

05 NOV -7 P4:26

LODGED \_\_\_\_\_ REC'D \_\_\_\_\_  
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8

9 IN THE UNITED STATES BANKRUPTCY COURT  
10 FOR THE DISTRICT OF OREGON

11 In re:

12 ROMAN CATHOLIC ARCHBISHOP OF  
PORTLAND IN OREGON, AND  
13 SUCCESSORS, a corporation sole, dba the  
ARCHDIOCESE OF PORTLAND IN  
14 OREGON,

15 Debtor.

No. 04-37154-elp11

**SECOND DECLARATION OF  
MARGARET HOFFMANN**

17 I, Margaret Hoffmann, declare under penalty of perjury under the laws of the  
18 United States of America and the State of Oregon that the following is true and correct:

19 1. I am one of the attorneys at this law firm having responsibility for the  
20 handling of claims against the Archdiocese of Portland, including claims alleging sexual  
21 misconduct. In the course of that representation, I have become familiar with the factual  
22 circumstances of the tort claimants against the Debtor by review of pladings, taking  
23 depositions, review of transcripts, summaries, proofs of claim, reports and other  
24 information.

25 2. Attached to this Declaration are copies of the Complaints that 206 tort  
26 claimants previously filed in various state circuit courts, alleging sexual misconduct by

**I CERTIFY THAT THIS IS A TRUE COPY OF THE ORIGINAL AND OF THE WHOLE THEREOF**  
SCHWABE, WILLIAMSON & WYATT, P.C.  
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1 agents of the Archdiocese of Portland in Oregon. In every single one of these  
2 Complaints, claimants assert that, at the time of the alleged sexual misconduct, they were  
3 members of or associated with the Roman Catholic Church, primarily through attendance  
4 at a Catholic school and/or parish church within the Archdiocese. For example, many of  
5 the attached Complaints allege that the claimants were altar boys in their parish churches  
6 or students at Catholic schools, and/or they, their siblings, and their parents were  
7 parishioners where the accused priest or alleged agent of the Archdiocese was located.  
8 Each and every one of the claimants referenced in the attached Complaints alleged that  
9 the claimant was a practicing Catholic or was otherwise involved in a Catholic school or  
10 Catholic parish church within the Archdiocese of Portland when the alleged sexual  
11 misconduct occurred.

12 3. The case name, case number, and jurisdiction of each attached Complaint is  
13 listed below:

14	<b>CASE NAME</b>	<b>CASE NUMBER</b>	<b>JURISDICTION</b>
15			
16	D.H., et al. v. The	99-12-13591	Multnomah County Circuit
17	Archdiocese of Portland in		Court
18	Oregon, et al.		
19	D.B., et al. v. The	0005 05449	Multnomah County Circuit
20	Archdiocese of Portland in		Court
21	Oregon, et al.		
22	B.B., et al. v. The	0005-05448	Multnomah County Circuit
23	Archdiocese of Portland in		Court
24	Oregon, et al.		
25	John Doe 1 (Perone), et al.	0207-07404	Multnomah County Circuit
26	v. The Archdiocese of		Court
	Portland in Oregon, et al.		

	CASE NAME	CASE NUMBER	JURISDICTION
1			
2	P.H., M.D., et al. v. The	0203-02664	Multnomah County Circuit
3	Archdiocese of Portland in		Court
4	Oregon, et al.		
5	D.B. v. The Missionary	0506-06393	Multnomah County Circuit
6	Society of St. Paul The		Court
7	Apostle, in the State of		
8	Oregon, et al.		
9	S.E., et al. v. The	0301-00132	Multnomah County Circuit
10	Archdiocese of Portland in		Court
11	Oregon, et al.		
12	John Doe, aka B.J.G. v. The	020504941	Multnomah County Circuit
13	Archdiocese of Portland in		Court
14	Oregon, et al.		
15	Steven Fearing v. The	9412-08665	Multnomah County Circuit
16	Archdiocese of Portland in		Court
17	Oregon, et al.		
18	Sarah Smith v. The	0208-07778	Multnomah County Circuit
19	Archdiocese of Portland in		Court
20	Oregon, et al.		
21	John v. Doe v. The	CV 02 430 MO	United States District Court,
22	Archdiocese of Portland in		District of Oregon
23	Oregon, et al.		
24	J.W. v. The Archdiocese of	0208-08304	Multnomah County Circuit
25	Portland in Oregon, et al.		Court
26			
27	B.C., et al. v. The	01CV0605AB	Deschutes County Circuit
28	Archdiocese of Portland in		Court
29	Oregon, et al.		
30	M.B., et al. v. The	0210-10399	Multnomah County Circuit
31	Archdiocese of Portland, et		Court
32	al.		
33			

1	CASE NAME	CASE NUMBER	JURISDICTION
2	M.K. v. The Archdiocese of	01909-09692	Multnomah County Circuit
3	Portland in Oregon, et al.		Court
4	D.J., et al. v. The	0008-07885	Multnomah County Circuit
5	Archdiocese of Portland in		Court
6	Oregon, et al.		
6	John Doe aka L.E.D. v. The	020504252	Multnomah County Circuit
7	Archdiocese of Portland in		Court
8	Oregon, et al.		
9	John Doe aka R.J.D. v. The	02C13804	Marion County Circuit
10	Archdiocese of Portland in		Court
10	Oregon, et al.		
11	Fred Grgich v. The	A8508-04830	Multnomah County Circuit
12	Archdiocese of Portland in		Court
12	Oregon, et al.		
13	G.B. v. The Archdiocese of	0108-08315	Multnomah County Circuit
14	Portland in Oregon, et al.		Court
15	D.A. v. The Archdiocese of	0107-07465	Multnomah County Circuit
16	Portland in Oregon, et al.		Court
17	Sheilah M. Callahan v. The	0211-11687	Multnomah County Circuit
18	Archdiocese of Portland in		Court
18	Oregon, et al.		
19	D.R. One v. The	16-00-07491	Lane County Circuit Court
20	Archdiocese of Portland in		
20	Oregon, et al.		
21	D.R. Two v. The	00-05-04443	Multnomah County Circuit
22	Archdiocese of Portland in		Court
22	Oregon, et al.		
23	Joan Doe v. Jeanne Clare	0507-07194	Multnomah County Circuit
24	Frolick, et al.		Court
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26			

	CASE NAME	CASE NUMBER	JURISDICTION
1			
2	James LaFortune v. Friar	0410-10159	Multnomah County Circuit
3	Ronald James Anthony		Court
4	Warren		
5	J.C.M. v. The Archdiocese	0304-03718	Multnomah County Circuit
6	of Portland in Oregon, et al.		Court
7	Teresa Seely v. The	CIV02-1994 PHX PGR	United States District Court,
8	Archdiocese of Portland in		District of Arizona
9	Oregon, et al.		
10	C.B. v. The Archdiocese of	0107-07514	Multnomah County Circuit
11	Portland in Oregon, et al.		Court
12	S.N.B. v. The Archdiocese	0308 08539	Multnomah County Circuit
13	of Portland in Oregon, et al.		Court
14	G.B. v. The Archdiocese of	0210-10493	Multnomah County Circuit
15	Portland in Oregon, et al.		Court
16	J.R.C. v. The Archdiocese	020706685	Multnomah County Circuit
17	of Portland in Oregon, et al.		Court
18	R.D. v. The Archdiocese of	0209-09453	Multnomah County Circuit
19	Portland in Oregon, et al.		Court
20	Jane Does aka M.F. and	02C20827	Marion County Circuit
21	C.M. v. The Archdiocese of		Court
22	Portland in Oregon, et al.		
23	Andrew John Fletcher v.	02C13603	Marion County Circuit
24	The Archdiocese of		Court
25	Portland in Oregon, et al.		
26	B.G. v. The Archdiocese of	0306-06691	Multnomah County Circuit
	Portland in Oregon, et al.		Court
	John Doe 104 v. The	030384	Lincoln County Circuit
	Archdiocese of Portland in		Court
	Oregon, et al.		

	CASE NAME	CASE NUMBER	JURISDICTION
1			
2	C.K.P. v. The Archdiocese	0208-08599	Multnomah County Circuit
3	of Portland in Oregon, et al.		Court
4	M.M. v. The Archdiocese of	0405-05450	Multnomah County Circuit
5	Portland in Oregon, et al.		Court
6	M.M. v. The Archdiocese of	0208-08680	Multnomah County Circuit
7	Portland in Oregon, et al.		Court
8	J.L. v. The Archdiocese of	0207-07139	Multnomah County Circuit
9	Portland in Oregon, et al.		Court
10	R.H. v. The Archdiocese of	0204-03882	Multnomah County Circuit
11	Portland in Oregon, et al.		Court
12	H.S. 2 v. The Archdiocese	0405-05518	Multnomah County Circuit
13	of Portland in Oregon, et al.		Court
14	F.M. v. The Archdiocese of	0405-05448	Multnomah County Circuit
15	Portland in Oregon, et al.		Court
16			
17	P.I., et al. v. The	0111-11310	Multnomah County Circuit
18	Archdiocese of Portland in		Court
19	Oregon, et al.		
20	C.M. v. The Archdiocese of	0206-05752	Multnomah County Circuit
21	Portland in Oregon, et al.		Court
22	W.B. v. The Archdiocese of	C04-05-05550	Multnomah County Circuit
23	Portland in Oregon, et al.		Court
24	P.C. v. The Archdiocese of	0309-10146	Multnomah County Circuit
25	Portland in Oregon, et al.		Court
26			

	CASE NAME	CASE NUMBER	JURISDICTION
1			
2			
3	B.M.L. v. The Archdiocese of Portland in Oregon, et al.	0405-05278	Multnomah County Circuit Court
4			
5	D.C. v. The Archdiocese of Portland in Oregon, et al.	0312-13052	Multnomah County Circuit Court
6			
7	David Coombs v. The Archdiocese of Portland in Oregon, et al.	0402-01555	Multnomah County Circuit Court
8			
9			
10	J.C. v. The Archdiocese of Portland in Oregon, et al.	0406-05598	Multnomah County Circuit Court
11			
12	A.G.Y., et al. v. The Archdiocese of Portland in Oregon, et al.	0401-00895	Multnomah County Circuit Court
13			
14			
15	D.M. v. The Archdiocese of Portland in Oregon, et al.	0405-05449	Multnomah County Circuit Court
16			
17	L.D. v. The Archdiocese of Portland in Oregon, et al.	0303-02379	Multnomah County Circuit Court
18			
19			
20	Greg A. Farris v. The Archdiocese of Portland in Oregon, et al.	0404-03998	Multnomah County Circuit Court
21			
22			
23	M.S. v. The Archdiocese of Portland in Oregon, et al.	0301-00239	Multnomah County Circuit Court
24			
25	G.G. v. The Archdiocese of Portland in Oregon, et al.	0406-06296	Multnomah County Circuit Court
26			

	CASE NAME	CASE NUMBER	JURISDICTION
1			
2			
3	R.W.F. v. The Archdiocese of Portland in Oregon, et al.	0208-08389	Multnomah County Circuit Court
4			
5	H.S. v. The Archdiocese of Portland in Oregon, et al.	0405-05447	Multnomah County Circuit Court
6			
7	Timothy McKenna v. The Archdiocese of Portland in Oregon, et al.	04-2-01739-4SEA	King County Superior Court, State of Washington
8			
9	S.W., et al. v. The Archdiocese of Portland in Oregon, et al.	0402-01868	Multnomah County Circuit Court
10			
11	John Smith v. The Archdiocese of Portland in Oregon, et al.	0312-13337	Multnomah County Circuit Court
12			
13	John Doe aka J.P.R. v. Martin Thielen, a living Catholic Priest	0410-10160	Multnomah County Circuit Court
14			
15			
16	M.S. v. The Archdiocese of Portland in Oregon, et al.	0110-11159	Multnomah County Circuit Court
17			
18	Richard Renne v. The Archdiocese of Portland in Oregon, et al.	0106-06472	Multnomah County Circuit Court
19			
20	Jane Doe 102 v. The Archdiocese of Portland in Oregon, et al.	0207-07372	Multnomah County Circuit Court
21			
22	Jane Doe 103 v. The Archdiocese of Portland in Oregon, et al.	0207-07371	Multnomah County Circuit Court
23			
24			
25	John Doe aka R.J.K. v. The Archdiocese of Portland in Oregon, et al.	02C20829	Marion County Circuit Court
26			



	CASE NAME	CASE NUMBER	JURISDICTION
1			
2	Jane Doe 101 v. The	0207-07373	Multnomah County Circuit
3	Archdiocese of Portland in		Court
4	Oregon, et al.		
5	Rita Cernyar, et al. v. The	02C20828	Marion County Circuit
6	Archdiocese of Portland in		Court
7	Oregon, et al.		
8	J.S. v. The Archdiocese of	C04-05-05551	Multnomah County Circuit
9	Portland in Oregon, et al.		Court
10	K.N., et al. v. The	0404-03644	Multnomah County Circuit
11	Archdiocese of Portland in		Court
12	Oregon, et al.		
13	L.H., et al. v. The	0210-10429	Multnomah County Circuit
14	Archdiocese of Portland in		Court
15	Oregon, et al.		
16	Thomas H. Heidt, et al. v.	02C20830	Marion County Circuit
17	The Archdiocese of		Court
18	Portland in Oregon, et al.		
19	M.L. v. The Archdiocese of	020504867	Multnomah County Circuit
20	Portland in Oregon, et al.		Court
21	C.A.J., et al. v. The	0206-06327	Multnomah County Circuit
22	Archdiocese of Portland in		Court
23	Oregon, et al.		
24	Tom Barnett v. The	0205-04434	Multnomah County Circuit
25	Archdiocese of Portland in		Court
26	Oregon, et al.		
27	B.B., et al. v. The	0202-01512	Multnomah County Circuit
28	Archdiocese of Portland in		Court
29	Oregon, et al.		
30	W.B., et al. v. The	0105-04547	Multnomah County Circuit
31	Archdiocese of Portland in		Court
32	Oregon, et al.		

	CASE NAME	CASE NUMBER	JURISDICTION
1			
2	J.C.1, et al. v. The	0105-04547	Multnomah County Circuit
3	Archdiocese of Portland in		Court
4	Oregon, et al.		
5	Thomas J. Brown v. The	A8909-05293	Multnomah County Circuit
6	Archdiocese of Portland in		Court
7	Oregon, et al.		
8	J.C.2, et al. v. The	0105-04546	Multnomah County Circuit
9	Archdiocese of Portland in		Court
10	Oregon, et al.		
11	A.C. v. The Archdiocese of	0111-11510	Multnomah County Circuit
12	Portland in Oregon, et al.		Court
13	M.E.G. v. The Archdiocese	0211-11294	Multnomah County Circuit
14	of Portland in Oregon, et al.		Court
15	T.H. v. The Archdiocese of	0111-11511	Multnomah County Circuit
16	Portland in Oregon, et al.		Court
17	Vernon Howell v. The	0210-10149	Multnomah County Circuit
18	Archdiocese of Portland in		Court
19	Oregon, et al.		
20	J.A. v. The Archdiocese of	0205-04638	Multnomah County Circuit
21	Portland in Oregon, et al.		Court
22	P.M. v. The Archdiocese of	0212-12358	Multnomah County Circuit
23	Portland in Oregon, et al.		Court
24	Allen Dale Potts v. The	0205-04309	Multnomah County Circuit
25	Archdiocese of Portland in		Court
26	Oregon, et al.		
	J.W. v. The Archdiocese of	0208-08304	Multnomah County Circuit
	Portland in Oregon, et al.		Court
	B.C., et al. v. The	01CV0605AB	Deschutes County Circuit
	Archdiocese of Portland in		Court
	Oregon, et al.		

	CASE NAME	CASE NUMBER	JURISDICTION
1			
2	Sarah Smith v. The	0208-07778	Multnomah County Circuit
3	Archdiocese of Portland in		Court
4	Oregon, et al.		
5	David Schmidt, et al. v. The	0204-03531	Multnomah County Circuit
6	Archdiocese of Portland in		Court
7	Oregon, et al.		
8	John Doe 105 v. The	030385	Lincoln County Circuit
9	Archdiocese of Portland in		Court
10	Oregon, et al.		

Dated this 7<sup>th</sup> day of November 2005.

SCHWABE, WILLIAMSON & WYATT, P.C.

By: Margaret Hoffman  
 Margaret Hoffman, OSB #90145  
 Special Counsel for Debtor and  
 Debtor-In-Possession

1 CERTIFICATE OF SERVICE

2 I certify that on November 7, 2005, I served **by first class mail**, a full and correct  
3 copy of the foregoing **SECOND DECLARATION OF MARGARET HOFFMANN**  
4 **(WITHOUT EXHIBITS)** to the interested parties of record, addressed as follows:

5 **PLEASE SEE ATTACHED LIST OF INTERESTED PARTIES**

6 The following parties were served the **SECOND DECLARATION OF**  
7 **MARGARET HOFFMANN (WITH EXHIBITS).**

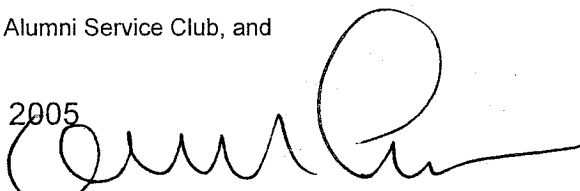
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16 St. Anthony Church (Tigard), As Represented By Its Pastor, Rev. Leslie  
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Dated: November 7, 2005

  
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