

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

IN RE:) Case No. 26-31894
)
LOURDES UNIVERSITY,) CHAPTER 11
)
Debtor-in-Possession.) Judge May Ann Whipple

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

IN RE:) Case No. 26-31895
)
LOURDES PROPERTIES, LLC,) CHAPTER 11
)
Debtor-in-Possession.) Judge May Ann Whipple

**MOTION OF DEBTORS FOR ENTRY OF ORDER DIRECTING JOINT
ADMINISTRATION OF RELATED CHAPTER 11 CASES**

Lourdes University (the “University”) and Lourdes Properties, LLC (“Lourdes Properties”) and together with the University, the “Debtors”), as debtors and debtors-in-possession in the above captioned chapter 11 cases, pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 9013-1 of the Local Bankruptcy Rules for the Northern District of Ohio (the “Local Rules”), respectfully represent as follows in support of this motion (the “Motion”):

Background

1. On August 10, 2026 (the “Petition Date”), each of the Debtors filed a voluntary petition for relief under Title 11 of the United States Code, 11 U.S.C. § 101 *et seq.* (the “Bankruptcy Code”). The Debtors are authorized to continue to operate their business and

manage their properties as debtors-in-possession pursuant to section 1107(a) and 1108 of the Bankruptcy Code. No trustee, examiner, or statutory committee of creditors has been appointed in these chapter 11 cases.

2. The University is a private Catholic liberal arts university located in Sylvania, Ohio, sponsored by the Sisters of St. Francis of Sylvania, Ohio.

3. Lourdes University, an Ohio nonprofit corporation (the “University”), has been a sponsored ministry of the Sisters of St. Francis, Sylvania Ohio (“SOSF”) for the past 68 years. The University began as a Junior College, eventually becoming a College and later a University. Over the past ten years, the University has struggled financially and survived only by increasingly large financial contributions and loans from the SOSF. As the Sisters themselves have aged and their community has diminished in number, this financial burden has become untenable. Accordingly, Lourdes University is in the process of closing, and its insolvency cannot be mitigated or addressed other than through bankruptcy proceedings.

4. Additional information regarding the Debtors’ business, properties, and the circumstances leading to the commencement of these chapter 11 cases is set forth in the Declaration of Sister Nancy Linenkugel, OSF, DM filed on the Petition Date, and is fully incorporated herein by reference.

Jurisdiction

5. The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

Relief Requested

6. By this Motion, pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), the Debtors request entry of an order directing joint administration of these chapter 11 cases for procedural purposes only.

7. In addition, the Debtors respectfully request that the Court maintain one file and one docket for each of the jointly administered cases under the case number assigned to Lourdes University, and that these chapter 11 cases be jointly administered under the following consolidated caption:

IN THE UNITED STATES BANKRUPTCY COURT
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IN RE:	)	Case No. 26-31894
	)	
LOURDES UNIVERSITY and	)	CHAPTER 11
LOURDES PROPERTIES, LLC,	)	
Jointly Administered Debtors-in-Possession.)	)	Judge May Ann Whipple

8. The Debtors further request that the Court direct that a notation substantially similar to the following language be entered on the docket maintained by the Clerk of the Court to reflect the joint administration of the Debtors’ chapter 11 cases:

An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure directing the procedural consolidation and joint administration of the chapter 11 cases of Lourdes University and Lourdes Properties, LLC. The docket in case number 26-31894 (MAW) should be consulted for all matters affecting the cases.

9. Finally, because the expenses paid by the University and Properties are interconnected, to the extent it serves the purpose of efficient administration of these chapter 11 cases, and because the pre-petition financial statements of the Debtors are consolidated, they

seek authority, but not direction, to file the monthly operating reports required by the Operating Guidelines and Reporting Requirements for Debtors in Possession and Trustees, issued by the Office of the United States Trustee on a consolidated basis.

10. A proposed form of order granting the relief requested herein is annexed hereto as **Exhibit A** (the “Proposed Order”).

Relief Requested Should be Granted

11. Joint administration will allow for the efficient and convenient administration of the Debtors’ interrelated chapter 11 cases, will yield significant cost savings, and will not prejudice the substantive rights of any party in interest.

12. Bankruptcy Rule 1015(b) provides: in relevant part, that if “two or more petitions are pending in the same court by or against...a debtor and an affiliate, the court may order a joint administration of the estates.” Fed. R. Bankr. P. 1015(b). The Debtors are both under common ownership, and therefore, are “affiliates” (as defined in section 101(2) of the Bankruptcy Code). Accordingly, the Court is authorized to grant the relief requested herein.

13. Joint administration of these chapter 11 cases will save the Debtors and their estates substantial time and expense by removing the need to prepare, replicate, file, and serve duplicative notices, applications, and orders. Furthermore, joint administration will relieve the Court of entering duplicative orders and maintaining duplicative files and dockets. The United States Trustee for the Northern District of Ohio, Western Division and other parties in interest will similarly benefit from joint administration of these chapter 11 cases, as it will spare them from the time and effort of reviewing duplicative pleadings and papers.

14. The relief requested herein has been granted in similar Chapter 11 cases in this District. *See, e.g., AmTrust Financial Corp., et al.*, Case No. 09-21323 (PMC) (Bankr. N.D. Ohio

December 7, 2009) [Docket No. 37], *Forum Health, et al.*, Case No. 09-40795 (KW) (Bankr. N.D. Ohio March 17, 2009) [Docket No. 49], *Schwab Industries, Inc., et al.*, Case No. 10-60702 (RK) (Bankr. N.D. Ohio March 3, 2010) [Docket No. 41], *CEP Holdings, LLC, et al.*, Case No. 06-51848 (MSS) (Bankr. N.D. Ohio September 26, 2006) [Docket No. 68], and *Nexpak Corp. et al.*, No. 04-63816 (RK) (Bankr. N.D. Ohio July 19, 2004) [Docket No. 34].

15. Moreover, joint administration will not adversely affect the Debtors' respective constituencies because this Motion only requests administrative, and not substantive, consolidation of the Debtors' estates. For example, any creditor may still file a claim against either Debtor or its estate (or against both Debtors and their respective estates), intercompany claims (to the extent existing) among the Debtors will not be affected by the relief requested herein, and the Debtors will maintain separate records of assets and liabilities.

Notice

16. Notice of this Motion has been provided to (i) the Office of the U.S. Trustee for the Northern District of Ohio (the "U.S. Trustee"); (ii) each of the Debtors' twenty (20) largest unsecured creditors; (iii) counsel for Signature Bank; (iv) counsel for the Trustee for the Bondholders; (v) counsel for the proposed DIP Lender; and (vi) any other party who has requested to receive notices in this case. The Debtors submit that, under the circumstances, no other or further notice is required.

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WHEREFORE, the Debtors respectfully request entry of an order granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

Dated: Uniondale, New York
August 10, 2026

Cullen and Dykman LLP

By: /s/ Bonnie L. Pollack

Bonnie L. Pollack, Esq.

Matthew G. Roseman, Esq. (N. Dist. of Ohio Bar No. NY2239903; NY Bar No. 2239903)

Bonnie L. Pollack, Esq. (N. Dist. of Ohio Bar No. NY2306686; NY Bar No. 2306686)

Kyriaki Christodoulou, Esq. (N. Dist. of Ohio Bar No. NY5856893; NY Bar No. 5856893)

333 Earle Ovington Boulevard, 2nd Floor

Uniondale, New York 11553

mroseman@cullenllp.com

bpollack@cullenllp.com

kchristodoulou@cullenllp.com

(516) 357-3700

-and-

Marshall & Melhorn, LLC

Henry J. Geha III, Esq. (Ohio Bar No. 0081713)

Four Seagate, 8th Floor

Toledo, Ohio 43604

(419) 249-7100

Geha@marshall-melhorn.com

Proposed Attorneys for Lourdes University and Lourdes Properties, LLC

Exhibit A

Proposed Order

IN THE UNITED STATES BANKRUPTCY COURT
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	)	
LOURDES UNIVERSITY,	)	CHAPTER 11
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Debtor-in-Possession.	)	Judge May Ann Whipple

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LOURDES PROPERTIES, LLC,	)	CHAPTER 11
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Debtor-in-Possession.	)	Judge May Ann Whipple

ORDER DIRECTING JOINT ADMINISTRATION OF RELATED CHAPTER 11 CASES

Upon the motion (“Motion”)¹ of Lourdes University and Lourdes Properties, LLC, the above-captioned debtors and debtors-in-possession (the “Debtors”), pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 9013-1 of the Local Bankruptcy Rules for the Northern District of Ohio (the “Local Rules”) for entry of an order directing the joint administration of the Debtors’ related chapter 11 cases for procedural purposes only, all as more fully set forth in the Motion; and the Court having jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Motion and the requested relief being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due and proper notice of the Motion having been provided to the parties entitled to notice thereof, and such notice having been adequate and appropriate under the circumstances, and it appearing that no other or further notice need be provided; and the Court having reviewing the Motion; and the Court having held a hearing to consider the relief requested in the Motion (the “Hearing”), and the record of the Hearing; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and it appearing that the relief requested in the Motion is in the best interests of the Debtors, their estates, creditors, and all parties in interest; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is granted to the extent set forth herein.

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

2. The Debtors' chapter 11 cases are hereby consolidated for procedural purposes only and shall be jointly administered by the Court.

3. Nothing contained in this Order shall be deemed or construed as directing or otherwise implying the substantive consolidation of the Debtors' chapter 11 cases.

4. The caption of the jointly administered cases shall read as follows:

IN THE UNITED STATES BANKRUPTCY COURT
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	)	
LOURDES UNIVERSITY and	)	CHAPTER 11
LOURDES PROPERTIES, LLC,	)	
Jointly Administered Debtors-in-Possession	)	Judge May Ann Whipple

5. A docket entry shall be made in the chapter 11 cases of the Debtors substantially as follows:

An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure directing the procedural consolidation and joint administration of the chapter 11 cases of Lourdes University and Lourdes Properties, LLC. The docket in case number 26-31894 (MAW) should be consulted for all matters affecting the cases.

6. To the extent it serves the purpose of efficient administration of these chapter 11 cases, the Debtors may file their monthly operating reports required by the Chapter 11 Operating Instructions and Reporting Requirements, issued by the Office of the United States Trustee,

7. The Debtors are authorized to take all action necessary to effectuate the relief granted in this Order.

8. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and/or enforcement of this Order.