

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

**DEBTORS' MOTION FOR EXPEDITED HEARING ON EMERGENCY MOTIONS
AND FIRST DAY PLEADINGS**

Lourdes University (the "University") and Lourdes Properties ("LP"), the above-captioned debtors and debtors-in-possession (each a "Debtor" and collectively, the "Debtors"), by and through their proposed attorneys Cullen and Dykman LLP, hereby move the Court for an expedited hearing as soon as the Court's calendar permits on the following Motions and Applications (the "First Day Pleadings")¹:

1. Motion for Joint Administration;
2. Motion for Authority to Obtain Post-Petition Financing and Use of Cash Collateral
(on an interim basis);

¹ Some of the First Day Pleadings will be filed later than the others. In addition, there are other motions that are being filed for which the Debtors are not seeking an expedited hearing.

3. Motion to Pay Pre-Petition Wages and Benefits;
4. Motion to Continue Cash Management System;
5. Motion to Extend Time to File Schedules and Statements;
6. Motion Establishing Notice Procedures;
7. Motion to Continue to Maintain Pre-Petition Insurance Policies (on an interim basis);
and
8. Motion to Provide Adequate Assurance to Utilities (on an interim basis).

For cause, the Debtors state that an immediate determination of the First Day Pleadings is necessary to enable them to operate in Chapter 11 with minimum disruption and loss of employees, services and productivity. The Debtors have served all First Day Pleadings and this Motion on: (i) the U.S. Trustee; (ii) counsel to the Bond Trustee; (iii) counsel to Signature Bank; (iv) counsel to the proposed DIP Lender; (v) those entities or individuals listed on the Debtors' lists of 20 largest unsecured creditors; and (vi) all known parties asserting a lien against or security interest in either Debtor's assets.

WHEREFORE, the Debtors request that the Court schedule an expedited hearing on the First Day Pleadings specified above, and enter the proposed Order annexed hereto as **Exhibit A**, as soon as the Court's calendar will permit.

Dated: Uniondale, New York
August 10, 2026

Cullen and Dykman LLP

By: /s/ Bonnie L. Pollack

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EXHIBIT A

Proposed Order

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IN RE:	)	Case No. 26-31895
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**ORDER GRANTING DEBTORS' MOTION FOR EXPEDITED HEARING ON
EMERGENCY MOTIONS AND FIRST DAY PLEADINGS**

THIS MATTER came before the Court upon the Motion for Expedited Hearing dated August 10, 2026 by Lourdes University (the "University") and Lourdes Properties ("LP"), the above-captioned debtors and debtors-in-possession (each a "Debtor" and collectively, the

“Debtors”), by and through their proposed attorneys Cullen and Dykman LLP, for an emergency hearing on the following Motions (the “First Day Pleadings”)¹:

1. Motion for Joint Administration;
2. Motion for Authority to Obtain Post-Petition Financing and Use of Cash Collateral (on an interim basis);
3. Motion to Pay Pre-Petition Wages and Benefits;
4. Motion to Continue Cash Management System;
5. Motion to Extend Time to File Schedules and Statements;
6. Motion Establishing Notice Procedures;
7. Motion to Continue to Maintain Pre-Petition Insurance Policies (on an interim basis);
- and
8. Motion to Provide Adequate Assurance to Utilities (on an interim basis).

There being due notice under the circumstances, and sufficient cause appearing, it is hereby

ORDERED that the Motion for Expedited Hearing is approved and the hearing on the First Day Pleadings is set for August ___, 2026 at __:___ a./p.m. at the United States Bankruptcy Court, 455 Federal Building, 2 South Main Street, Akron, OH 44308.

IT IS SO ORDERED.

Submitted by:

Cullen and Dykman LLP

By: _____

Bonnie L. Pollack, Esq.

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

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