 194, 198, 208, 216, 230, 249, 258, 266, 267, 274, 295, 306, 310, 323, 345, 349, 359, 373, 388, 393, 402;

as shown on Exhibit A, and has either failed to respond to the tenders, issued reservation of rights letters or explicitly denied coverage as described in Exhibit A. *See* Exhibit A.

19. Defendant TRAVELERS is, on information and belief, a Connecticut corporation which conducted business in this District. On information and belief RCBO alleges that TRAVELERS issued written umbrella polices of insurance to RCBO under Policy No. 05 XN 55 WCA for the period December 1, 1978 to December 1, 1981 and Policy No. 005 FF 1390 BCA for the period December 1, 1981 to December 1, 1987 (herein "TRAVELERS UMBRELLA"). Specifically, TRAVELERS UMBRELLA is responsive to certain claims, including but not limited to the following claims:

- 10, 12, 18, 21, 24, 29, 33, 35, 56, 61, 64, 71, 73, 82, 83, 86, 92, 95, 96, 97, 99, 101, 102, 103, 104, 105, 106, 110, 115, 117, 121, 124, 125, 126, 127, 128, 130, 131, 132, 133, 140, 141, 149, 152, 154, 156, 157, 158, 163, 166, 168, 171, 174, 180, 181, 183, 189, 191, 192, 193, 194, 198, 203, 206, 208, 210, 212, 216, 224, 225, 226, 227, 228, 230, 243, 244, 247, 250, 251, 256, 258, 261, 266, 267, 272, 273, 274, 296, 297, 298, 310, 314, 316, 317, 318, 319, 321, 323, 331, 338, 339, 345, 349, 350, 352, 354, 359, 363, 367, 370, 373, 376, 379,

380, 384, 386, 402, 403, 407;

as shown on Exhibit A, and has either failed to respond to the tenders, issued reservation of rights letters or explicitly denied coverage as described in Exhibit A. *See* Exhibit A.

20. Defendant PACIFIC EMPLOYERS INSURANCE is, on information and belief, a Delaware corporation which conducted business in this District. On information and belief RCBO alleges that PACIFIC EMPLOYERS INSURANCE issued a written umbrella policy of insurance to RCBO under Policy No. XCC 01 2405 for the period March 13, 1985 to December 1, 1985 (herein "PACIFIC EMPLOYERS UMBRELLA"). Specifically, PACIFIC EMPLOYERS UMBRELLA is responsive to certain claims, including but not limited to the following claim:

- 12, 51, 73, 80, 118, 127, 130, 141, 171, 225, 228, 254, 314, 338, 339, 350, 363, 407;

as shown on Exhibit A, and has either failed to respond to the tenders, issued reservation of rights letters or explicitly denied coverage as described in Exhibit A. *See* Exhibit A.

21. On information and belief, LLOYD'S issued written policies of umbrella insurance to RCBO under Policies No. K 66034 for the period March 12, 1962 to October 25, 1963, and CU 3061 for the period October 25, 1963 to October 25, 1966 (herein "LLOYD'S UMBRELLA"). LLOYD'S UMBRELLA assumed all the obligations under said policy. Specifically, LLOYD'S UMBRELLA is responsive to certain claims, including but not limited to the following claims:

- 15, 30, 31, 42, 45, 48, 57, 65, 74, 75, 79, 98, 107, 109, 114, 119, 120 137, 142, 147, 150, 155, 176, 177, 185, 187, 197, 202, 204, 214, 233, 234, 239, 245, 248, 252, 257, 299, 307, 308, 328, 360, 381, 383, 391;

as shown on Exhibit A, and has either failed to respond to the tenders, issued reservation of rights letters or explicitly denied coverage as described in Exhibit A. *See* Exhibit A

22. WESTPORT UMBRELLA, TRAVELERS UMBRELLA, PACIFIC EMPLOYERS UMBRELLA, and LLOYD'S UMBRELLA will collectively be referred to herein as the "UMBRELLA DEFENDANTS."

FACTUAL BACKGROUND

23. On June 22, 2023, the Debtor filed the First Amended Complaint for declaratory relief and breach of contract, seeking to liquidate the Debtor's claims against numerous of its historical insurance carriers. [Docket No. 2 with attached Exhibit and Attachment (collectively, the "First Amended Complaint")]. On December 18, 2023, the Debtor filed the Second Amended Complaint for declaratory relief, breach of contract, and breach of statutory duty to address issues raised in various motions to dismiss, per the Court's order. RCBO incorporates herein its First Amended Complaint and Second Amended Complaint.

24. The Debtor files this Third Amended Complaint to include additional insurers that it alleges are liable to provide indemnity and/or defense of the underlying complaints.

25. RCBO has been named in more than 400 complaints primarily filed in the Alameda Superior Court as well as proofs of claim filed in this Court seeking recovery for alleged negligent supervision and hiring of certain clerical and ministerial personnel over a period of decades. These suits and proofs of claim (collectively referred to as the "Suits") have been filed as a result of California's passing of AB 218, which extended the statute of limitations for the filing of similar civil suits.

26. Although section 362 of the Bankruptcy Code provides for an automatic stay of the Suits and of additional lawsuits against the Debtor, RCBO is informed, and believes, that additional suits may be filed and/or served after the filing of this proceeding and RCBO will update the list as reflected in Exhibit A to reflect all such cases as appropriate.

27. RCBO has maintained insurance coverage through a series of primary, excess, and umbrella insurers from the early 1960's through the present time as alleged above.

28. RCBO has tendered through its broker (*i.e.*, "AJG" as designated in Exhibit A) both RCBO's defense and indemnity of the Suits under all applicable insurance policies to the associated Defendants that issued those policies and were not insolvent.

29. The PRIMARY DEFENDANTS received the tenders of the Suits on behalf of RCBO but have improperly denied or failed to confirm coverage and/or provide defense and/or indemnity to RCBO for the Suits as reflected in Exhibit A. Further those PRIMARY DEFENDANTS who did accept RCBO's

tender did so while refusing to pay full defense rates or requiring an agreement to a reduction of rates for defense notwithstanding the complexity of the cases and/or issued onerous guidelines which were not part of the applicable policies. RCBO contends that it is entitled to the payment of defense and/or indemnity amounts from each of the PRIMARY DEFENDANTS on the grounds that RCBO timely tendered the Suits to the PRIMARY DEFENDANTS and has met all the conditions of the respective policies of insurance. RCBO further asserts that the Suits seek recovery for claims of "bodily injury" as that term is defined in the PRIMARY DEFENDANTS' respective policies of insurance and therefore the claims come within the coverage grant of the respective insurance policies. Further, RCBO contends that the claims made in the Suits are not excluded by the respective insurance policies. Further, without limitation, RCBO contends that it did not intend nor know of any of the alleged events in the Suits such that it would result in the negation of coverage under the applicable policies. Therefore, the PRIMARY DEFENDANTS owe RCBO both defense and indemnity for the Suits.

30. The EXCESS DEFENDANTS received the tenders of the Suits on behalf of RCBO but have improperly denied or failed to confirm coverage (including, without limitation, failure to provide both defense and/or indemnity) for the Suits as reflected in Exhibit A – including failure to recognize the exhaustion of underlying insurance through payment, liquidation or other means thereby requiring the excess insurance to drop down and provide defense and indemnity to RCBO for the Suits. RCBO contends that it is entitled to the payment of defense and/or indemnity amounts from each of the EXCESS DEFENDANTS on the grounds that RCBO timely tendered the Suits to the EXCESS DEFENDANTS and has met all the conditions of the respective policies of insurance. RCBO further asserts that the Suits seek recovery for claims of "bodily injury" as that term is defined in the EXCESS DEFENDANTS' respective policies of insurance and therefore the claims come within the coverage grant of the respective insurance policies. Further, RCBO contends that the claims made in the Suits are not excluded by the respective insurance policies. In addition, without limitation, RCBO contends that it did not intend nor know of any of the alleged events in the Suits such that it would result in the negation of coverage under the applicable policies. Finally, RCBO contends that it is presently facing in excess of 400 Suits seeking a total amount of damages which has the substantial likelihood of being in excess of the available limits

of insurance available under the PRIMARY DEFENDANTS', EXCESS DEFEDENDANTS', and UMBRELLA DEFENDANTS' respective insurance policies. Therefore, the EXCESS DEFENDANTS owe RCBO both defense and indemnity for the Suits.

31. The UMBRELLA DEFENDANTS received the tenders of the Suits on behalf of RCBO but have improperly denied or failed to confirm coverage (including, without limitation, failure to provide both defense and/or indemnity) for the Suits as reflected in Exhibit A - including failure to recognize the exhaustion of underlying primary and excess insurance through payment, liquidation or other means thereby requiring the umbrella insurance to drop down and provide defense and indemnity to RCBO for the Suits. RCBO contends that it is entitled to the payment of defense and/or indemnity amounts from each of the UMBRELLA DEFENDANTS on the grounds that RCBO timely tendered the Suits to the UMBRELLA DEFENDANTS and has met all the conditions of the respective policies of insurance. RCBO further asserts that the Suits seek recovery for claims of "bodily injury" as that term is defined in the UMBRELLA DEFENDANTS' respective policies of insurance and therefore the claims come within the coverage grant of the respective insurance policies. Further, RCBO contends that the claims made in the Suits are not excluded by the respective insurance policies. In addition, without limitation, RCBO contends that it did not intend nor know of any of the alleged events in the Suits such that it would result in the negation of coverage under the applicable policies. Finally, RCBO contends that it is presently facing in excess of 400 Suits seeking a total amount of damages which has the substantial likelihood of being in excess of the available limits of insurance available under the PRIMARY DEFENDANTS', EXCESS DEFEDENDANTS', and UMBRELLA DEFENDANTS' respective insurance policies. Therefore, the UMBRELLA DEFENDANTS owe RCBO both defense and indemnity for the Suits.

32. As a result of the conduct of the PRIMARY DEFENDANTS, EXCESS DEFENDANTS, and UMBRELLA DEFENDANTS, RCBO has been harmed in that it has not been provided with the benefits of the insurance it purchased, having complied with all requirements thereunder. RCBO has been forced to defend itself against the Suits without being provided with the appropriate required defense (including full payment of defense amounts expended) and indemnity that was to be provided by the PRIMARY DEFENDANTS, EXCESS DEFENDANTS, and UMBRELLA DEFENDANTS through their

respective policies of insurance. Consequently, an actual and justiciable controversy exists between the parties of sufficient immediacy and reality to warrant issuance of a declaratory judgment.

FIRST CAUSE OF ACTION

(Declaratory Relief Against All Defendants)

33. RCBO realleges and incorporates herein paragraphs 1 through 32 of this complaint as if said paragraphs were set forth in full.

34. To state a claim for a declaratory judgment, a party needs to plead an actual controversy. 28 U.S.C. § 2201; Cal. Code. Civ. P. § 1060; *see also, e.g.*, *Marks v. UMG Recordings, Inc.*, 2023 WL 4532774, at *3 n.2 (9th Cir. July 13, 2023) (acknowledging that "California law unambiguously provides a claim for declaratory relief when there is an actual controversy about the parties' rights and duties under a contract").

35. An actual and justiciable controversy has arisen and now exists between the parties with respect to whether the Defendants, and each of them, are obligated to provide RCBO with defense and indemnity under their respective insurance policies regarding the Suits.

36. Pursuant to the respective insurance policies (and, in the case of CIGA, its statutory obligations), each of the Defendants is obligated to pay in full the expenditures made by RCBO to defend itself against the Suits.

37. The insurance policies RCBO purchased from various insurance carriers provide coverage for many if not all of the Suits asserted against RCBO and constitute the most significant source of recovery for the alleged abuse victims in the Bankruptcy Case.

38. Pursuant to the terms of the respective insurance policies, each of the Defendants is obligated to defend and indemnify RCBO for, or pay on its behalf, all sums that RCBO becomes obligated to pay, through judgment, settlement, or otherwise, arising out of the Suits.

39. RCBO has fully performed under the Defendants' respective insurance policies.

40. The PRIMARY DEFENDANTS have received tenders on behalf of RCBO regarding the Suits but have improperly denied and/or have failed to confirm coverage for the Suits and have further failed to provide RCBO with either defense and/or indemnity regarding the Suits as required under the

respective policies. *See* Exhibit A. To the extent that the PRIMARY DEFENDANTS have issued reservation of rights letters in response to RCBO's tenders (as reflected in Exhibit A), the PRIMARY DEFENDANTS have not actually provided the benefits of their respective policies to RCBO – *i.e.*, actual defense and/or indemnity payments. Finally, in the case of CIGA, RCBO submitted a timely proof of claim to CIGA regarding the applicable Suits and CIGA has failed to meet its statutory obligations to provide available sums in response to the Suits.

41. The EXCESS DEFENDANTS have received tenders on behalf of RCBO regarding the Suits but have improperly denied and/or have failed to confirm coverage for the Suits and have further failed to confirm that any underlying insurance has been exhausted whether by payment, liquidation or otherwise and contrary to the coverages promised to RCBO and thus have failed to provide RCBO with either defense and/or indemnity regarding the Suits as required under the respective policies. *See* Exhibit A. To the extent that the EXCESS DEFENDANTS have issued reservation of rights letters in response to RCBO's tenders (as reflected in Exhibit A), the EXCESS DEFENDANTS have not actually provided the benefits of their respective policies to RCBO – *i.e.*, actual defense and/or indemnity payments. Further the EXCESS DEFENDANTS have not acknowledged that their insured, RCBO, faces covered claims in excess of the limits of insurance available from the PRIMARY DEFENDANTS' respective policies which would, in turn, trigger EXCESS DEFENDANTS' obligations to provide the benefits of their respective policies to RCBO.

42. The UMBRELLA DEFENDANTS have received tenders on behalf of RCBO regarding the Suits but have improperly denied and/or have failed to confirm coverage for the Suits and have further failed to confirm that any underlying insurance has been exhausted whether by payment, liquidation or otherwise and contrary to the coverages promised to RCBO and thus have failed to provide RCBO with either defense and/or indemnity regarding the Suits as required under the respective policies. *See* Exhibit A. To the extent that the UMBRELLA DEFENDANTS have issued reservation of rights letters in response to RCBO's tenders (as reflected in Exhibit A), the UMBRELLA DEFENDANTS have not actually provided the benefits of their respective policies to RCBO – *i.e.*, actual defense and/or indemnity payments. Further the UMBRELLA DEFENDANTS have not acknowledged that their insured, RCBO,

faces covered claims in excess of the limits of insurance available from the PRIMARY and EXCESS DEFENDANTS' respective policies which would, in turn, trigger UMBRELLA DEFENDANTS' obligations to provide the benefits of their respective policies to RCBO.

43. Each of the Defendant's refusal to defend and/or indemnify RCBO constitutes a breach of the insurance policies or, in the case of CIGA, a breach of its statutory duties.

44. In the meantime, the Suits are pending, resulting in loss and damages to RCBO including, without limitation, defense fees and costs and indemnity funds (whether via judgment or settlement or other means).

45. An actual controversy of a justiciable nature presently exists between RCBO and the Defendants concerning the proper construction of the respective insurance policies, the scope of the statutory obligations assumed by CIGA, and the rights and obligations of the parties with respect to the Suits. The controversy is of sufficient immediacy and magnitude to justify the issuance of a declaratory judgment.

46. RCBO is entitled to a judgment declaring that the Defendants have issued insurance policies to RCBO and that RCBO is entitled to both defense and indemnity regarding the Suits under the respective policies of insurance issued by the Defendants including, without limitation, a declaration of exhaustion as to certain underlying policies and the requirement that the EXCESS DEFENDANTS and/or UMBRELLA DEFENDANTS drop down to provide defense and indemnity to RCBO regarding the Suits. In the case of CIGA, RCBO is entitled to a judgment declaring that CIGA is statutorily obligated to provide funds to RCBO in response to the claims made in the Suits to which it must respond (as reflected in Exhibit A).

SECOND CAUSE OF ACTION

(Breach of Contract Against All Defendants Except for CIGA)

47. RCBO realleges and incorporates herein paragraphs 1 through 46 of this complaint as if said paragraphs were set forth in full.

48. "An insured can pursue a breach of contract theory against its insurer by alleging [1] the insurance contract, [2] the insured's performance or excuse for nonperformance, [3] the insurer's breach,

and [4] resulting damages." *San Diego Housing Comm'n v. Indus. Indem. Co.*, 68 Cal. App. 4th 526, 536 (1998).

49. The respective Defendants' policies are valid and enforceable contracts providing insurance coverage for the damage incurred by RCBO.

50. The respective Defendants have received timely tenders of the Suits. *See* Exhibit A.

51. The Defendants' failure to provide defense and indemnity to RCBO for the Suits is contrary to the coverages and benefits promised RCBO under the respective policies and constitutes a breach of those policies. Said breach includes the failure to pay the full amount of defense fees and costs expended the institution of billing and defense "guidelines" not included with the terms of the applicable policies.

52. RCBO has fully performed under the Defendants' respective insurance policies and the Defendants, and each of them, are not excused from performance.

53. As a direct and proximate result of the Defendants' breaches, RCBO has been damaged according to proof at trial.

54. As a result of the Defendants' breaches of their respective insurance policies, RCBO has incurred significant fees and costs in defending itself in the Suits and has not been provided with the required coverage for indemnity (including any settlement amounts), all to the injury and damage of RCBO.

55. Furthermore, the Defendants' refusal to provide the promised coverage hampers the Debtor's ability to propose and implement a confirmable plan of reorganization.

THIRD CAUSE OF ACTION

(Breach of Statutory Duty Against CIGA)

56. RCBO realleges and incorporates herein paragraphs 1 through 55 of this complaint as if said paragraphs were set forth in full.

57. "CIGA's authority and liability are limited to paying 'covered claims.'" *Cal. Ins. Guarantee Ass'n v. Workers' Comp. Appeals Bd.*, 128 Cal. App. 4th 307, 313, 26 Cal. Rptr. 3d 845, 848 (2005).

58. A covered claims means "(1) … the obligations of an insolvent insurer, including the obligation … (i) imposed by law and within the coverage of an insurance policy of the insolvent insurer; (ii) which were unpaid by the insolvent insurer; … (iv) which were incurred prior to the date coverage under the policy terminated …" *Cal. Ins. Guarantee Ass'n v. Workers' Comp. Appeals Bd.*, 153 Cal. App. 4th 524, 532-33, 62 Cal. Rptr. 3d 855, 860 (2007) (citing (Ins. Code, § 1063.1, subd. (c)(1))).

59. Commercial Union/Armour Insurance Company has become insolvent but had acknowledged potential coverage for the Suits tendered to it by RCBO.

60. RCBO timely presented the claims to the liquidator prior to the date coverage under the policy terminated. Therefore, the claims qualify as covered claim under the statute.

61. CIGA assigned an adjuster to review the claims. CIGA confirmed that RCBO appropriately filed the claims, and CIGA understood that the claims were abuse-related claims.

62. As a result of CIGA's breaches, RCBO has been damaged according to proof at trial.

PRAYER FOR RELIEF

WHEREFORE, RCBO prays for relief as follows:

a. For a declaration in RCBO's favor as to the obligation of the insurer Defendants, and each of them, that the Defendants issued effective policies of insurance to RCBO and a further declaration that the Defendants were obligated to provide defense and indemnity to RCBO regarding the claims made in the Suits;

b. For a declaration in RCBO's favor as to the obligation of CIGA, that CIGA was statutorily obligated to provide defense and/or indemnity funds to RCBO regarding the claims made in the Suits;

c. For an award in RCBO's favor as a result of the Defendants' breach of their respective policies;

d. For an award in RCBO's favor as a result of CIGA's breach of its statutory duty;

e. For an order awarding RCBO its costs, expenses, and reasonable attorneys' fees as provided by law; and

f. For such other and further relief as the Court deems just and proper

DATED: JANUARY 12, 2024

FOLEY & LARDNER LLP
Eileen R. Ridley
Ann Marie Uetz
Thomas F. Carlucci
Matthew D. Lee

/s/ Eileen R. Ridley

EILEEN R. RIDLEY
COUNSEL FOR THE DEBTOR
THE ROMAN CATHOLIC BISHOP OF OAKLAND

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
1	370 363	RG19041044	1971-1974	CNA denial 1/6/21 Lloyd's denial 11/29/23	3/20/2020	Onebeacon/ Armour (Commerical Union) 3/25/2020 Swiss Re 3/25/20 (Emp. Reins.) CNA 3/25/20 AIG (Am. Home) 3/25/20 Chub 3/25/20
2	426	HG20053992	1973-1978	CNA denial 1/6/21 Chubb ack. 6/10/20 Lloyd's denial 11/29/23	3/20/2020	Onebeacon (Commercial Union) 3/25/2020 Swiss Re (Emp. Reins.) 3/25/20 CNA 3/25/20 AIG (Am. Home) 3/25/20
3	97	HG20053951	1972-1975	CNA denial 1/6/21 Chubb denial 6/10/20 Lloyd's denial 11/29/23	3/20/2020	Onebeacon (Commercial Union) 3/25/2020 Swiss Re (Emp. Reins.) 3/25/20 CNA 3/25/20 AIG (Am. Home) 3/25/20
4	102	HG20053984	1972-1975	CNA denial 1/6/21 Chubb denial 6/10/20 Lloyd's denial 11/29/23	3/20/2020	Onebeacon (Commercial Union) 3/25/2020 Swiss Re (Emp. Reins.) 3/25/20 CNA 3/25/20 AIG (Am. Home) 3/25/20
5	73	21CV000055	1973-1974	CNA ack/ROR 7/15/22 AIG ack/ROR 7/19/22 Lloyd's denial 11/29/23 Westport ack/ROR 12/27/23	7/5/2022	Intact 7/6/22 OneBeacon 7/6/22 Swiss Re 7/6/22 Travelers 7/6/22 AIG 7/6/22 CNA 7/6/22
6	96	RG20057425	1972-1974	AIG ack/ROR 2/25/21 Travelers ack. 12/18/2020 CNA denial 1/6/21 Westport ack. 7/17/20 Lloyd's denial 11/29/23	6/12/2020	OneBeacon/ Commercial Union (Armour Risk) 6/17/20 Travelers 6/17/2020 Swiss Re (Emp. Reins.) 6/17/2020 CNA 6/17/20 AIG 6/17/20
7	63	HG19048685	1975-1977	AIG ack/ROR 2/25/21	6/12/2020	AIG 6/17/20

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Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
				Travelers ack/ROR 12/18/20 - agreement CNA denial 1/6/21 Chubb denial 6/22/23 Westport ack.7/17/20 Lloyd's denial 11/29/23		CNA 6/17/20 SwissRe (ER Re) 6/17/2020 Travelers 6/17/20 Onebeacon (Armour Risk) 6/17/2020
8	105	HG20053989	1972-1975	AIG ack/ROR 2/25/21 Travelers ack. 12/18/2020 Chubb ack. 6/30/20 Westport ack. 7/17/20 Lloyd's denial 11/29/23	6/12/2020	OneBeacon/ Armour (Commercial Union) 6/12/2020 Chubb 6/16/20 Swiss Re (E. Re) 6/16/2020 CNA 6/16/2020 AIG 6/16/20 Travelers 6/16/20
9	169	HG20053924	1972-1975	AIG ack/ROR 2/25/21 Travelers ack. 12/18/2020 CNA denial 1/6/21 Westport ack. 7/17/20	6/12/2020	OneBeacon/ Armour (Commercial Union) 6/17/20 Travelers 6/17/20 Swiss Re (ER Re) 6/17/20 CNA 6/17/20 AIG 6/17/20
10	94	RG20057493	1970-1981	AIG ack/ROR 2/25/21 CNA denial 1/6/21 Chubb ack. 6/22/23 Westport ack. 7/17/20 Travelers agreement Lloyd's denial 11/29/23	6/12/2020	OneBeacon/ Armour (Commercial Union) 6/16/20 Travelers 6/16/20 Chubb 6/16/20 Swiss Re (ER Re) 6/16/20 CNA 6/16/20 Am. Home (AIG) 6/16/20
11	95	HG20053983	1972-1975	AIG ack/ROR 2/25/21 CNA denial 1/6/21 Westport ack. 7/17/20 Lloyd's denial 11/29/23	6/12/2020	Am. Home (AIG) 6/16/20 CNA 6/17/20 Swiss Re (ER Re) 6/17/2020 Travelers 6/17/20 OneBeacon/ Armour (Commercial Union) 6/17/20
12	258	HG20055763	1984-1986	Travelers ack. 12/18/2020 Lloyd's denial 11/29/23	6/12/2020	Travelers 6/17/20

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Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
						OneBeacon/ Armour (Commercial Union) 6/17/20
13	339	HG19042086	1975-1977	AIG ack/ROR 2/25/21 Travelers ack 12/18/20/agreement CNA denial 1/6/21 Chubb denial 6/22/23 Lloyd's denial 11/29/23	8/3/2020	AIG 8/6/2020 Travelers 8/6/2020 Chubb 8/6/2020 Swiss Re 8/6/2020 Armour Risk 8/6/20
14	81	RG20048852	1971-1972	AIG ack/ROR 2/25/21 Travelers ack. 12/18/2020 CNA denial 1/6/21 Chubb ack 8/10/2020/agreement Lloyd's denial 11/29/23	8/3/2020	AIG 8/6/2020 Travelers 8/6/2020 Chubb 8/6/2020 Swiss Re 8/6/2020 Armour Risk 8/6/20
15	128 148 158	RG19039073	1969-1975 1960-1967 1971-1974	AIG ack/ROR 2/25/21 Travelers ack. 12/18/2020 CNA denial 1/6/21 Chubb ack 8/10/2020/agreement Lloyd's ack/ROR 11/29/23	8/3/2020	AIG 8/6/2020 Travelers 8/6/2020 Chubb 8/6/2020 Swiss Re 8/6/2020 Armour Risk 8/6/20
16	99	HG19048691	1975-1976	AIG ack/ROR 2/25/21 Travelers ack 12/18/20/agreement CNA denial 1/6/21 Chubb ack. 8/10/2020 Lloyd's ack/ROR 11/29/23	8/3/2020	AIG 8/6/2020 Travelers 8/6/2020 Chubb 8/6/2020 Swiss Re 8/6/2020 OneBeacon/ Armour Risk 8/6/20
17	236	RG20061260	1972-1975	AIG ack/ROR 2/25/21 Travelers ack 12/18/2020/agreement CNA denial 1/6/21 Chubb ack. 8/10/2020 Lloyd's denial 11/29/23	8/3/2020	AIG 8/6/2020 Travelers 8/6/2020 Chubb 8/6/2020 Swiss Re 8/6/2020 Armour Risk 8/6/20

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Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
18	341	RG20064221	1986-87	AIG ack/ROR 2/25/21 Travelers ack/ROR. 8/2/23 CNA denial 1/6/21 Chubb denial 9/14/20 Lloyd's denial 11/29/23	8/3/2020	Armour Risk 8/6/20 CNA 8/6/2020 Swiss Re 8/6/2020 AIG 8/6/2020 Travelers 8/6/2020 Chubb 8/6/2020
19	465 385 386	RG20056258	1970-1974 1977 1981	AIG ack/ROR 2/25/21 Travelers ack 12/18/20/agreement CNA denial 1/6/21 Chubb ack 8/10/20/agreement Lloyd's denial 11/29/23	8/3/2020	AIG 8/6/2020 Travelers 8/6/2020 Chubb 8/6/2020 Swiss Re 8/6/2020 Armour Risk 8/6/20
20	40	RG20066518	"Late 1970's" or 1976-1977	AIG ack/ROR 2/25/21 Travelers ack 12/18/20 - agreement Chubb denial 6/22/23 Lloyd's denial 11/29/23	8/3/2020	Travelers 8/6/2020 Chubb 8/6/2020 Swiss Re 8/6/2020 AIG 8/6/2020
21	48	RG20067225	1979-1983	AIG ack/ROR 2/25/21 Travelers ack 12/18/20 - agreement Chubb denial 9/14/20 Lloyd's denial 11/29/23	8/3/2020	Travelers 8/6/2020 Chubb 8/6/2020 Swiss Re 8/6/2020 AIG 8/6/2020
22	107 123	RG20065425	1973-1975	AIG ack/ROR 2/25/21 Travelers ack 12/18/20 - agreement CNA denial 1/6/21 Chubb denial 9/9/20 Lloyd's denial 11/29/23 Westport ack/ROR 12/27/23	8/3/2020	Armour Risk 8/6/20 CNA 8/6/2020 Swiss Re 8/6/2020 AIG 8/6/2020 Travelers 8/6/2020 Chubb 8/6/2020
23	275	RG20065264	1969-1972	AIG ack/ROR 2/25/21	8/3/2020	Armour Risk 8/6/20

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
	272			Travelers ack. 12/18/2020 CNA denial 1/6/21 Chubb ack 8/10/20 - agreement Lloyd's denial 11/29/23		CNA 8/6/2020 Swiss Re 8/6/2020 AIG 8/6/2020 Travelers 8/6/2020 Chubb 8/6/2020
24	388	RG20061429	1986-1989	AIG ack/ROR 2/25/21 Travelers ack. 12/18/2020 CNA denial 1/6/21 Chubb denial 9/14/20 Lloyd's denial 11/29/23	8/3/2020	Armour Risk 8/6/20 CNA 8/6/2020 Swiss Re 8/6/2020 AIG 8/6/2020 Travelers 8/6/2020 Chubb 8/6/2020
25	111 125	RG20065437	1973-1975	AIG ack/ROR 2/25/21 Travelers ack/ROR 12/18/20 - agreement CNA denial 1/6/21 Chubb denial 9/9/20 Lloyd's denial 11/29/23	8/3/2020	Armour Risk 8/6/20 CNA 8/6/2020 Swiss Re 8/6/2020 AIG 8/6/2020 Travelers 8/6/2020 Chubb 8/6/2020
26	109 124	RG20065435	1973-1975	AIG-ack/ ROR/investigation 2/25/21 Travelers ack/ROR 12/18/20 - agreement CNA-prelim denial subject to evidence 1/6/21 Chubb denial 9/9/20 Lloyd's denial 11/29/23	8/3/2020	Onebeacon/ Armour (Commercial Union) 6/16/2020 Aetna/ Travelers 6/16/2020 CNA 8/6/2020 Swiss Re 8/6/2020 AIG 8/6/2020 Chubb 8/6/2020
27	378	RG20064084	1971	AIG ack/ ROR 8/2/23 Travelers ack. 12/18/2020	8/3/2020	Armour Risk 8/6/20 CNA 8/6/2020

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Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
				CNA-prelim denial subject to evidence 1/6/21 Chubb ROR 9/14/20/ agreement Lloyd's denial 11/29/23 Westport ack/ROR 12/27/23		Swiss Re 8/6/2020 AIG 8/6/2020 Travelers 8/6/2020 Chubb 8/6/2020
28	389	RG20056654	1972-1975	AIG-ack/ ROR/investigation 2/25/21 Travelers ack/ROR 12/18/20 - agreement Chubb ack/ROR 8/10/20 agreement Lloyd's denial 11/29/23	8/3/2020	Travelers 8/6/2020 Chubb 8/6/2020 Swiss Re 8/6/2020 AIG 8/6/2020
29	65	RG20067602	1975-1979	AIG-ack/ ROR/investigation 2/25/21 Travelers ack/ROR 12/18/20 - agreement Chubb denial 6/22/23 Lloyd's denial 11/29/23	8/3/2020	Travelers 8/6/2020 Chubb 8/6/2020 Swiss Re 8/6/2020 AIG 8/6/2020 Armour Risk 8/6/20
30	408	RG20064685	1966-1975	Travelers denial 12/18/20 Chubb denial 6/22/23 Lloyd's denial 11/29/23	8/25/2020	AIG 12/16/20
31	448	RG20064759	1966-1976	AIG – ack/ROR-denied under Lexington policy, investigating under Am. Home policy – 3/9/22 Chubb denial 6/22/23 Travelers agreement Lloyd's denial 11/29/23	8/25/2020	
32	80	RG20049371	1968-1969	AIG denial 3/7/22 Travelers denial 12/18/20 Chubb agreement Lloyd's denial 11/29/23	9/8/2020	AIG 9/8/20
33	104	RG20073791	1972-1975	AIG denial 3/7/22 Travelers agreement Lloyd's denial 11/29/23	9/22/2020	Armour Risk 12/16/20 AIG 12/16/20

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Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
34	392 390 478	RG20075233	1972-1975	Lloyd's preliminary denial 11/29/23	10/2/2020	Armour Risk 10/2/20
35	103	RG20079359	1972-1980	AIG denial 3/9/22 Travelers agreement Chubb denial 6/22/23 Lloyd's denial 11/29/23	11/19/2020	Swiss Re 12/16/20 Travelers 12/16/20 AIG 12/16/20 Chubb 12/16/20 CNA 12/16/20
36	184	RG20075700	1972-1973	Travelers issued denial-12/18/2020 Chubb denial 1/26/21 Lloyd's denial 11/29/23	12/8/2020	Armour Risk 12/7/20 Swiss Re 12/16/20 Travelers 12/16/20 AIG 12/16/20 Chubb 12/16/20 CNA 12/16/20
37	279	RG21087706	1972-1974	AIG denial 3/8/22 Lloyd's denial 11/29/23	12/19/2020	CNA 12/18/20 CNA 3/18/21 OneBeacon 3/18/21 Swiss Re 3/18/21 AIG 3/18/21
38	62	RG20078903	Dec-94	AIG issued ack/prelim ROR 9/8/2020 Travelers ack. 12/18/2020 Lloyd's denial 11/29/23 CNA denial pending further evidence – 1/6/21 Chubb denial 9/14/20	8/3/2020	AIG 8/6/2020 Travelers 8/6/2020 Chubb 8/6/2020 Swiss Re 8/6/2020
39	250	RG20074690	1967-1971	Chubb agreement Lloyd's denial 11/29/23	2/17/2021	OneBeacon 3/18/21 Swiss Re 3/18/21 Chubb 3/18/21 AIG 3/18/21
40	517	RG20068095	1975-1976	Travelers agreement Lloyd's denial 11/29/23	3/1/2021	OneBeacon 3/18/2021 Swiss Re 3/18/2021

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Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
						Travelers 3/18/2021 CNA 3/18/2021
41	241	RG20085048	1972-1975	Nationwide issued denial- 3/9/22 Allied ack/ROR 11/23/21 Lloyd's denial 11/29/23 Chubb ack 1/8/24	3/15/2021	CNA 11/23/21 Nationwide 11/23/21 Chubb 11/23/21 TNC 11/23/21 K&K 11/23/21 AWAC 11/23/21 Liberty 11/23/21
42	473	RG20068867	1966-1973	Lloyd's denial 11/29/23	3/15/2021	CNA 11/23/21 Nationwide 11/23/21 K&K 11/23/21 AWAC 11/23/21 Liberty 11/23/21 TNC 11/23/21 Chubb 11/23/21
43	43	RG20075018	1968-1969	Chubb denial 6/22/23 Lloyd's denial 11/29/23	3/16/2021	OneBeacon 3/22/21 Swiss Re 3/22/21 Travelers 3/22/21 CNA 3/22/21 Chubb 3/22/21
44	259	RG21086498	1973-1974	Nationwide issued denial- 3/9/22 Lloyd's denial 11/29/23	7/7/2021	AWAC 11/23/21 CNA 11/23/21 Nationwide 11/23/21 K&K 11/23/21 AWC 11/23/21 Liberty 11/23/21 TNC 11/23/21

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Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
						Chubb 11/23/21
45	483	RG21096482	1959-1964	Nationwide issued denial- 3/9/22 Lloyd's denial 11/29/23 Lloyd's ack/ROR 11/29/23	7/7/2021	CNA 11/23/21 Chubb 11/23/21 Nationwide 11/23/21 AWAC 11/23/21 Liberty IU 11/23/21 TNCRRG 11/23/21
46	355 66	CIVMSC21-01242	1969	AIG denial 9/29/23 Lloyd's denial 11/29/23	7/20/2021	Swiss Re 8/12/21 OneBeacon 8/12/21 CNA 8/12/21 AIG 8/12/21
47	387	RG21105426	Oct 1972 – Feb 1974	Nationwide issued denial- 3/9/22	7/26/2021	CNA 11/23/21 Chubb 11/23/21 Nationwide 11/23/21 K&K 11/23/21 AWAC 11/23/21 Liberty IU 11/23/21 TNCRRG 11/23/21
48	61	RG21105583	1964-1968	Chubb agreement Lloyd's ack/ROR 11/29/23 Westport ack/ROR 12/27/23	9/8/2021	Chubb 12/6/21 Swiss Re 12/6/21
49	260	RG21110490	1973	Lloyd's ack/ROR 11/29/23 Westport ack/ROR 12/27/23	9/8/2021	OneBeacon 12/8/21 Swiss Re 12/8/21 AIG 12/8/21 CNA 12/8/21
50	46	RG20069692	1970-1971	Chubb ack/ROR 12/9/21 - agreement AIG ack/ROR 3/8/22 Lloyd's denial 11/29/23	12/27/2021	Intact 12/28/21 Swiss Re 12/28/21 AIG 12/28/21

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Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
						CNA 12/28/21 Chubb 12/28/21
51	382	CGC-20-584124	1984-1989	Travelers denial 1/6/22 Lloyd's denial 11/29/23	12/27/2021	Travelers 12/28/21 Ordinary Mutual 12/28/21
52	474	21CV002646	1968-1969	Chubb agreement Lloyd's denial 11/29/23	12/27/2021	Chubb 12/28/21
53	484	21CV003945	1960-1961	Chubb agreement Lloyd's denial 11/29/23	1/19/2022	Chubb 1/27/22
54	392	22CV004880	1972-1975	Travelers ack. 12/18/2020 CNA denial 2/8/22 Lloyd's preliminary denial 11/29/23	1/19/2022 3/20/2020	Onebeacon (Commercial Union) 3/25/2020 1/27/2022 Swiss Re (Emp Reins.) 3/25/2020 CNA 3/25/20 AIG (Am. Home) 3/25/20
55	360	C22-00044	1990	CNA denial 2/7/22 Lloyd's denial 11/29/23	1/18/2022	CNA Travelers 1/17/2022
56	352	21CV002553	1978-1979	CNA denial 2/7/22 Travelers agreement Lloyd's denial 11/29/23	1/18/2022	CNA 1/27/22 Travelers 1/27/22
57		21CV003362	1958-1962	Chubb agreement Lloyd's ack/ROR 11/29/23	1/27/2022	Chubb 1/28/22
58	444	22CV006696	1973	Travelers ack. AIG issued ack/prelim ROR 7/19/22 CNA denial 8/17/22 Lloyd's denial 11/29/23 Westport ack/ROR 12/27/23	3/22/2022	CNA 3/23/22 Intact Insurance 3/23/22 OneBeacon 3/23/22 AIG 3/23/22 Swiss Re 3/23/22
59	169	22CV006473	1972-1975	AIG ack/ROR 4/22/22 CNA denial 8/17/22 Lloyd's denial 11/29/23	3/22/2022	CNA 3/23/22 Travelers 3/23/22 Intact Insurance 3/23/22

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
						AIG 3/23/22 Swiss Re 3/23/22 OneBeacon 3.23.22
60	255	22CV006519	1972	AIG ack/ROR 5/10/22 Lloyd's denial 11/29/23 Westport ack/ROR 12/27/23	3/22/2022	Intact 3/23/22 OneBeacon 3/23/22 AIG 3/23/22 Swiss Re 3/23/22
61	256	22CV006624	1981-1982	Chubb ROR/denial 10/5/22 Lloyd's denial 11/29/23	7/5/2022	Intact 7/6/22 OneBeacon 7/6/22 Travelers 7/6/22 Chubb 7/6/22
62	167	22CV008082	1989-1990	Lloyd's denial 11/29/23		
63	470	21CV002261	1980	CNA ack/ROR 7/15/22 Chubb ROR/denial 10/5/22 Lloyd's denial 11/29/23	7/5/2022	Travelers 7/6/22 Chubb 7/6/22 CNA 7/6/22
64	32	21CV003446	1981 (for 6 weeks)	CNA ack/ROR 7/15/22 Lloyd's denial 11/29/23	7/5/2022	Travelers 7/6/22 CNA 7/6/22
65	518	22CV010527	1963 or 1964 or 1965	Chubb ROR 10/5/22 - agreement Lloyd's ack/ROR 11/29/23	7/5/2022	Chubb 7/6/22 RPS Ins. 7/6/22
66	171	21CV000053	1970-1974	AIG ack/ROR 7/19/22 Chubb ROR 10/5/22 - agreement CNA ack. 7/15/22 Westport ack/ROR 10/14/22 Lloyd's denial 11/29/23	7/5/2022	Chubb 7/6/22 Intact 7/6/22 OneBeacon 7/6/22 Swiss Re 7/6/22 CNA 7/6/22 Intact Insurance 7/6/22 RPS Ins. 7/6/22
67	12	22CV011957	1972	American Home – Ack/ROR letter 8/16/22	7/5/2022	Intact 7/6/22

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Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
				Westport (for E. Re) ack/ROR 7/18/22 AIG ack/ ROR 6/28/23 Lloyd's ack/ROR 11/29/23		OneBeacon 7/6/22 Swiss Re 7/6/22 AIG 7/6/22
68	375	22CV012253	1968-1969	Chubb ack/ ROR 7/19/23 Lloyd's ack/ROR 11/29/23	10/3/2022	Chubb 7/13/23
69	418	Notice of Claim	1991-1992			
70 70a		Notice of Claim 22CV016748	1968	Chubb/ack. 7/24/23	9/12/2022	Chubb 7/16/2023 Chubb 10/11/22 RPS Ins. 10/11/22
71 71a	377	Notice of Claim 22CV019472	1978-1979	Travelers ack/ROR 10/18/22 Chubb ack/ROR 9/5/23 Lloyd's denial 11/29/23	9/12/2022	Travelers 10/11/22 CNA 10/11/22
72		Notice of Claim	1973-1974	AIG ack/ROR 10/31/22 Chubb ack/ROR 2/23/23	9/12/2022	Intact 10/12/22 CNA 10/12/22 AIG 10/12/22 Westport 10/12/22 Swiss Re 10/12/22
73 73a	523	Notice of Claim 22CV018875	1983-1986	Travelers ack/ROR 8/2/23 Chubb ack 12/15/23 Lloyd's denial 11/29/23	9/19/2022 12/28/2022	Travelers 7/16/2023 Chubb 7/16/2023
74	185	Notice of Claim 22CV020527	1966	Chubb ack/ROR 9/26/22 Lloyd's ack/ROR 11/29/23	9/12/2022	Chubb
75		Notice of Claim	1966-1967		9/12/2022	Chubb 10/12/22
76	113 126	Notice of Claim 22CV023336	1972-1974	AIG ack/ROR 10/31/22 Westport ack/ROR 10/14/22	9/13/2022	Intact 10/12/22 AIG 10/12/22

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
						Westport 10/12/22 Swiss Re 10/12/22
77	401 528	Mediation notice of claim 22CV021898 Mediation notice of claim 22CV015140	1968-1972	Chubb ack/ROR 7/19/23 AIG ack/ROR 7/24/23 Lloyd's denial 11/29/23	9/30/2022	AIG 7/13/2023 Swiss Re 7/13/2023 Chubb 7/13/2023 OneBeacon 7/13/23
78	521	Notice of Claim	1956-1958			
79 79a	510	Notice of Claim 22CV015938	1963-1965	Chubb ack/ROR 10/17/23 Lloyd's ack/ROR 11/29/23	9/13/2022	Chubb 10/12/22
80 80a	511 512	Notice of Claim Notice of Claim 22CV015043	1974-1975 or "1980s	Travelers ack/ROR 8/2/23 Chubb ack/ROR 7/19/23 AIG denial 8/8/23 Lloyd's denial 11/29/23 Westport ack/ROR 12/27/23	10/3/2022	CNA 7/13/23 AIG 7/13/23 Travelers 7/13/23 Swiss Re 7/13/23 OneBeacon 7/13/23 Chubb 7/13/23
81 81a	526	Notice of Claim 22CV018533	1970-1973	Chubb ack/ROR 10/13/22 Westport ack/ROR 10/14/22 AIG ack/ROR 7/8/23 Lloyd's denial 11/29/23	9/13/2022 6/1/2023	Chartis 8/4/2023 Swiss Re 10/12/2022 8/4/2023 AIG 10/12/2022 Intact Insurance 10/12/2022 Chubb 10/12/2022 8/4/2023

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
						OneBeacon 8/4/2023 Intact 10/12/22
82 82a	520	Notice of Claim 22CV017826	Mid to later 1970's	Chubb denial 6/22/23 Lloyd's ack/ROR 11/29/23	9/13/2022 5/31/2023	Chubb 10/12/2022 8/1/2023 Intact Insurance 10/12/2022
83	516	Notice of Claim	1977-1979	Travelers ack/ROR Lloyd's denial 11/29/23 Chubb ack 1/8/24	9/13/2022	Travelers 10/12/22 CNA 10/12/22 CNA 10/12/22
84	405	Notice of Claim 22CV022809	1996-1998	Lloyd's denial 11/29/23		
85	79	Notice of Claim 22CV022502	1973-1974	Westport ack/ROR 10/14/22 Lloyd's denial 11/29/23	9/13/2022 12/29/2022	CNA 7/14/2023 AIG 7/14/2023 Swiss Re 7/14/2023 Intact 10/13/22 AIG 10/13/22 Westport 10/13/22 CNA 10/13/22 Swiss Re 10/13/22
86 86a	78	Notice of Claim 22CV022476	1976-1977	Travelers ack/ROR 10/18/22 Westport ack/ROR 10/14/22 Lloyd's denial 11/29/23 Chubb ack 1/8/24	9/13/2022 10/11/2023	Travelers 10/13/22 CNA 10/13/22 Westport 10/13/22 Swiss Re 10/13/22

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
87 87a	68	Notice of Claim 22CV022518	1967-1972	Chubb ROR 10/17/22 - agreement AIG ack/ROR 10/20/22 Westport ack/ROR 10/14/22 Lloyd's denial 11/29/23	9/13/2022 10/16/2023	Intact 10/13/22 AIG 10/13/22 Westport 10/13/22 Chubb 10/13/22 Swiss Re 10/13/22
88 88a	74	Notice of Claim 22CV022456	1975-1976	Travelers ack/ROR 10/18/22 Westport ack/ROR 10/14/22 Lloyd's denial 11/29/23 AIG ROR 12/18/23 Chubb ack 1/8/24	9/13/2022 10/12/2023	Intact 10/13/22 Westport 10/13/22 CNA 10/13/22 Travelers 10/13/22 Swiss Re 10/13/22
89 192 89a	495	Notice of Claim 22CV023917 22CV023363	1957-1958	Lloyd's denial 11/29/23	9/13/2022 5/31/2023	
90	221	Notice of Claim 22CV016031	1969	Chubb ack/ROR 2/23/23 Lloyd's ack/ROR 11/29/23	9/14/2022	Chubb 12/3/22
91	219	Notice of Claim 22CV016111	1967-1969	Chubb ack/ROR 2/23/23 Lloyd's denial 11/29/23	9/14/2022	Chubb 12/3/22
92	217	Notice of Claim 22CV016472	1977 or 1978	Lloyd's ack/ROR 11/29/23	9/14/2022	Travelers 12/3/22 CNA 12/3/22
93	220	Notice of Claim 22CV016115	1959	Lloyd's ack/ROR 11/29/23	9/14/2022	

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
94	71	Notice of Claim	1972-1973	Lloyd's denial 11/29/23	9/14/2022	AGRM 12/3/22 Swiss Re 12/3/22
94a		22CV022056			10/9/2023	AIG 12/3/22
95	76	Notice of Claim	1974-1977	Travelers ack/ROR 8/2/23 AIG ack/ROR 8/2/23 Lloyd's denial 11/29/23 Westport ack/ROR 12/27/23 Chubb ack 1/8/24	9/15/2022 10/16/2023	CNA 7/12/2023 Travelers 7/12/2023
95a		22CV022633				AIG 7/12/2023 Swiss Re 7/12/2023
96	69	Notice of Claim	1974-1975	AIG ack/ROR 7/27/23 Travelers ack/ROR 8/2/23 Travelers ack 11/2/21 Lloyd's denial 11/29/23 Westport ack/ROR 12/27/23	9/15/2022 10/12/2023	CNA 7/12/2023 Travelers 7/12/2023 AIG 7/12/2023 Swiss Re 7/12/2023 OneBeacon 7/12/23
96a		22CV022547				
97	77	Notice of Claim	1973-1976	 Travelers ack/ROR 8/2/23 AIG ack/ ROR 7/24/23 Lloyd's denial 11/29/23 Westport ack/ROR 12/27/23 Chubb ack 1/8/24	9/15/2022 10/12/2023	CNA 7/12/2023 Travelers 7/12/2023 AIG 7/12/2023 Swiss Re 7/12/2023 OneBeacon 7/12/23
97a		22CV022453				
98	44	Notice of Claim	1964-1969	Chubb ack/ ROR 7/19/23 Lloyd's ack/ROR 11/29/23	9/30/2022 10/16/2023	Chubb 7/13/23

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
98a		22CV022606				
99	45	Notice of Claim	1970s	AIG ack/ROR 7/28/23 Travelers ack/ROR 8/2/23 Chubb ack/ROR 7/19/23 Lloyd's ack/ROR 11/29/23 Westport ack/ROR 12/27/23	9/15/2022 10/12/2023	CNA 7/12/2023 Travelers 7/12/2023
99a		22CV022618				AIG 7/12/2023 Swiss Re 7/12/2023 Chubb 7/12/2023 OneBeacon 7/12/23
100	46	Notice of Claim	1970s	Chubb ack/ROR 7/19/23 Lloyd's denial 11/29/23 Westport ack/ROR 12/27/23	10/3/2022	AIG 7/13/23 Swiss Re 7/13/23
100a		Notice of Claim 22CV022622	1971-1972			Chubb 7/13/23
101	47	Notice of Claim	1970s	AIG ack/ROR 7/31/23 Travelers ack/ROR 8/2/23 Chubb ack/ROR 11/30/23 Chubb ack/ROR 11/30/23 Lloyd's ack/ROR 11/29/23	9/15/2022 10/12/2023	CNA 7/12/2023 Travelers 7/12/2023
101a		22CV022733				AIG 7/12/2023 Swiss Re 7/12/2023 Chubb 7/12/2023 OneBeacon 7/12/23
102		Notice of Claim	1970s	Travelers ack/ROR 8/2/23 Chubb ack/ROR 12/15/23 AIG ack/ROR 8/8/23 Westport ack/ROR 12/27/23	9/16/2022	CNA 7/12/2023 Travelers

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
						7/12/2023 AIG 7/12/2023 Swiss Re 7/12/2023 Chubb 7/12/2023 OneBeacon 7/12/23
103 103a	49	Notice of Claim RG21108498	1970s	AIG ack/ROR 7/31/23 Travelers ack/ROR 8/2/23 Chubb ack/ROR 7/19/23 Lloyd's ack/ROR 11/29/23 Westport ack/ROR 12/27/23	9/16/2022 10/16/2023	CNA 7/12/2023 Travelers 7/12/2023 AIG 7/12/2023 Swiss Re 7/12/2023 Chubb 7/12/2023 OneBeacon 7/12/23
104 104a	50	Notice of Claim RG21108531	1981-1982 or "1970s"	AIG ack/ROR 7/31/23 Travelers ack/ROR 8/2/23 Chubb ack/ROR 7/19/23 Lloyd's ack/ROR 11/29/23 Westport ack/ROR 12/27/23	9/16/2022 10/16/2023	CNA 7/12/2023 Travelers 7/12/2023 AIG 7/12/2023 Swiss Re 7/12/2023 Chubb 7/12/2023 OneBeacon 7/12/23
105		Notice of Claim	1970s	Travelers ack/ROR 8/2/23 Chubb ack/ ROR 7/19/23 AIG ack/ROR 8/2/23	9/16/2022	CNA 7/12/2023 Travelers 7/12/2023 AIG

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
				Westport ack/ROR 12/27/23		7/12/2023 Swiss Re 7/12/2023 Chubb 7/12/2023 OneBeacon 7/12/23
106		Notice of Claim	1970s	Travelers ack/ROR 8/2/23 Chubb ack/ROR 7/19/23 AIG ack/ROR 8/8/23 Westport ack/ROR 12/27/23	9/16/2022	CNA 7/12/2023 Travelers 7/12/2023 AIG 7/12/2023 Swiss Re 7/12/2023 Chubb 7/12/2023 OneBeacon 7/12/23
107	51	Notice of Claim 22CV023109	1960s	Chubb ack/ROR 11/30/23 Lloyd's ack/ROR 11/29/23	9/16/2022	Chubb 7/12/23
108	532	Notice of Claim	1990s			
109 109a	462	Notice of Claim 22CV020631	1960s	Chubb ack/ROR 7/19/23 Lloyd's ack/ROR 11/29/23	9/16/2022 2/27/2023	Chubb 7/12/2023 7/31/2023
110 110a	52	Notice of Claim 22CV023118	1970s	AIG ack/ROR 7/27/23 Lloyd's denial 11/29/23 Travelers ack/ROR 8/2/23 Chubb ack/ROR 11/30/23 Lloyd's denial 11/29/23 Westport ack/ROR 12/27/23	9/16/2022 10/12/2023	CNA 7/12/2023 Travelers 7/12/2023 AIG 7/12/2023 Swiss Re 7/12/2023

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
						Chubb 7/12/2023 OneBeacon 7/12/23
111		Notice of Claim	2000s	Great American denial 8/9/23	9/16/2022	Great American 7/12/23
112		Notice of Claim	1971 or 1972	Chubb ack/ ROR 7/19/23 AIG ack/ROR 8/10/23 Westport ack/ROR 12/27/23	9/16/2022	Swiss Re 7/12/2023 Chubb 7/12/2023 AIG 7/12/2023
113 113a	508	Notice of Claim 22CV018198	1974	AIG ack/ROR 9/23/23 Lloyd's denial 11/29/23	9/16/2022 9/1/2023	Swiss Re 7/12/2023 AIG 7/12/2023 CNA 7/12/2023 OneBeacon 7/12/23
114 114a	515	Notice of Claim 22CV017850	1965	Lloyd's ack/ROR 11/29/23 Chubb ack/ ROR 7/19/23	9/19/2022 12/28/2022	Chubb 7/12/2023 7/16/2023
115 115a	519	Notice of Claim 22CV018880	1974-1975 1978-1979	 AIG ack/ROR 7/28/23 Travelers ack/ROR 8/2/23 Lloyd's denial 11/29/23 Westport ack/ROR 12/27/23	9/19/2022 12/28/2022	CNA 7/12/2023 7/16/2023 Travelers 7/12/2023 7/16/2023 AIG 7/12/2023 7/16/2023 Swiss Re 7/12/2023 7/16/2023 OneBeacon 7/12/23

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
116	524	Notice of Claim 22CV018167	1992	Lloyd's denial 11/29/23	9/19/2022 12/28/2022	Not reported 7/12/2023
117 117a	522	Notice of Claim 22CV017382	1972-1980	 Travelers ack/ROR 8/2/23 Westport ack/ROR 12/27/23 Chubb ack/ ROR 7/19/23 Chubb ack/ROR 11/30/23 AIG ack/ ROR 7/24/23 Lloyd's denial 11/29/23	9/19/2022 12/28/2022	CNA 7/12/2023 7/16/2023 Travelers 7/12/2023 7/16/2023 AIG 7/12/2023 7/16/2023 Swiss Re 7/12/2023 7/16/2023 Chubb 7/12/2023 7/16/2023 OneBeacon 7/13/23
118 118a	514	Notice of Claim 22CV018172	1985-1986	Travelers ack/ROR 8/2/23 Chubb ack/ ROR 7/19/23 Lloyd's denial 11/29/23 Travelers ack/ROR 9/5/23	9/19/2022 9/1/2023	Travelers 7/13/23 Chubb 7/13/23
119	88	Notice of Claim	1960-1962	Chubb ack/ROR 2/23/23	9/13/2022	Chubb 10/12/22
120		Notice of Claim	1963 or 1964	Chubb ack/ROR 7/19/23	9/19/2022	Chubb 7/13/23
121	384	22CV015222	1977	Lloyd's ROR 11/29/23 Chubb ack 1/8/24	9/19/2022	Travelers 7/13/23 CNA 7/13/23

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122 122a	388	Notice of Claim RG20061429	1986-1989	Travelers ack/ROR 8/2/23 Lloyd's denial 11/29/23	8/3/2020 9/19/2022	Travelers 7/13/23
123	378	Notice of Claim	1971	AIG ack/ ROR 8/2/23	9/19/2022	AIG 7/13/23 Swiss Re 7/13/23 OneBeacon 7/13/23
124 124a	383	Notice of Claim 22CV019574	1978	Lloyd's ROR 11/29/23 Travelers ack/ROR 8/2/23	9/19/2022	Travelers 7/13/23
125 125a	341	Notice of Claim RG20064221	1986	Travelers ack/ROR 8/2/23	9/19/2022 8/3/2020	Travelers 7/13/23
126 126a	379	Notice of Claim 22CV017880	1974-1975	Travelers ack/ROR 8/2/23 Westport ack/ROR 12/27/23 AIG ack/ROR 8/8/23	9/19/2022	CNA 7/12/2023 Travelers 7/12/2023 AIG 7/12/2023 Swiss Re 7/12/2023 OneBeacon 7/13/23
127 127a	345	Notice of Claim 22CV017872	1985-1986	Travelers ack/ROR 8/2/23 Chubb ack/ROR 7/19/23 Lloyd's ack/ROR 11/29/23 Chubb ack 12/15/23	9/20/2022	Travelers 7/13/23 Chubb 7/13/23
128	381	Notice of Claim	1978-1979	Travelers ack/ROR 8/2/23 Lloyd's ack/ROR 11/29/23	9/20/2022	CNA 7/13/23 Travelers 7/13/23

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
128a		22CV015297				
129 129a	278	Notice of Claim 10/27/2022	1969-1970	Chubb ack/ROR 7/19/23 Lloyd's ROR 11/29/23	9/20/2022	Chubb 7/13/23 OneBeacon 7/13/23
130	472	Notice of Claim 22CV020696	1984-1987	Travelers ack/ROR 8/2/23 Lloyd's ack/ROR 11/29/23 Chubb ack/ ROR 7/19/23	9/20/2022	Travelers 7/13/23 Chubb 7/13/23
131	331	Notice of Claim	1974,1975 and/or 1976		9/20/2022 5/30/2023	CNA 7/13/23 Travelers 7/13/23 AIG 7/13/23 Swiss Re 7/13/23 OneBeacon 7/13/23
132	329	Notice of Claim	1976, 1977 and/or 1978	Travekers ack/ ROR 8/11/23	9/20/2022 5/30/2023	CNA 7/13/23 Travelers 7/13/23 AIG 7/13/23 Swiss Re 7/13/23 OneBeacon 7/13/23 Chubb 7/13/23
133	354	Notice of Claim	1981 and/or 1982		9/20/2022 5/31/2023	Travelers 7/12/2023 8/1/2023 Chubb 7/12/2023 8/1/2023
134	351	Notice of Claim	1994 and/or 1995		9/20/2022 5/31/2023	Not reported 7/13/2023
135	330	Notice of Claim	1972	AIG ack/ROR 7/28/23	9/20/2022 5/31/2023	AIG 7/14/2023 Chartis 8/1/2023 Swiss Re 7/14/2023 8/1/2023 OneBeacon 7/14/2023

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						8/1/2023
136	356	Notice of Claim	1973 and/or 1974		9/20/2022 5/31/2023	CNA 7/12/2023 8/1/2023 AIG 7/12/2023 Chartis 8/1/2023 Swiss Re 7/12/2023 8/1/2023 OneBeacon 7/12/2023 8/1/2023
137 137a	83	Notice of Claim 22CV020073	1964	Chubb ack/ROR 7/19/23 Lloyd's ack/ROR 11/29/23	9/20/2022 2/23/2023	Chubb 07/12/2023 7/25/2023
138 138a	238	Notice of Claim 22CV020075	1998-1999	Lloyd's denial 11/29/23	9/20/2022 10/15/2023	Not reported
139 139a	85	Notice of Claim 22CV020082	1968	Chubb ack/ROR 7/19/23 Lloyd's ack/ROR 11/29/23	9/21/2022 2/23/2023	Chubb 07/12/2023 7/25/2023
140 140a	86	Notice of Claim 22CV020101	1975-1980	Travelers ack/ROR 8/2/23 Chubb ack/ROR 7/19/23 Lloyd's ack/ROR 11/29/23 Westport ack/ROR 12/27/23	9/21/2022 2/23/2023	CNA 7/12/2023 7/25/2023 Travelers 7/12/2023 7/25/2023 Swiss Re 7/12/2023 7/25/2023 OneBeacon 7/12/2023 7/25/2023 Chubb 07/12/2023

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						7/25/2023
141 141a	121	Notice of Claim 22CV020085	1984-1987	Travelers ack/ROR 8/2/23 Lloyd's denial 11/29/23 Chubb ack/ ROR 7/19/23	9/21/2022 10/15/2023	Travelers 7/13/23 Chubb 7/13/23
142 142a	172	Notice of Claim 22CV020135	1966 and 1968	Chubb ack/ROR 7/6/23 Lloyd's ack/ROR 11/29/23	9/21/2022 2/23/2023	Chubb 07/12/2023 7/25/2023
143 143a	165	Notice of Claim 22CV020136	1974	AIG ack/ROR 7/27/23 Lloyd's ack/ROR 11/29/23 Westport ack/ROR 12/27/23	9/21/2022 2/23/2023	CNA 7/14/2023 7/25/2023 AIG 7/14/2023 7/25/2023 Swiss Re 7/14/2023 7/25/2023
144 144a	271	Notice of Claim 22CV020164	1975-1976	Travelers ack/ROR 8/2/23 Lloyd's ack/ROR 11/29/23 Westport ack/ROR 12/27/23 Chubb ack 1/8/24	9/21/2022 2/24/2023	CNA 7/12/2023 7/31/2023 Travelers 7/12/2023 7/31/2023 Swiss Re 7/12/2023 7/31/2023 OneBeacon 7/12/2023 7/31/2023
145	120	Notice of Claim	1970-1973	Chubb ack/ROR 7/19/23 AIG ack/ROR 8/7/23 Lloyd's ack/ROR 11/29/23	9/21/2022 2/27/2023	AIG 7/12/2023

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Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
145a		22CV020287		Westport ack/ROR 12/27/23		Chartis 7/31/2023 Swiss Re 7/12/2023 7/31/2023 OneBeacon 7/12/2023 7/31/2023 Chubb 7/12/2023 7/31/2023
146 146a	87	Notice of Claim 22CV020197	1971-1972	AIG ack/ROR 7/28/23 Lloyd's ack/ROR 11/29/23 Chubb ack/ ROR 7/19/23 Westport ack/ROR 12/27/23	9/22/2022 2/27/2023	AIG 7/12/2023 Chartis 7/31/2023 Swiss Re 7/12/2023 7/31/2023 OneBeacon 7/12/2023 7/31/2023 Chubb 7/13/23
147 147a	457	Notice of Claim 22CV020298	1966-1967	Chubb ack/ROR 7/19/23 Lloyd's ack/ROR 11/29/23	9/21/2022 2/27/2023	Chubb 7/12/2023 7/31/2023
148		Notice of Claim	1942-1949		9/22/2022	
149 149a	118	Notice of Claim 22CV020455	1977-1979	Travelers ack/ROR 8/2/23 Lloyd's denial 11/29/23	9/22/2022 8/29/2023	CNA 7/12/2023 Travelers 7/12/2023
150		Notice of Claim	1964, 1965, and/or 1966	Chubb ack/ROR 7/19/23	9/22/2022	Chubb 7/13/23

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
151	114	Notice of Claim	1973-1974	AIG ack/ROR 7/24/23	9/22/2022	CNA
				Lloyd's ROR 11/29/23 Westport ack/ROR 12/27/23	8/29/2023	7/13/2023
151a		22CV020423				AIG 7/13/2023 Swiss Re 7/13/2023 OneBeacon 7/13/23
152	174	Notice of Claim	1979-1980	Travelers ack/ROR 8/2/23	9/22/2022	CNA
				Chubb ack 12/15/23 Lloyd's denial 11/29/23	2/27/2023	7/13/2023 7/31/2023
152a		22CV020491				Travelers 7/13/2023 7/31/2023 Chubb 7/13/2023 7/31/2023
153	110	Notice of Claim	1971-1972	Chubb ack 12/15/23	9/22/2022	AIG
				Lloyd's ack/ROR 11/29/23 Westport ack/ROR 12/27/23	2/24/2023	7/13/2023 7/31/2023
153a		22CV020636				Swiss Re 7/13/2023 7/31/2023 Chubb 7/13/2023 7/31/2023 OneBeacon 7/13/2023 7/31/2023
154	460	Notice of Claim	1977-1982	Chubb ack/ROR 7/19/23	9/22/2022	CNA
				Lloyd's denial 11/29/23	2/27/2023	7/13/2023 7/31/2023
154a		22CV020654				Travelers 7/13/2023 7/31/2023 Chubb

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Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
						7/13/2023 7/31/2023
155 155a	234	Notice of Claim 22CV020661	1963-1965	Chubb ack/ROR 11/29/23 Lloyd's ack/ROR 11/29/23	9/26/2022 10/15/2023	Chubb 7/13/23
156 156a	112	Notice of Claim 22CV020795	1982-1983	Lloyd's ack/ROR 11/29/23	9/26/2022 10/15/2023	Travelers 7/13/2023
157 157a	193	Notice of Claim 22CV020519	1980	Chubb ack 12/15/23 Travelers ack/ ROR 8/11/23 Lloyd's denial 11/29/23	9/26/2022 6/1/2023	CNA 7/13/2023 8/4/2023 Travelers 7/13/2023 8/4/2023 Chubb 7/13/2023 8/4/2023
158 158a	228	Notice of Claim 22CV020602	1972-1976	Chubb ack/ ROR 7/19/23 Travelers ack/ROR 8/2/23 AIG ack/ROR 8/7/23 Lloyd's ack/ROR 11/29/23 Westport ack/ROR 12/27/23	9/26/2022 2/27/2023	CNA 7/13/2023 7/31/2023 Travelers 7/13/2023 7/31/2023 AIG 7/13/2023 Chartis 7/31/2023 OneBeacon 7/13/2023 7/31/2023 Swiss Re 7/13/2023 7/31/2023 Chubb 7/13/2023 7/31/2023

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Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
159 159a	240	Notice of Claim 22CV020808	1969-1971	Chubb ack/ ROR 7/19/23 Lloyd's ack/ROR 11/29/23 AIG ack/ROR 8/10/23 Westport ack/ROR 12/27/23	9/26/2022 10/15/2023	AIG 7/13/23 Swiss Re 7/13/23 Chubb 7/13/23 OneBeacon 7/13/23
160 160a	91	Notice of Claim 22CV021712	1969, 1973-1974	Chubb ack/ ROR 7/19/23 AIG ack/ ROR 7/24/23 Westport ack/ROR 12/27/23	9/29/2022 6/1/2023	CNA 7/13/2023 8/4/2023 AIG 7/13/2023 Chartis 8/4/2023 Swiss Re 7/13/2023 8/4/2023 Chubb 7/13/2023 8/4/2023 OneBeacon 7/13/2023 8/4/2023
161	428	Notice of Claim	1959-1960		9/29/2022	
162 162a	420	Notice of Claim 22CV015357	1972-1974	AIG ack/ROR 7/31/23 Lloyd's denial 11/29/23	9/28/2022	AIG 7/13/23 Swiss Re 7/13/23 OneBeacon 7/13/23
163	414	Notice of Claim 22CV015576	1974-1977	AIG ack/ROR 7/25/23 Lloyd's denial 11/29/23	9/29/2022	CNA 7/13/23 Travelers 7/13/23 AIG 7/13/23 Swiss Re 7/13/23 OneBeacon 7/13/23

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
164	326	Notice of Claim 22CV015539	1974	AIG ack/ROR 8/16/23 Lloyd's denial 11/29/23 Westport ack/ROR 12/27/23	9/29/2022	CNA 7/13/23 AIG 7/13/23 Swiss Re 7/13/23 OneBeacon 7/13/23
165	419	Notice of Claim	1973-1974	AIG ack/ROR 7/24/23 Westport ack/ROR 12/27/23	9/29/2022	CNA 7/13/23 AIG 7/13/23 Swiss Re 7/13/23 OneBeacon 7/13/23
166 166a	417	Notice of Claim 22CV018177	1979-1983	Chubb ack/ROR 7/19/23 Lloyd's denial 11/29/23	9/29/2022	CNA 7/13/23 Travelers 7/13/23 Chubb 7/13/23
167	423	Notice of Claim 22CV018460	1972-1973	AIG ack/ROR 8/16/23 Westport ack/ROR 12/27/23 Lloyd's denial 11/29/23	9/29/2022	AIG 7/14/2023 Swiss Re 7/14/2023
168	430	Notice of Claim 22CV019871	1979	Lloyd's denial 11/29/23	9/29/2022	CNA 7/13/23 Travelers 7/13/23
169	432	Notice of Claim	1991-1992		9/29/2022	Not reported 7/13/2023
170	409	Notice of Claim 22CV018998	1991-1998	Lloyd's denial 11/29/23	9/29/2022	
171 171a	412	Notice of Claim 22CV021259	1982-1985	Chubb ack/ROR 7/19/23 Lloyd's denial 11/29/23	9/29/2022	Travelers 7/13/23 Chubb 7/13/23
172	415	Notice of Claim 22CV018180	1978	Lloyd's denial 11/29/23	9/29/2022	CNA 7/13/23

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
						Travelers 7/13/23
173	425	Notice of Claim 22CV024211	1972-1974	AIG ack/ROR 8/10/23 Lloyd's denial 11/29/23 Westport ack/ROR 12/27/23	9/29/2022	CNA 7/13/23 AIG 7/13/23 Swiss Re 7/13/23 OneBeacon 7/13/23
174	413	Notice of Claim 22CV023198	1976-1979	Travelers ack/ROR 8/2/23 Lloyd's denial 11/29/23 Westport ack/ROR 12/27/23 Chubb ack 1/8/24	9/29/2022	CNA 7/13/23 Travelers 7/13/23 Swiss Re 7/13/23
175 175a	525	Notice of Claim 22CV022493	1968-1972	AIG ack/ROR 7/31/23 Lloyd's denial 11/29/23 Chubb ack/ ROR 7/19/23 Westport ack/ROR 12/27/23	9/29/2022	AIG 7/13/23 Swiss Re 7/13/23 Chubb 7/13/23 OneBeacon 7/13/23
176 176a	485	Notice of Claim 22CV020607	1963 and/or 1964	Lloyd's ack/ROR 11/29/23 Chubb ack/ ROR 7/19/23	9/30/2022 1/24/2023	Chubb 7/14/2023
177 177a	282	Notice of Claim 22CV022358	1962	Lloyd's ack/ROR 11/29/23 Chubb ack/ ROR 7/19/23	9/30/2022 1/24/2023	Chubb 7/14/2023
178 178a	461	Notice of Claim 22CV022806	1973 or 1974	AIG ack/ROR 7/24/23 Lloyd's denial 11/29/23 Westport ack/ROR 12/27/23	9/30/2022 3/1/2023	CNA 7/13/2023 7/31/2023 AIG 7/13/2023 Swiss Re 7/13/2023 7/31/2023 Chartis

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
						7/31/2023 OneBeacon 7/13/2023 7/31/2023
179 179a	316	Notice of Claim 22CV022956	1968	Chubb ack/ROR 7/29/23	9/29/2022 10/8/2023	Chubb 7/13/23
180 180a	129	Notice of Claim 22CV021638	In or around 1974, 1975, 1976, 1977, 1978, 1979, 1980, and/or 1981	Travelers ack/ROR 8/2/23 Chubb ack/ ROR 7/19/23 Westport 12/27/23 AIG ack/ROR 8/16/23 Lloyd's ack/ROR 11/29/23	10/4/2022 2/1/2023	CNA 07/13/2023 7/17/2023 Travelers 07/13/2023 7/17/2023 AIG 7/13/2023 7/17/2023 Swiss Re 7/13/2023 7/17/2023 OneBeacon 7/13/2023 7/17/2023 Chubb 07/13/2023 7/17/2023
181 181a	127	Notice of Claim 22CV020487	In or around 1972, 1973, 1974, 1975, 1976 and/or 1977	AIG ack/ROR 7/28/23 Travelers ack/ROR 8/2/23 Lloyd's ack/ROR 11/29/23 Westport ack/ROR 12/27/23 Chubb ack 1/8/24	10/4/2022 1/25/2023	CNA 7/13/2023 7/17/2023 Travelers 7/13/2023 7/17/2023 AIG 7/13/2023 7/17/2023 Swiss Re 7/13/2023 7/17/2023 OneBeacon 7/13/23
182	130	Notice of Claim	In or around 1973, 1974 and/or 1975	Travelers ack/ROR 8/2/23	10/5/2022	CNA

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
				Lloyd's ack/ROR 11/29/23 Westport ack/ROR 12/27/23	1/27/2023	7/13/2023 7/17/2023
182a		22CV020432				Travelers 7/13/2023 7/17/2023 AIG 7/13/2023 7/17/2023 Swiss Re 7/13/2023 7/17/2023 OneBeacon 7/13/23
183	315	Notice of Claim	In or around 1977 and/or 1978	Travelers ack/ROR 8/2/23	10/4/2022	CNA
				Lloyd's ack/ROR 11/29/23 Chubb ack 1/8/24	1/25/2023	7/13/2023 7/17/2023
183a		22CV020431				Travelers 7/13/2023 7/17/2023
184	131	Notice of Claim	In or around 1969, 1970, 1971 and/or 1972	Chubb ack/ ROR 7/19/23	10/5/2022	AIG
				Lloyd's ack/ROR 11/29/23 AIG ack/ ROR 7/24/23	1/25/2023	7/13/2023 7/17/2023
				Westport ack/ROR 12/27/23		Swiss Re
184a		22CV020434				7/13/2023 7/17/2023 Chubb 7/13/2023 7/17/2023 OneBeacon 7/14/23
185	132	Notice of Claim	In or around 1965, 1966, 1967, 1968, 1969, 1970, 1971, and/or 1972	Chubb ack/ ROR 7/19/23	10/5/2022	AIG
				Lloyd's ack/ROR 11/29/23 AIG ack/RoR 7/25/23 Westport ack/ROR 12/27/23	1/25/2023	7/13/2023 7/17/2023
185a		22CV020436				Swiss Re 7/13/2023 7/17/2023 Chubb 7/13/2023 7/17/2023 OneBeacon 7/14/23

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
186	133	Notice of Claim	In or around 1970, 1971, and/or 1972	Chubb ack/ ROR 7/19/23 Lloyd's ack/ROR 11/29/23 AIG ack/ROR 8/7/23 Westport ack/ROR 12/27/23	10/5/2022 1/30/2023	AIG 7/13/2023 7/17/2023
186a		22CV020473				Swiss Re 7/13/2023 7/17/2023 Chubb 7/13/2023 7/17/2023 OneBeacon 7/14/23
187	135	Notice of Claim	In or around 1965, 1966, 1967, 1968, 1969, 1970, 1971, 1972 and/or 1973	Chubb ack/ ROR 7/19/23 AIG ack/ ROR 7/24/23 Lloyd's ack/ROR 11/29/23 Westport ack/ROR 12/27/23	10/5/2022 2/23/2023	AIG 7/13/2023 7/31/2023 Swiss Re 7/13/2023 7/31/2023
187a		22CV020478				OneBeacon 7/13/2023 7/31/2023 Chubb 7/13/2023 7/31/2023
188	134	Notice of Claim	In or around 1969 and/or 1970	Chubb ack/ ROR 7/19/23 Lloyd's ack/ROR 11/29/23	10/5/2022 1/30/2023	Chubb 7/13/2023 7/16/2023
188a		22CV020474				OneBeacon 7/14/23
189	136	Notice of Claim	In or around 1975, 1976, 1977, 1978, 1979, 1980, and/or 1981	Travelers ack/ROR 8/2/23 Chubb ack/ ROR 7/19/23 AIG ack/ ROR 7/24/23 Lloyd's ack/ROR 11/29/23 Westport ack/ROR 12/27/23	10/7/2022 1/30/2023	CNA 7/13/2023 7/17/2023 AIG 7/13/2023 7/17/2023
189a		22CV020485				Swiss Re 7/13/2023 7/17/2023

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
						Chubb 7/13/2023 7/17/2023 Travelers 7/14/23 OneBeacon 7/14/23
190 190a	138	Notice of Claim 22CV020437	In or around 1968, 1969, 1970, 1971, 1972, 1973, 1974, and/or 1975	Travelers ack/ROR 8/2/23 Lloyd's ack/ROR 11/29/23 Chubb ack/ ROR 7/19/23 Westport ack/ROR 12/27/23 AIG ack/ RoR 7/25/23	10/7/2022 1/31/2023	CNA 7/14/2023 7/16/2023 Travelers 7/14/2023 7/16/2023 AIG 7/14/2023 7/16/2023 Swiss Re 7/14/2023 7/16/2023 Chubb 7/14/2023 7/16/2023
191 191a	139	Notice of Claim 22CV020438	In or around 1978, 1979, 1980, 1981, and/or 1982	Travelers ack/ROR 8/2/23 Chubb ack/ ROR 7/19/23 Lloyd's denial 11/29/23	10/3/2022 1/27/2023	CNA 7/13/2023 7/17/2023 Travelers 7/13/2023 7/17/2023 Chubb 7/13/2023 7/17/2023
192	186	Notice of Claim	In or around 1972, 1973, 1974, 1975, 1976, 1977, 1978, and/or 1979	Travelers ack/ROR 8/2/23 AIG ack/ROR 8/10/23 Westport ack/ROR 12/27/23 Chubb ack 1/8/24	10/7/2022	CNA 7/14/2023 Travelers 7/14/2023 AIG 7/14/2023 Swiss Re 7/14/2023

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193	141	Notice of Claim	In or around 1981	Travelers ack/ROR 8/2/23	10/11/2022	Travelers 07/14/2023
				Lloyd's preliminary denial 11/29/23 Chubb ack/ ROR 7/19/23	1/30/2023	7/16/2023 Chubb 7/14/2023
193a		22CV020322				7/16/2023
194	335	Notice of Claim	In or around 1976, 1977, 1978, 1979, 1980, 1981 and/or 1982	Travelers ack/ROR 8/2/23	10/11/2022	CNA 07/13/2023
				Chubb ack/ ROR 7/19/23 Lloyd's ack/ROR 11/29/23 Westport ack/ROR 12/27/23	2/2/2023	7/17/2023 Travelers 07/13/2023 7/17/2023
194a		22CV020323				Swiss Re 7/13/2023 7/17/2023 Chubb 07/13/2023 7/17/2023
195	160	Notice of Claim	In or around 1967, 1968, 1969 and/or 1970	Chubb ack/ ROR 7/19/23	10/11/2022	OneBeacon 07/13/2023
				Lloyd's ack/ROR 11/29/23	2/2/2023	7/17/2023
195a		22CV020333				Chubb 07/13/2023 7/17/2023
196	145	Notice of Claim	In or around 1967, 1968, 1969, 1970, and/or 1971	Chubb ack/ ROR 7/19/23	10/11/2022	AIG 07/13/2023
				Lloyd's ack/ROR 11/29/23 AIG ack/ RoR 7/25/23	2/2/2023	7/17/2023 Swiss Re 07/13/2023
196a		22CV020369				7/17/2023 Chubb 07/13/2023 7/17/2023 OneBeacon 07/13/2023 7/17/2023
197	144	Notice of Claim	In or around 1965 and/or 1966	Lloyd's ROR 11/29/23	10/11/2022	Chubb 07/13/2023
				Chubb ack/ ROR 7/19/23	1/31/2023	7/17/2023
197a		22CV020348				
198	140	Notice of Claim	In or around 1977, 1978, and/or1979	Travelers ack/ROR 8/2/23	10/7/2022	CNA
				Lloyd's ack/ROR 11/29/23 Chubb ack 1/8/24	1/31/2023	7/14/2023 7/17/2023

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
198a		22CV020321				Travelers 7/14/2023 7/17/2023
199	298	Notice of Claim	In or around 1972 and/or 1973	AIG ack/ROR 8/9/23 Lloyd's ack/ROR 11/29/23 Westport ack/ROR 12/27/23	10/11/2022 2/23/2023	AIG 7/14/2023 7/25/2023
199a		22CV020349				Swiss Re 7/14/2023 7/25/2023 OneBeacon 7/14/2023 7/25/2023
200	143	Notice of Claim	In or around 1972, 1973, and/or 1975	Travelers ack/ROR 8/2/23 Lloyd's ack/ROR 11/29/23 AIG ack/ROR 8/9/23	10/11/2022 1/31/2023	CNA 07/13/2023 7/17/2023
200a		22CV020347		Westport ack/ROR 12/27/23		Travelers 07/13/2023 7/17/2023 AIG 7/13/2023 7/17/2023 Swiss Re 07/13/2023 7/17/2023 OneBeacon 07/13/2023 7/17/2023
201	137	Notice of Claim	In or around 1973 and/or 1974	AIG ack/ROR 8/2/23 Lloyd's ack/ROR 11/29/23 Westport ack/ROR 12/27/23	10/7/2022 1/31/2023	CNA 07/13/2023 7/17/2023
201a		22CV020435				AIG 7/13/2023 7/17/2023 Swiss Re 7/13/2023 7/17/2023 OneBeacon 7/13/2023 7/17/2023
202	142	Notice of Claim	In or around 1964, 1965 and/or 1966	Chubb ack/ROR 7/9/23 Lloyd's ROR 11/29/23	10/14/2022 2/7/2023	Chubb 7/14/2023

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
202a		22CV020343				7/31/2023
203	189	Notice of Claim	In or around 1978 and/or 1979	Travelers ack/ROR 8/2/23 Lloyd's denial 11/29/23	10/11/2022 2/2/2023	CNA 07/13/2023 7/17/2023
203a		22CV020325				Travelers 07/13/2023 7/17/2023
204	149	Notice of Claim	In or around 1956, 1957, 1958, 1959, 1960, 1961, 1962, 1963 and/or 1964	Chubb ack/ROR 7/19/23 Lloyd's ack/ROR 11/29/23	10/12/2022 5/31/2023	Chubb 7/14/2023 8/1/2023
204a		22CV020375				
205	147	Notice of Claim	In or around 1967, 1971 and/or 1972	Chubb ack/ROR 7/19/23 Westport ack/ROR 12/27/23	10/12/2022	AIG 7/14/2023 Swiss Re 7/14/2023 Chubb 7/14/2023
206	153	Notice of Claim	In or around 1968, 1969, 1970, 1971, 1972, 1973, 1974, 1975 and/or 1976	Travelers ack/ROR 8/2/23 Lloyd's ack/ROR 11/29/23 Chubb ack/ ROR 7/19/23 AIG ack/ROR 8/9/23 Westport ack/ROR 12/27/23	10/12/2022 2/2/2023	CNA 7/14/2023 7/31/2023 Travelers 7/14/2023 7/31/2023 AIG 7/14/2023 7/31/2023 Swiss Re 7/14/2023 7/31/2023 Chubb 7/14/2023 7/31/2023 OneBeacon 7/14/2023
206a		22CV020388				

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
						7/31/2023
207 207a	152	Notice of Claim 22CV020382	In or around 1970, 1971, 1972, 1973 and/or 1974	Chubb ack/ROR 7/26/23 Chubb ack/ ROR 7/19/23 AIG ack/ROR 9/28/23 Lloyd's ack/ROR 11/29/23 Westport ack/ROR 12/27/23	10/12/2022 2/23/2023	CNA 7/14/2023 7/25/2023 AIG 7/14/2023 7/25/2023 Swiss Re 7/14/2023 7/25/2023 OneBeacon 7/14/2023 7/25/2023 Chubb 7/14/2023 7/25/2023
208 208a	151	Notice of Claim 22CV020378	In or around 1977, 1978, 1979, 1980, 1981 and/or 1982	Travelers ack/ROR 8/2/23 Chubb ack/ ROR 7/19/23 AIG denial 8/8/23 Lloyd's denial 11/29/23 Westport ack/ROR 12/27/23	10/12/2022 1/30/2023	CNA 7/14/2023 7/17/2023 Travelers 7/14/2023 7/17/2023 AIG 7/14/2023 7/17/2023 Swiss Re 7/14/2023 7/17/2023 Chubb 7/14/2023 7/17/2023
209 209a	146	Notice of Claim 22CV020374	In or around 1972, 1973, 1974, 1975, and/or 1976	Travelers ack/ROR 8/2/23 Lloyd's ack/ROR 11/29/23 AIG ack/ROR 9/28/23 Westport ack/ROR 12/27/23 Chubb ack 1/8/24	10/11/2022 1/31/2023	CNA 7/13/2023 7/17/2023 Travelers 7/13/2023 7/17/2023 OneBeacon 7/13/2023 7/17/2023

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
						AIG 7/13/2023 7/17/2023 Swiss Re 7/13/2023 7/17/2023
210 210a	157	Notice of Claim 22CV020398	In or around 1978 and/or 1979	Travelers ack/ROR 8/2/23 Lloyd's ack/ROR 11/29/23	10/12/2022 5/31/2023	CNA 7/14/2023 8/1/2023 Travelers 7/14/2023 8/1/2023
211   <

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
						7/17/2023
213 213a	155	Notice of Claim 22CV020391	In or around 1971, 1972, 1973, 1974 and/or 1975	AIG ack/ROR 7/28/23 Travelers ack/ROR 8/2/23 Chubb ack/ ROR 7/19/23 Lloyd's ack/ROR 11/29/23 Westport ack/ROR 12/27/23	10/12/2022 1/31/2023	CNA 7/14/2023 7/17/2023 Travelers 7/14/2023 7/17/2023 AIG 7/14/2023 7/17/2023 Swiss Re 7/14/2023 7/17/2023 OneBeacon 7/14/2023 7/17/2023 Chubb 7/14/2023 7/17/2023
214 214a	154	Notice of Claim 22CV020389	In or around 1966, 1967, 1968, 1969 and/or 1970	Chubb ack/ROR 7/19/23 Lloyd's ack/ROR 11/29/23	10/3/2022 2/23/2023	OneBeacon 7/13/2023 7/19/2023 Chubb 7/13/2023 7/19/2023
215 215a	159	Notice of Claim 22CV020399	In or around 1968, 1969, 1970, 1971, 1972, 1973, 1974, 1975 and/or 1976	Chubb ack/ ROR 7/19/23 Lloyd's ack/ROR 11/29/23 AIG ack/ ROR 7/24/23 Westport ack/ROR 12/27/23	10/14/2022 2/23/2023	CNA 7/14/2023 7/25/2023 Travelers 7/14/2023 7/25/2023 AIG 7/14/2023 7/25/2023 Swiss Re

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
						7/14/2023 7/25/2023 OneBeacon 7/14/2023 7/25/2023 Chubb 7/14/2023 7/25/2023
216 216a	368	Notice of Claim 22CV019903	In or around 1977 and/or 1978	Travelers ack/ROR 8/2/23 Lloyd's ack/ROR 11/29/23 Chubb ack 1/8/24	10/5/2022 3/7/2023	CNA 7/13/2023 7/31/2023 Travelers 7/13/2023 7/31/2023
217 217a	372	Notice of Claim 22CV019900	In or around 1971, 1972, 1973 and/or 1974	Chubb ack/ ROR 7/19/23 Lloyd's ack/ROR 11/29/23 AIG ack/ ROR 8/7/23 Westport ack/ROR 12/27/23	10/5/2022 3/7/2023	AIG 7/13/2023 Chartis 7/31/2023 CNA 7/13/2023 7/31/2023 Swiss Re 7/13/2023 7/31/2023 OneBeacon 7/13/2023 7/31/2023 Chubb 7/13/2023 7/31/2023
218 218a	369	Notice of Claim 22CV019910	In or around 1970 and/or 1971	Chubb ack/ ROR 7/19/23 AIG ack/ ROR 8/2/23 Lloyd's ack/ROR 11/29/23	10/12/2022 5/9/2023	AIG 7/14/2023 Chartis 8/1/2023 Swiss Re 7/14/2023 8/1/2023 OneBeacon 7/14/2023 8/1/2023

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Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
						Chubb 7/14/2023 8/1/2023
219 219a	365	Notice of Claim 22CV019902	In or around 1972	AIG ack/ROR 8/2/23 Lloyd's ack/ROR 11/29/23	10/11/2022 3/7/2023	AIG 7/14/2023 Chartis 7/31/2023 Swiss Re 7/14/2023 7/31/2023 OneBeacon 7/14/2023 7/31/2023
220 220a	371	Notice of Claim 22CV019921	In or around 1969 and/or 1970	Chubb ack/ROR 7/19/23 Lloyd's ack/ROR 11/29/23	10/12/2022 3/7/2023	Chubb 7/14/2023 7/31/2023 OneBeacon 7/14/2023 7/31/2023
221 221a	374	Notice of Claim 22CV019941	In or around 1971 and/or 1972	Chubb ack/ ROR 7/19/23 AIG ack/ROR 8/9/23 Lloyd's preliminary denial 11/29/23 Westport ack/ROR 12/27/23	10/13/2022 5/30/2023	AIG 7/14/2023 Chartis 8/1/2023 Swiss Re 7/14/2023 8/1/2023 OneBeacon 7/14/2023 8/1/2023 Chubb 7/14/2023 8/1/2023

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Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
222 222a	376	Notice of Claim 22CV019926	In or around 1972 and/or 1973	AIG ack/ROR 8/9/23 Lloyd's ROR 11/29/23 Westport ack/ROR 12/27/23	10/12/2022 3/2/2023	AIG 7/14/2023 Chartis 7/31/2023 Swiss Re 7/14/2023 7/31/2023 OneBeacon 7/14/2023 7/31/2023
223 223a	373	Notice of Claim 22CV019923	In or around 1973, 1974, and/or 1975	Travelers ack/ROR 8/2/23 Lloyd's ROR 11/29/23 AIG ack/ROR 8/2/23 Westport ack/ROR 12/27/23	10/3/2022 3/6/2023	CNA 7/13/2023 7/31/2023 Travelers 7/13/2023 7/31/2023 AIG 7/13/2023 Chartis 7/31/2023 OneBeacon 7/13/2023 7/31/2023 Swiss Re 7/13/2023 7/31/2023
224 224a	367	Notice of Claim 22CV019884	In or around 1980, 1981, 1982 and/or 1983	Chubb ack/ROR 7/19/23 Lloyd's ack/ROR 11/29/23	10/13/2022 10/15/2023	CNA 7/14/2023 Travelers 7/14/2023 Chubb 7/14/2023
225	342	Notice of Claim	In or around 1978, 1979, 1980, 1981, 1982, 1983, 1984, and/or 1985	Chubb ack/ROR 7/19/23 Lloyd's denial 11/29/23	10/13/2022 3/7/2023	CNA 7/14/2023 7/31/2023 Travelers 7/14/2023

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
225a		22CV019887				7/31/2023 Chubb 7/14/2023 7/31/2023
226	346	Notice of Claim	In or around 1982 and/or 1983	Travelers ack/ROR 8/2/23 Lloyd's denial 11/29/23	10/7/2022 5/9/2023	CNA 7/17/2023
226a		22CV020000				Travelers 7/31/2023
227	350	Notice of Claim	In or around 1981 and/or 1982	Travelers ack/ROR 8/2/23 Lloyd's denial 11/29/23 Chubb ack/ ROR 7/19/23	10/12/2022 5/31/2023	Travelers 7/14/2023 8/1/2023
227a		22CV019959				Chubb 7/14/2023 8/1/2023
228	468	Notice of Claim	Approx. 1985-1986	Travelers ack/ROR 8/2/23 Lloyd's denial 11/29/23 Chubb ack/ ROR 7/19/23	10/5/2022 12/7/2022	Travelers 7/16/2023 Travelers 7/14/23 Chubb 7/14/23
228a		22CV017963				
229	333	Notice of Claim	In or around 1973, 1974 and/or 1975	Travelers ack/ROR 8/2/23 Lloyd's ack/ROR 11/29/23 AIG ack/ROR 8/15/23 Westport ack/ROR 12/27/23	10/3/2022 5/31/2023	CNA 7/13/2023 8/1/2023
229a		22CV019961				Travelers 7/13/2023 8/1/2023 AIG 7/13/2023 Chartis 8/1/2023 Swiss Re 7/13/2023 8/1/2023 OneBeacon 7/14/2023 8/1/2023

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
230	334	Notice of Claim	In or around 1976, 1977 and/or 1978	Travelers ack/ROR 8/2/23 Lloyd's ack/ROR 11/29/23 Westport ack/ROR 12/27/23	10/5/2022 5/9/2023	CNA 7/13/2023 7/31/2023
230a		22CV019960				Travelers 7/13/2023 7/31/2023 Swiss Re 7/13/2023 7/31/2023
231	93	Notice of Claim	In or around 1960 and/or 1961	Lloyd's ROR 11/29/23	10/11/2022 5/31/2023	
231a		22CV019898				
232	344	Notice of Claim	In or around 1967, 1968 and/or 1969	Chubb ack/ROR 7/19/23 Lloyd's ack/ROR 11/29/23	10/3/2022 5/30/2032	CNA 7/12/2023
232a		22CV019896				Travelers 7/12/2023 AIG 7/12/2023 Swiss Re 7/12/2023 OneBeacon 7/12/2023 Chubb 7/12/2023 8/1/2023
233	348	Notice of Claim	In or around 1965	Chubb ack/ROR 7/19/23 Lloyd's ack/ROR 11/29/23	10/3/2022 5/31/2023	Chubb 7/13/2023 8/1/2023
233a		22CV019892				
234	353	Notice of Claim	In or around 1966, 1967, 1968, 1969 and/or 1970	Chubb ack/ROR 7/19/23 Lloyd's ack/ROR 11/29/23	10/3/2022 5/9/2023	Chubb 7/13/2023 8/1/2023 OneBeacon 7/13/2023 8/1/2023
234a		22CV019893				

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
235	366	Notice of Claim	In or around 1967, 1968,1969, 1970, 1971, 1972 and/or 1973	Chubb ack/ ROR 7/19/23 Lloyd's ack/ROR 11/29/23 AIG ack/ROR 9/28/23 Westport ack/ROR 12/27/23	10/14/2022 5/9/2023	AIG 7/14/2023 Chartis 8/1/2023
235a		22CV019899				Swiss Re 7/14/2023 8/1/2023 Chubb 7/14/2023 8/1/2023 OneBeacon 7/14/23
236	359	C22-02006	1971-1973	Chubb ack/ ROR 7/19/23 AIG ack/ROR 8/10/23 Lloyd's denial 11/29/23 Westport ack/ ROR 8/21/23	11/9/2022	AIG 7/14/2023 Swiss Re 7/14/2023 Chubb 7/14/2023 OneBeacon 7/14/2023
237	196	22CV015393	1974	Lloyd's ack/ROR 11/29/23 Westport ack/ROR 12/27/23	11/9/2022	CNA 7/14/2023 AIG 7/14/2023 Swiss Re 7/14/2023 OneBeacon 7/14/23
238	445	Notice of Claim	1967-1969	Chubb ack/ROR 7/19/23 Lloyd's ack/ROR 11/29/23	10/14/2022 2/23/2023	Chubb 7/14/2023 7/17/2023
238a		22CV020161				
239	182	Notice of Claim	1966-1969	Chubb ack/ROR 7/19/23 Lloyd's ROR 11/29/23	10/19/2022 2/27/2023	Chubb 7/14/2023 7/31/2023
239a		22CV020490				

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Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
240 240a	446	Notice of Claim 22CV021136	1989-1990	Lloyd's denial 11/29/23	10/19/2022 10/15/2023	
241 241a	206	Notice of Claim 22CV021944	1988-1990	Lloyd's denial 11/29/23	10/19/2022 2/27/2023	
242		Notice of Claim	1987-1989	Travelers ack/ROR 8/2/23	11/9/2022	Travelers 7/14/2023
243	391	Notice of Claim 22CV021635	1972-1977	Chubb ack/ ROR 7/19/23 AIG ack/ ROR 7/24/23 Lloyd's denial 11/29/23 Westport ack/ROR 12/27/23	11/28/2022	CNA 7/14/2023 Travelers 7/14/2023 AIG 7/14/2023 Swiss Re 7/14/2023 Chubb 7/14/2023 OneBeacon 7/14/23
244	424	Notice of Claim 22CV024005	1980	Travelers ack/ROR 8/2/23 Lloyd's denial 11/29/23 Chubb ack/ ROR 7/19/23	11/9/2023	CNA 7/14/2023 Travelers 7/14/2023 Chubb 7/14/2023
245 245a	394	Notice of Claim 22CV023397	1966-1968	Chubb: ack/ROR 7/23/2023 Lloyd's ack/ROR 11/29/23 Chubb ack 11/3/23	11/29/2022 10/18/2023	Chubb 7/16/2023
246	489	22CV013335	1971-1972	Chubb: ack/ROR 7/27/2023 Lloyd's denial 11/29/23 Chubb ack/ ROR 7/24/23 AIG ack/ROR 8/10/23	12/1/2022	AIG 7/16/2023 Swiss Re 7/16/2023

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
				Westport ack/ROR 12/27/23		Chubb 7/16/2023 OneBeacon 7/16/23
247		22CV013310	1977	Travelers ack/ROR 8/2/23 Lloyd's denial 11/29/23	12/1/2022	CNA 7/16/2023 Tavelers 7/16/2023
248	170	Notice of Claim 22CV023472	1962	Chubb ack/ROR 7/19/23 Lloyd's denial 11/29/23	11/29/2022	Chubb 7/16/2023
249	98	22CV017318	1975-1976	Travelers ack/ROR 8/2/23 Lloyd's denial 11/29/23 Westport ack/ROR 12/27/23	11/22/2022	CNA 7/14/2023 Travelers 7/14/2023 Swiss Re 7/14/2023 OneBeacon 7/14/23
250	362	C22-01820	1979-1980	Chubb ack/ROR 7/19/23 Lloyd's denial 11/29/23	11/22/2022	CNA 7/14/2023 Travelers 7/14/2023 Chubb 7/14/2023
251	253	Notice of Claim 22CV023961	1969-May 1980	Lloyd's denial 11/29/23		
252	443	22CV04375 (Santa Barbara)	1964-1966	Chubb ack/ ROR 7/19/23 Lloyd's ack/ROR 11/29/23 AIG ack/RoR 7/25/23 Westport ack/ROR 12/27/23	12/28/2022	AIG 7/16/2023 Swiss Re 7/16/2023 Chubb 7/16/2023
253	513	22CV014047	1967	Chubb: ack/ROR 7/27/2023 Lloyd's denial 11/29/23	12/28/2022	Chubb 7/16/2023

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
				Chubb ack/ ROR 7/24/23		
254	267	22CV017002	1984	Travelers ack/ROR 8/2/23 Lloyd's denial 11/29/23	1/24/2023	Travelers 7/14/2023
255	494	22CV024896	2003-2007	Lloyd's denial 11/29/23	1/24/2023	
256	231	22CV020746	1976-1978	Travelers ack/ROR 8/2/23 Lloyd's denial 11/29/23 Westport ack/ROR 12/27/23	1/25/2023	CNA 7/16/2023 Travelers 7/16/2023 Swiss Re 7/16/2023
257	226	22CV023763	1965-1966	Chubb ack/ROR 7/19/23 Lloyd's ack/ROR 11/29/23	1/25/2023	Chubb 7/17/2023
258	329	Mediation notice of claim 22CV019889	1976-1978	Chubb ack/ ROR 7/19/23 Lloyd's ack/ROR 11/29/23 AIG denial 8/2/23 Westport ack/ROR 12/27/23	5/30/2023 9/20/2022	Travelers 7/12/2023 8/1/2023 CNA 7/12/2023 8/1/2023 AIG 7/12/2023 Chartis 8/1/2023 Swiss Re 7/12/2023 8/1/2023 Chubb 7/12/2023 8/1/2023 OneBeacon 7/12/2023 8/1/2023
259	331	Mediation notice of claim 22CV019890	1974-1976	Travelers ack/ROR 8/2/23 AIG ack/ROR 8/7/23 Lloyd's ack/ROR 11/29/23 Westport ack/ROR 12/27/23	9/20/2022 5/30/2023	Travelers 7/12/2023 8/1/2023 CNA 7/12/2023

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
						8/1/2023 AIG 7/12/2023 Chartis 8/1/2023 Swiss Re 7/12/2023 8/1/2023 OneBeacon 7/12/2023 8/1/2023
260	356	Mediation notice of claim 22CV019949	1973-1974	AIG ack/ROR 8/7/23 Lloyd's ack/ROR 11/29/23 Westport ack/ROR 12/27/23	9/20/2022 5/31/2023	CNA 7/12/2023 8/1/2023 AIG 7/12/2023 Chartis 8/1/2023 Swiss Re 7/12/2023 8/1/2023 OneBeacon 7/12/2023 8/1/2023
261	354	Mediation notice of claim 22CV019944	1981-1982	Travelers ack/ROR 8/2/23 Chubb ack/ ROR 7/19/23 Lloyd's denial 11/29/23	9/20/2022 5/31/2023	Travelers 7/12/2023 8/1/2023 Chubb 7/12/2023 8/1/2023
262	330	Mediation notice of claim	1972	AIG ack/ROR 7/28/23 Lloyd's ack/ROR 11/29/23	9/20/2022 5/31/2023	AIG 7/14/2023

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
		22CV019888		Westport ack/ROR 12/27/23		Chartis 8/1/2023 Swiss Re 7/14/2023 8/1/2023 OneBeacon 7/14/2023 8/1/2023
263	351	Mediation notice of claim 22CV019943	1994-1995	Lloyd's denial 11/29/23	9/20/2022 5/31/2023	Not reported 7/13/2023
264	347	22CV017854	1960-1961	Lloyd's denial 11/29/23	5/31/2023	
265	450	22CV023416	1969-1970	Chubb ack/ROR 8/10/23 Lloyd's denial 11/29/23	5/31/2023	OneBeacon 8/1/2023 Chubb 8/1/2023
266	486	22CV018558	1976-1978	Travelers ack/ROR 8/2/23 Lloyd's denial 11/29/23	5/31/2023	CNA 8/1/2023 Travelers 8/1/2023 Swiss Re 8/1/2023
267	479	22CV024183	1977-1981	Chubb ack/ ROR 8/10/23 Lloyd's denial 11/29/23 Travelers ack/ ROR 8/11/23	5/31/2023	CNA 8/4/2023 Travelers 8/4/2023 Chubb 8/4/2023
268	403	22CV024635	1967	Chubb ack/ROR 8/10/23 Lloyd's denial 11/29/23	5/31/2023	Chubb 8/4/2023
269	469	22CV023091	1972-1974	AIG ack/ROR 9/28/23 Lloyd's denial 11/29/23	6/1/2023	Chartis 8/4/2023 CNA 8/4/2023 Swiss Re

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						8/4/2023 OneBeacon 8/4/2023
270	451	22CV022787	1969-1971	Chubb ack/ ROR 8/10/23 Lloyd's denial 11/29/23 AIG ack/ROR 9/28/23	6/1/2023	Chartis 8/4/2023 Chubb 8/4/2023 Swiss Re 8/4/2023 OneBeacon 8/4/2023
271	122	22CV020822	1971-1972	Chubb ack/ ROR 8/10/23 AIG ack/ROR 9/28/23 Lloyd's ack/ROR 11/29/23	6/1/2023	Chartis 8/4/2023 Chubb 8/4/2023 Swiss Re 8/4/2023 OneBeacon 8/4/2023
272	229	22CV020837	1978	Lloyd's denial 11/29/23	6/1/2023	CNA 8/4/2023 Travelers 8/4/2023
273	166	22CV023239	1974-1975	Travelers ack/ROR 8/2/23 Lloyd's ack/ROR 11/29/23 AIG ack/ROR 8/16/23 Westport ack/ROR 12/27/23	6/1/2023	CNA 7/12/2023 Travelers 7/12/2023 AIG 7/12/2023 Swiss Re 7/12/2023 OneBeacon 7/12/23
274	200	22CV021909	1976-1977	Travelers ack/ROR 8/11/23 Lloyd's denial 11/29/23	6/1/2023	CNA 8/4/2023 Travelers 8/4/2023 Swiss Re

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
						8/4/2023
275	307	22CV021229	Not disclosed in complaint	Chubb ack/ROR 10/27/23 AIG ack/ROR 10/27/23 Lloyd's ack/ROR 11/29/23	10/5/2023	We requested AJG tender to all policies for all years
276	90	22CV020632	Not disclosed in complaint	Chubb ack/ROR 10/27/23 Lloyd's ack/ROR 11/29/23 AIG ack/ROR 10/27/23	10/5/2023	We requested AJG tender to all policies for all years
277	176	22CV021959	Not disclosed in complaint	Lloyd's ack/ROR 11/29/23 AIG ack/ROR 11/13/32	10/5/2023	We requested AJG tender to all policies for all years
278	467	22CV020524	Not disclosed in complaint	Chubb ack 11/1/23 AIG ROR 11/13/23 Lloyd's ack/ROR 11/29/23	10/5/2023	We requested AJG tender to all policies for all years
279	89	22CV021619	Not disclosed in complaint	Chubb ack 11/1/23 Lloyd's ack/ROR 11/29/23 AIG ack/ROR 11/13/23	10/5/2023	We requested AJG tender to all policies for all years
280	232	22CV022330	Not disclosed in complaint	Chubb ack/ROR 11/1/23 Lloyd's ack/ROR 11/29/23	10/6/2023	We requested AJG tender to all policies for all years
281	178	22CV021958	Not disclosed in complaint	Chubb ack 11/1/23 Lloyd's ack/ROR 11/29/23	10/6/2023	We requested AJG tender to all policies for all years
282	270	22CV021982	Not disclosed in complaint	Chubb ack 11/1/23 AIG ack/ROR 11/21/23 Lloyd's ack/ROR 11/29/23	10/6/2023	We requested AJG tender to all policies for all years
283	117	22CV021962	Not disclosed in complaint	Chubb ack 11/1/23 AIG denial 11/13/23 Lloyd's denial 11/29/23	10/6/2023	We requested AJG tender to all policies for all years
284	458	22CV023092	Not disclosed in complaint	Chubb ack 11/1/23 AIG ROR 11/13/23 Lloyd's ROR 11/29/23	10/6/2023	We requested AJG tender to all policies for all years
285	164	22CV023077	Not disclosed in complaint	Chubb ack 11/1/23 Lloyd's ack/ROR 11/29/23 AIG ack/ror 11/13/2023	10/6/2023	We requested AJG tender to all policies for all years
286	264	22CV023536	Not disclosed in complaint	Chubb ack 11/1/23 AIG ack/ROR 11/13/23 Lloyd's ack/ROR 11/29/23	10/6/2023	We requested AJG tender to all policies for all years
287	179	22CV021953	Not disclosed in complaint	Chubb ack 11/1/23 Lloyd's denial 11/29/23 AIG ack/ROR 11/13/23	10/6/2023	We requested AJG tender to all policies for all years
288	180	22CV022583	Not disclosed in complaint	Chubb ack 11/1/23 Lloyd's denial 11/29/23 AIG ROR 11/13/23	10/6/2023	We requested AJG tender to all policies for all years

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
289	150	22CV024069	Not disclosed in complaint	Chubb ack 11/1/23 AIG denial 11/13/23 Lloyd's ack/ROR 11/29/23	10/6/2023	We requested AJG tender to all policies for all years
290	269	22CV023062	Not disclosed in complaint	TNCRRG denial AIG ack/ROR 12/5/23 Lloyd's ack/ROR 11/29/23 Travelers ack/ROR 12/19/23	10/6/2023	We requested AJG tender to all policies for all years
291	303	22CV021736	Not disclosed in complaint	Lloyd's denial 11/29/23	10/6/2023	We requested AJG tender to all policies for all years
292	336	22CV023423	Not disclosed in complaint	TNCRRG denial AIG denial/ROR 12/6/23 Lloyd's ack/ROR 11/29/23 Travelers ack/ROR 12/19/23	10/7/2023	We requested AJG tender to all policies for all years
293	320	22CV023960	1968-1970	AIG ack/ROR 12/4/23 Lloyd's ack/ROR 11/29/23 Travelers ack/ROR 12/19/23	10/7/2023	We requested AJG tender to all policies for all years
294	235	22CV023242	1973-1974	AIG ack/ROR 9/8/23 Lloyd's ack/ROR 11/29/23	8/29/2023	
295	447	22CV024880	1975	Lloyd's ack/ROR 11/29/23	8/29/2023	
296	477	22CV023669	1973-1983 AIG ack/ROR 9/28/23	Lloyd's ack/ROR 11/29/23	8/30/2023	
297	181	22CV022037	1974-1975 1977-1978	AIG ack/ROR 9/28/23 Travelers ack/ROR 9/5/23 Lloyd's ack/ROR 11/29/23	8/30/2023	
298	84	22CV021591	1974-1977	AIG ack/ROR 9/28/23 Lloyd's ack/ROR 11/29/23 Travelers ack/ROR 9/5/23	8/30/2023	
299	239	22CV020672	1962-1965	Chubb ack. 9/8/23 Lloyd's ack/ROR 11/29/23	9/1/2023	
300	251	22CV023538	1960-1961	Lloyd's ack/ROR 11/29/23	9/1/2023	
301	175	22CV023756	1993-1994	Lloyd's denial 11/29/23	9/1/2023	
302	463	22CV024587	1972-1974	Lloyd's ack/ROR 11/29/23	9/2/2023	
303	199	22CV024471	1970-1973	AIG ack/ROR 9/28/23 Lloyd's ack/ROR 11/29/23	10/4/2023	
304	116	22CV024532	1971, 1974-1975	Chubb ack 9/5/23	9/1/2023	

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
				Travelers ack/ROR 9/5/23 Lloyd's ack/ROR 11/29/23		
305	248	22CV022326	1974	TNCRRG denial AIG ack/ROR 12/5/23 Lloyd's ack/ROR 11/29/23 Travelers ack/ROR 12/19/23	10/7/2023	
306	230	22CV023400	1975-1976	TNCRRG denial AIG ack/ROR 12/4/23 Lloyd's ack/ROR 11/29/23 Travelers ack/ROR 12/19/23	10/7/2023	
307	265	22CV024846	1963-1964	Lloyd's ack/ROR 11/29/23	10/7/2023	
308	207	22CV021947	1965-1968	TNCRRG denial AIG ack/ROR 12/6/23 Lloyd's ack/ROR 11/29/23 Travelers ack/ROR 12/19/23	10/7/2023	
309	210	22CV024139	Not disclosed in complaint	TNCRRG ack. 11/1/23 Lloyd's denial 11/29/23 Travelers ack/ROR 12/19/23 AIG ack/ROR 12/4/23	10/7/2023	We requested AJG tender to all policies for all years
310	400	22CV024839	1975-1978	Travelers ack. 10/31/23 Lloyd's denial 11/29/23	10/7/2023	
311	233	22CV024838	1995-1997	**TNCRRG ack.** AIG denial 12/4/23 Lloyd's denial 11/29/23 Chubb ack/ROR 11/7/23	10/7/2023	
312	482 533	23CV025256	1996-2004	Lloyd's denial 11/29/23	10/8/2023	
313	459	22CV021946	1990-1993	Lloyd's denial 11/29/23	10/8/2023	
314	187	22CV023764	1985-1987	Chubb ack. 11/3/23 Lloyd's denial 11/29/23 Travelers ack/ROR 12/19/23	10/8/2023	
315	395	22CV022911	1971-1974	Chubb ack. 11/7/23 AIG ack/ROR 11/21/23 Lloyd's denial 11/29/23	10/8/2023	
316	197	22CV023068	1982-1984	TNCRRG denial AIG denial/ROR 12/6/23 Chubb ack/ROR 11/7/23 Lloyd's denial 11/29/23 Travelers ack/ROR 12/19/23	10/8/2023	
317	358	C22-02698	1980-1983	Chubb ack/ROR 11/7/23 Lloyd's denial 11/29/23	10/8/2023	

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
				Travelers ack/ROR 12/19/23		
318		22CV023623	1972-1978	Lloyd's denial 11/29/23 AIG ROR 12/18/23	10/16/2023	
319		22CV023968	1980s	Lloyd's denial 11/29/23 Chubb ack/ROR 11/10/23	10/16/2023	
320	261	22CV024931	1972-1973	AIG ack/ROR 12/6/23 Lloyd's denial 11/29/23	10/9/2023	
321	119	22CV022009	1974-1978	TNCRRG denial AIG ROR 12/6/23 Chubb ack/ROR 11/7/23 Lloyd's ack/ROR 11/29/23 Travelers ack/ROR 12/19/23	10/9/2023	
322	338	22CV022825	1972-1973	AIG ack/ROR 11/21/23 Lloyd's denial 11/29/23	10/9/2023	
323	441	22CV024898	1976-1978	Lloyd's denial 11/29/23	10/10/2023	
324	407	22CV024592	1973-1975	Lloyd's denial 11/29/23 Travelers ack/ROR 12/19/23	10/11/2023	
325	434	22CV024582	1969, 1973-1974	Chubb ack. AIG ack/ROR 12/6/23 Lloyd's denial 11/29/23	10/11/2023	
326	498 57	22CV023513	1970-1971	Chubb ack. 11/3/23 Lloyd's denial 11/29/23 AIG ROR 12/18/23	10/11/2023	
327	195	22CV022803	1973-1974	Lloyd's denial 11/29/23 AIG ack/ROR 12/18/23	10/11/2023	
328	252	22CV024472	1966-1968	TNCRRG denial Lloyd's ack/ROR 11/29/23 Chubb ack/ROR 11/10/23 Travelers ack/ROR 12/19/23 AIG ack/ROR 12/19/23	10/11/2023	
329	203	22CV024942	1972-1975	TNCRRG denial Lloyd's ack/ROR 11/29/23 AIG ROR 12/18/23 Chubb ack 11/10/23	10/11/2023	
330	72	22CV024465	1972-1973	Lloyd's denial 11/29/23 Chubb ack/ROR 11/10/23 AIG ack/ROR 12/19/23	10/11/2023	

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
331	173	22CV023950	1984	TNCRRG denial Lloyd's denial 11/29/23 Chubb ack/ROR 11/10/23 AIG ack/ROR 12/19/23	10/12/2023	
332	108	22CV024988	1972-1973	TNCRRG denial Lloyd's ROR 11/29/23 Chubb ack/ROR 11/10/23 AIG ack/ROR 12/19/23	10/12/2023	
333	115	22CV023240	1972-1975	TNCRRG denial Lloyd's ROR 11/29/23 Chubb ack/ROR 11/10/23 AIG ack/ROR 12/19/23	10/12/2023	
334	70	22CV022534	1971-1973	Lloyd's denial 11/29/23 Chubb ack/ROR 11/10/23 AIG ack/ROR 12/18/23	10/12/2023	
335	216	22CV024087	1974-1976	Travelers ack 11/2/23 Lloyd's denial 11/29/23 AIG denial 12/19/23	10/12/2023	
336	215	22CV024003	1969	Chubb ack. 11/3/23 Lloyd's preliminary denial 11/29/23	10/12/2023	
337	490	22CV022760	1952	Lloyd's denial 11/29/23	10/12/2023	Not reported
338	39	22CV022604	1984-1987	Lloyd's denial 11/29/23 Chubb ack/ROR 11/13/23	10/12/2023	
339	476	22CV024144	1983-1987	Chubb ack. 11/3/23 Travelers ack. 11/2/23 Lloyd's denial 11/29/23	10/12/2023	
340	59	Only POC	1961			
341	64	22CV027751	2013-2015			
342	75	22CV023329	1969-1970	Lloyd's denial 11/29/23		
343	100	22CV024022	1973-1976	Lloyd's denial 11/29/23		
344	101	22CV024630	1972-1975	Lloyd's denial 11/29/23		
345	168	22CV024859	1976-1978	Lloyd's denial 11/29/23		
346	188	22CV023766	1972-1973	Lloyd's denial 11/29/23		
347	190	22CV023502	1974-1975	Lloyd's denial 11/29/23		

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
348	204 191	22CV023676	1970-1973	Lloyd's denial 11/29/23		
349	194	22CV023501	1977	Lloyd's denial 11/29/23		
350	198 209	22CV024091	1985	Lloyd's denial 11/29/23		
351	201	Only POC	1972-1973			
352	202	22CV023509	1980-1982	Lloyd's denial 11/29/23		
353	205	22CV024945	1972-1975			
354	208	Only POC	1980-1982			
355	211	22CV024176	Unknown	Lloyd's ack/ROR 11/29/23		
356	212	22CV024031	1973-1974	Lloyd's denial 11/29/23		
357	213	Only POC	1998-1999			
358	214	22CV024195	1967-1968	Lloyd's ack/ROR 11/29/23		
359	218	22CV024154	1976-1977	Lloyd's denial 11/29/23		
360	222	22CV024200	1966	Lloyd's ack/ROR 11/29/23		
361	223	22CV024157	1974	Lloyd's denial 11/29/23		
362	224	22CV024400	1973-1974	Lloyd's denial 11/29/23		
363	225	22CV024749	1985-1986	Lloyd's denial 11/29/23		
364	227	Only POC	2012			
365	237	Only POC	1971-1972			
366	247	Only POC	Unknown			
367	263	22CV024385	1973-1980	Lloyd's denial 11/29/23		
368	266	22CV023759	1973-1975			
369	268	22CV021623	1969-1971			
370	274 442	22CV024854	1980-1982	Lloyd's denial 11/29/23		
371	281 276	Only POC	4/24/2021-5/30/2021			
372	283	Only POC	1990			
373	321	Only POC	1975-1982			
374	325	22CV024917	1971-1972			

Claimant No.	Proof of Claim No.	Case No.	Years of Alleged Abuse	Insurer Responses	Foley Tender to AJG Date	AJG Tendered to
375	328	22CV021441	1973	Lloyd's denial 11/29/23		
376	349	22CV023996	1979-1980	Lloyd's ROR 11/29/23		
377	357	22CV024669	1974-1975			
378	361	22CV024811	1968-1971	Lloyd's preliminary denial 11/29/23		
379	380	22CV023663	1978-1979	Lloyd's ack/ROR 11/29/23		
380	393	22CV017158	1979	Lloyd's denial 11/29/23		
381	398	22CV023717	1963-1968			
382	399	22CV024008	1974-1976	Lloyd's denial 11/29/23		
383	402	22CV024019	1961-1965	Lloyd's ack/ROR 11/29/23		
384	404	22CV020452	1974-1977			
385	411 34 38	22CV017589 22CV024556	1969-1973	Lloyd's denial 11/29/23		
386	416	22CV023199	1978-1979			
387	421	Only POC	Unknown			
388	422	22CV023195	1975	Lloyd's denial 11/29/23		
389	429	22CV023710	1988-1991	Lloyd's denial 11/29/23		
390	431	Only POC	1990-1991			
391	433	22CV024007	1958-1962	Lloyd's ack/ROR 11/29/23		
392	435	22CV024072	1973-1974			
393	436	22CV018779	1976	Lloyd's denial 11/29/23		
394	437	22CV012226	1973	Lloyd's denial 11/29/23		
395	438 537	Only POC	Unknown			
396	439	Only POC	Unknown			
397	440	Only POC	Unknown			
398	452	22CV021615	1990-2000			
399	466	22CV024510	1974-1975			

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400	480 531	22CV024892	1981-1983	Lloyd's denial 11/29/23		
401	481	22CV018715	1972	Lloyd's denial 11/29/23		
402	487	Only POC	1977-1978			
403	488	Only POC	1978			
404	492	23CV036395	1995-1996	Lloyd's denial 11/29/23		
405	493 277	Only POC	1998-1999			
406	499	22CV024847	1955-1956			
407	502	22CV023684	1983-1985			
408	507 449	22CV024730	Unknown			
409	509	Only POC	Unknown			
410	527	RG20062996	2016-2017	Lloyd's denial 11/29/23		
411	542	Only POC	Unknown			