

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

IN RE:) Case No. 26-31894
)
LOURDES UNIVERSITY and) CHAPTER 11
LOURDES PROPERTIES, LLC, ¹,)
Jointly Administered Debtors-in-Possession) Judge Mary Ann Whipple

**APPLICATION FOR ENTRY OF AN ORDER
ESTABLISHING DEADLINE FOR FILING PROOFS OF CLAIM
AND APPROVING THE FORM AND MANNER OF NOTICE THEREOF**

Lourdes University (the “University”) and Lourdes Properties, LLC, (“Properties”), the above-captioned debtors and debtors-in-possession (the “Debtors”), by and through their proposed attorneys, Cullen and Dykman LLP, hereby move (this “Motion”) pursuant to sections 105, 501, 502, 503(a), and 1111(a) of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.* (the “Bankruptcy Code”), Rules 2002(a)(7), 3003(c)(3), and 5005(a) 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, in substantially the form annexed hereto as **Exhibit A** (the “Bar Date Order”), (a) fixing a deadline by which proofs of claim against the Debtors’ bankruptcy estates must be filed; (b) establishing procedures for filing proofs of claim and approving the form and manner of notice thereof; and (c) granting related relief. In support of this Motion, the Debtors respectfully state as follows:

¹ The Debtors in these chapter 11 cases along with the last four digits of each Debtor’s federal tax identification number are: Lourdes University (6547); and Lourdes Properties, LLC (8998). The location of the Debtors’ principal place of business is 6832 Convent Blvd., Sylvania, Ohio 43560.

JURISDICTION AND VENUE

1. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

2. The statutory and rule-based predicates for the relief sought herein are sections 105, 107, 501, 502, 503, and 1111(a) of the Bankruptcy Code, Rules 2002(a)(7), 3003(c)(3), and 5005(a) of the Bankruptcy Rules and Rule 9013-1 of the Local Rules.

INTRODUCTION

3. On August 10, 2026 (the “Petition Date”), the Debtors each filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code with the United States Bankruptcy Court for the Northern District of Ohio (the “Court”), commencing these chapter 11 cases (the “Chapter 11 Cases”).

4. The Debtors have remained in possession of their property and continue in the operation and management of their businesses as debtors-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

5. On August 14, 2026, the Court entered an order jointly administering the Chapter 11 Cases.

6. No official committee of unsecured creditors has been appointed in these Chapter 11 Cases by the Office of the United States Trustee (the “U.S. Trustee”) for the Northern District of Ohio.

7. Simultaneously with the filing of their petitions, the Debtors filed the Declaration of Sister Nancy Linenkugel, OSF, DM (the “Linenkugel Declaration”) and the Declaration of John T. Hillyer, chief restructuring officer, in support of the Debtors’ first day motions (the “Hillyer Declaration”).

BACKGROUND

8. The University is an Ohio nonprofit corporation that 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.

9. 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 have aged and their community has diminished in number, this financial burden has become untenable.

10. The University is in the process of closing, and its insolvency cannot be mitigated or addressed other than through bankruptcy proceedings. A full background of the events leading up to the filing of these Chapter 11 Cases is set forth in the Linenkugel Declaration, the contents of which are incorporated herein by reference.

RELIEF REQUESTED

11. By this Motion, the Debtors request entry of the Bar Date Order fixing a bar date and establishing procedures for the filing of pre-Petition Date proofs of claim (each a “Proof of Claim” and, collectively, “Proofs of Claim”) against the Debtors, and designating the form and manner of notice thereof.

12. The time for the Debtors to file their schedules of assets, liabilities, executory contracts, and unexpired leases (the “Schedules”) was extended by the Court to October 8, 2026. The Debtors intend to file the Schedules on or before that date. Pursuant to Bankruptcy Rule 3003(b)(1), the Schedules filed by the Debtors will constitute *prima facie* evidence of the validity of the claims of creditors listed therein, unless they are scheduled as “disputed,” “contingent” or “unliquidated.” Any creditor whose claim is not scheduled, or is scheduled as “disputed,” “contingent,” or “unliquidated,” must file a Proof of Claim, pursuant to Bankruptcy

Rule 3003(c)(2). Any and all creditors who fail to do so shall not be treated as a creditor for purposes of voting and distribution in these Chapter 11 Cases, as provided by Bankruptcy Rule 3003(c)(2).

13. Bankruptcy Rule 3003(c)(3) provides that the Court shall fix the time within which Proofs of Claim may be filed. To identify and resolve claims expeditiously, the Debtors request that the Court fix a deadline for filing Proofs of Claim of **December 18, 2026 at 5:00 p.m. (Prevailing Eastern Time)** (the “General Bar Date”). The Debtors request that all creditors be required to file a Proof of Claim on account of any Claim (as defined in 11 U.S.C. § 101(5)) against the Debtors, except as provided below. Notwithstanding any other provision of the Bar Date Order, governmental units will have until February 6, 2027 (the “Governmental Bar Date”), the date that is one hundred eighty (180) days after the Petition Date, to file Proofs of Claim.

14. The Debtors further request that any person or entity that holds a Claim arising from the rejection of an unexpired lease or executory contract, as to which the order authorizing such rejection is dated on or before the date of entry of the Bar Date Order, be required to file a Proof of Claim based on such rejection on or before the later of the Bar Date or the date that is thirty (30) days after the date of the order authorizing such rejection, and any person or entity that holds a Claim arising from the rejection of an unexpired lease or executory contract, as to which an order authorizing such rejection is dated after the date of entry of the Bar Date Order, be required to file a Proof of Claim on or before such date as the Court may fix in the applicable order authorizing such rejection (each, a “Rejection Bar Date”).

15. Finally, after the Schedules are filed, the Debtors retain the right to amend or supplement the Schedules. In that case, the Debtors shall give notice of any amendment or supplement to the holders of claims affected thereby, and holders of such claims shall have thirty

(30) days from the date of service of the notice to file Proofs of Claim (the “Amended Schedules Bar Date”) and shall be given notice of that deadline. The General Bar Date, Governmental Bar Date, Rejection Bar Date and Amended Schedules Bar Date are collectively referred to as the “Bar Date”).

16. The Debtors propose that the following procedures govern the filing of Proofs of Claim:

- (a) Proofs of Claim shall conform substantially to Official Bankruptcy Form No. 410;
- (b) Proofs of Claim shall be filed electronically via CM/ECF or by mailing or delivering the original Proof of Claim to the following address:

Clerk of the Court
United States Bankruptcy Court
Northern District of Ohio
405 Madison Avenue
Toledo, Ohio 43604;

- (c) Proofs of Claim shall be deemed filed only when received by the Clerk of the Court on or before the applicable Bar Date;
- (d) Proofs of Claim shall (i) be signed; (ii) specifically identify which of the Debtors the claim is against; (iii) include supporting documentation (if voluminous, attach a summary); (iv) be in the English language; and (v) be denominated in United States currency.

17. The Debtors request that, at this time, Proofs of Claim not be required to be filed by creditors wishing to assert Claims against the Debtors of the types that are set forth below (the “Excluded Claims”):

- (a) Any person or entity that has already filed a Proof of Claim against the Debtors in these cases in a form substantially similar to Official Bankruptcy Form No. 410;
- (b) Any person or entity whose Claim is listed on the Schedules if (i) the Claim is not scheduled as “disputed,” “contingent,” or “unliquidated”; and (ii) the claimant agrees with the amount, nature and priority of the Claim as set forth in the Schedules;
- (c) Any holder of a Claim that has already been allowed in these cases by order of the

Court;

- (d) Any holder of a Claim which has been paid in full by the Debtors;
- (e) Any holder of a Claim for which a different deadline for filing a Proof of Claim in these cases has already been fixed by this Court;
- (f) Any holder of a Claim allowable under sections 503(b) and 507(a)(2) of the Bankruptcy Code as an expense of administration of the Debtors' estates; or
- (g) Any person or entity with a Claim limited to the repayment of principal, interest, applicable fees, premium, if any, costs and/or other charges (a "Debt Claim") on or under any bond or related obligation issued by or for the benefit of the Debtors pursuant to an indenture, related instrument or agreement ("Debt Instruments"); provided however that (i) the foregoing exclusion shall not apply to any indenture trustee, or master trustee under applicable Debt Instruments ("Indenture Trustees") or sole holder of the Debt Claim ("Sole Holder"); (ii) Indenture Trustees or Sole Holder shall file such proofs of claim as they shall deem necessary and appropriate in their respective sole discretion on or before the Bar Date with respect to any Debt Claims under Debt Instruments; and (iii) any holder of a Debt Claim wishing to assert a claim other than a Debt Claim shall be required to file a proof of claim on or before the Bar Date, unless another exception in this paragraph applies. In addition, with respect to claims filed by any Indenture Trustee or Sole Holder, such claimants need not attach copies of the documents evidencing and/or securing the claims.

18. The Debtors propose that, pursuant to Bankruptcy Rule 3003(c)(2), a holder of a Claim that fails to comply with the Bar Date Order by timely filing a Proof of Claim in the appropriate form not be treated as a creditor with respect to that Claim for purposes of voting and distribution.

19. The Debtors intend to serve notice of the Bar Date, in substantially the same form annexed to the Bar Date Order as **Exhibit 1** (the "Bar Date Notice") together with an Official Proof of Claim form and instructions, by first class mail within five (5) business days of entry of the Bar Order on:

- (a) the Office of the United States Trustee for the Northern District of Ohio;
- (b) counsel to any official committee appointed in these cases;
- (c) all persons or entities that have requested notice of the proceedings in these

Chapter 11 Cases;

- (d) all persons or entities who have filed Claims in these Chapter 11 Cases;
- (e) all creditors and other known holders of Claims as of the date of the Bar Date Order, including all persons or entities listed in the Schedules as holding Claims;
- (f) all parties to executory contracts and unexpired leases of the Debtors;
- (g) all parties to litigation with the Debtors;
- (h) counsel for Signature Bank;
- (i) counsel for the Bond Trustee;
- (j) counsel for the DIP Lender;
- (k) the Internal Revenue Service;
- (l) the Ohio Attorney General's Office;
- (m) the U.S. Attorney for the Northern District of Ohio;
- (n) the U.S. Department of Education; and
- (o) any other parties requesting notices in these cases.

20. The Debtors propose that all entities asserting Claims against more than one Debtor be required to file a separate Proof of Claim with respect to each such Debtor and shall identify on each Proof of Claim form the particular Debtor against which a Claim is asserted. If more than one Debtor is listed on a single Proof of Claim form, then such Claim shall be treated as filed against the first listed Debtor.

21. The Debtors submit that service of the Bar Date Notice, as set forth above, is adequate and sufficient notice pursuant to section 102 of the Bankruptcy Code and Bankruptcy Rules 2002 and 9007, and that the entry of the annexed Bar Date Order is in the best interests of the Debtors, their estates, and their creditors.

RESERVATION OF RIGHTS

22. Nothing contained herein is intended or should be construed as an admission as to

the validity of any claim against the Debtors or a waiver of the Debtors' rights to dispute any claim on any grounds, including, but not limited to, the passing of the applicable statute of limitations. The Debtors reserve their right to dispute, or to assert offsets or defenses to, any claim (whether or not reflected on the Schedules or any amendments thereto) as to amount, liability, classification or otherwise, and to subsequently designate any claim as contingent, unliquidated or disputed. Nothing set forth herein is intended or should be construed as a waiver by the Debtors of any rights under any applicable State or Federal law.

NO PRIOR REQUEST

23. No prior request for the relief sought herein has been made to this or any other Court.

WHEREFORE, the Debtor respectfully requests that the Court enter the annexed Order fixing a Bar Date, establishing procedures for filing Proofs of Claim and directing notice thereof and grant such other and further relief as the Court may deem just and proper.

Dated: Uniondale, New York
September 18, 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)

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bpollack@cullenllp.com

(516) 357-3700

*Attorneys for Lourdes University and Lourdes Properties,
LLC*

NOTICE PURSUANT TO LOCAL RULE

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this case. If you do not have an attorney, you may wish to consult one. Under Local Bankruptcy Rule 9013-1 and 4:08, unless a written response to the Motion are filed with the Clerk of the Court and served on the moving party and the Office of the U.S. Trustee, objecting to the relief requested within twenty one (21) days, the Court may deem the opposition waived, treat the motions as conceded, and issue an order granting the requested relief without further notice of hearing.

/s/ Bonnie L. Pollack
Bonnie L. Pollack, Esq.

CERTIFICATE OF SERVICE

I, Bonnie L. Pollack, do hereby certify that a copy of this Motion was mailed or electronically sent to the following attached list of interested parties and creditors this 18th day of September, 2026.

Service List:

Notice will be electronically mailed to:

Patricia B. Fugee, on behalf of The Sisters of St. Francis of Sylvania Ohio., at patricia.fugee@fisherbroyles.com

Robert Lapowsky, on behalf of The Sisters of St. Francis of Sylvania Ohio at robert.lapowsky@stevenslee.com; r.edward.stone.iii@stevenslee.com

Lauren Schoenewald, Esq., on behalf of Office of the U.S. Trustee, at Lauren.schoenewald@usdoj.gov; USTP.Region09@usdoj.gov

Justin W. Ristau, on behalf of, Toledo-Lucas County Port Authority, at jristau@bricker.com; CKalvas@bricker.com

Henry J. Geha III of Marshall & Melhorn, LLC, on behalf of Lourdes University and Lourdes Properties LLC at geha@marshall-melhorn.com

Michael P. Shuster, of Porter Wright Morris & Arthur LLP on behalf of Signature Bank, N.A, at mshuster@porterwright.com

Jared S. Roach of REED SMITH LLP, on behalf of The Bank of New York Mellon Trust Company, N.A., at jroach@reedsmith.com, bankruptcy-2628@ecf.pacerpro.com

Scott A. Ciolek, on behalf of Dynamic Campus Solutions, Inc., at info@counselor.pro,
19977@notices.nextchapterbk.com

Justin Winerman, of Bryan Cave Leighton Paisner LLP, on behalf of Dynamic Campus Solutions, Inc. at justin.winerman@bclplaw.com

Katherine E. Spewak, of Bryan Cave Leighton Paisner LLP, on behalf of Dynamic Campus Solutions, Inc. at katie.spewak@bclplaw.com

John J. Rutter of Roetzel & Andress, LPA, on behalf of The Toledo Hospital dba Flower Hospital, at jrutter@ralaw.com

Hannah Ackley of Padgett Law Group on behalf of NewRez LLC, at
Hannah.Ackley@padgettlawgroup.com

Alexandra Bolder, on behalf of Department of Education, at Alexandra.Bolden@ed.gov

IRS Insolvency, at sbse.cio.bnc.mail@irs.gov

Ohio Attorney General, Bankruptcy Unit, at
OHAGCEBKYEBN@ohioattorneygeneral.gov

Pension Benefit Guaranty Corporation, at bncnotifications@pbgc.gov

Social Security Administration, Office of the General Counsel, at
ssa.bankruptcy@ssa.gov

Heather Balzano, on behalf of Aetna Life Insurance Company, at BalzanoH@aetna.com

Ask Legal, on behalf of Anthology, at Ask.Legal@ellucian.com

Joe Jacobs, on behalf of AVI Foodsystems Inc, at Jjacobs@AVIFoodsystems.com

Burton Rogers, on behalf of Bon Secours Mercy Health Inc, at Blrogers@mercy.com

Jessica Lewis Jin, on behalf of Charles E. Schell Foundation Grant, at
Jessica.Jin@53.com

Olivia Adamic, on behalf of Christian Brothers Employee Benefit Trust, at
olivia.adamic@cbservices.org

Timothy P Coyle, on behalf of Dept. of Health & Human Services, at tcogle@hrsa.gov

Mike Tumminello, on behalf of Dynamic Campus Solutions Inc, at Mike.Tumminello@dynamicccampus.com

Jeremy Marks, on behalf of Federal Work Study, at Jeremy.Marks@education.ohio.gov

Jeremy Marks, on behalf of SEOG (23300-12010), at Jeremy.Marks@education.ohio.gov

Kevin Mullan, on behalf of Kevin P. Mullan Consulting, LLC, at Kevin@kevinpmullan.com

Clay Nixon, on behalf of Niche.com, Inc., at clay.nixon@niche.com

Brittney Perry, on behalf of Paramount Health Care, at Brittney.Perry@medmutual.com

Charlie Anastasi, on behalf of Rize Education, Inc, at canastasi@rize.education

Nancy Feltz, on behalf of Signature Bank, N.A., at NFeltz@signaturebankna.com

Zachary Phillips, on behalf of The Ohio Department of Higher Edu., at Zachary.Phillips@utoledo.edu; Mchavanne@highered.ohio.gov

Brittany Hoyer, on behalf of Underground Systems Corp., at Underground1976@aol.com

Nicole Robbins, on behalf of City of Sylvania, at Nrobbins@cityofsylvania.com

Chris Ralston, on behalf of TeqLease, at chris.ralston@firstcitizens.com

Steven Guarino, on behalf of TeqLease, at steven.guarino@firstcitizens.com

Christopher Sonnenburg, on behalf of TeqLease, at christopher.sonnenburg@firstcitizens.com

Terry Goodall, on behalf of Glass Masters 2000 LLC, at GlassMasters2000@gmail.com

Hassan Bataineh, at hassanbatayneh10@gmail.com

Laurie Murdock, on behalf of HD Supply Facilities Maintenance, Ltd., at Laurie.Murdock@HDSupply.com

John Gould, on behalf of Hoffman and Harpst Co Inc, at info@hoffmanandharpst.com

Karen Boecker, on behalf of Roto-Rooter, at service@toledorotorooter.com

Toledo Edison Corporation, at TE_interconnection@firstenergycorp.com

KC Baker, on behalf of, Signature Bank, N.A. at kcbaker914@gmail.com

Hylant Insurance Agency at Legal@Hylant.com

Notice will be mailed to:

Attorney General of the United States
Main Justice Building
10th & Constitution Avenue, N.W.
Washington, D.C. 20530

Office of the United States Attorney
Suite 308, Four Seagate, Third Floor
Toledo, Ohio 43604

Internal Revenue Service
P.O. Box 7346
Philadelphia, Pennsylvania 19101-7346

U.S. Department of Education
Direct Loan Servicing Center
P.O. Box 5609
Greenville, Texas 75403-5609

Environmental Protection Agency
Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

Defense Finance and Accounting Services - Cleveland
Attention: DFAS-HGA/CL
P.O. Box 998002
Cleveland Ohio 44199-8002

Momentum Telecom
1200 Corporate Drive
Ste 300
Birmingham AL 35242

Time Warner/Spectrum
Charter Communications
PO Box 223085
Pittsburgh, PA 15251-2085

Columbia Gas
P O Box 4629
Carol Stream, IL 60197

Buckeye Broadband
P O BOX 10027
Toledo, OH 43699

Republic Services
6749 Dixie Highway
Erie, MI 48133-922323

Verizon Wireless
PO Box 16810
Newark, NJ 07101

Christian Brothers
1205 Windham Parkway
Romeoville, IL 60446

EXHIBIT A
PROPOSED BAR DATE ORDER

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

IN RE:	)	Case No. 26-31894
	)	
LOURDES UNIVERSITY and	)	CHAPTER 11
LOURDES PROPERTIES, LLC, ¹ ,	)	
Jointly Administered Debtors-in-Possession	)	Judge Mary Ann Whipple

**ORDER ESTABLISHING DEADLINE FOR FILING PROOFS OF CLAIM
AND APPROVING THE FORM AND MANNER OF NOTICE THEREOF**

Upon the motion (the “Motion”)² filed by Lourdes University and Lourdes Properties, LLC, the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), for entry of an order, pursuant to Rule 3003(c)(3) of the Federal Rules of Bankruptcy Procedure (the

¹ The Debtors in these chapter 11 cases along with the last four digits of each Debtor’s federal tax identification number are: Lourdes University (6547); and Lourdes Properties, LLC (8998). The location of the Debtors’ principal place of business is 6832 Convent Blvd., Sylvania, Ohio 43560.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

“Bankruptcy Rules”) fixing a deadline and establishing procedures for filing proofs of claim and approving the form and manner of service thereof, and it appearing that the relief requested is in the best interests of the Debtors, their estates, and their creditors and that adequate notice has been given and that no further notice is necessary; and after due deliberation and good and sufficient cause appearing therefor, it is hereby

ORDERED, that except as otherwise provided herein, all persons and entities, (including, without limitation, individuals, partnerships, corporations, joint ventures, trusts and governmental units) that assert a claim, as defined in section 101(5) of title 11 of the United States Code, 11 U.S.C. § 101 et seq. (the “Bankruptcy Code”), against either of the Debtors which arose prior to the filing of the Debtors’ chapter 11 petitions on August 10, 2026 (the “Petition Date”), shall file a proof of such claim in writing so that it is received on or before **December 18, 2026 at 5:00 p.m. (Prevailing Eastern Time)** (the “General Bar Date”); and it is further

ORDERED, that notwithstanding any other provision hereof, Proofs of Claim filed by governmental units must be filed on or before February 6, 2027 (the “Governmental Bar Date”) (the date that is one hundred eighty (180) days after the Petition Date); and it is further

ORDERED, that any person or entity that holds a Claim that arises from the rejection of an executory contract or unexpired lease, as to which the order authorizing such rejection is dated on or before the date of entry of this Order, must file a Proof of Claim based on such rejection on or before the later of the Bar Date or the date that is thirty (30) days after the date of the order authorizing such rejection, and any person or entity that holds a Claim that arises from the rejection of an executory contract or unexpired lease, as to which an order authorizing such rejection is dated after the date of entry of this Order, must file a Proof of Claim on or before

such date as the Court may fix in the applicable order authorizing such rejection (each, a “Rejection Bar Date”); and it is further

ORDERED, that if the Debtors amend or supplement the Schedules after they are filed, the Debtors shall give notice of any amendment or supplement to the holders of Claims affected thereby, and holders of such claims shall have thirty (30) days from the date of service of the notice to file Proofs of Claim (the “Amended Schedules Bar Date”) and shall be given notice of such deadline; and it is further

ORDERED, that the following procedures for the filing of Proofs of Claim shall apply:

- (a) Proofs of Claim shall conform substantially to Official Bankruptcy Form No. 410;
- (b) Proofs of Claim shall be filed electronically via CM/ECF or by mailing or delivering the original Proof of Claim to the following address:

Clerk of the Court
United States Bankruptcy Court
Northern District of Ohio
405 Madison Avenue
Toledo, Ohio 43604;

- (c) Proofs of Claim shall be deemed filed only when received by the Clerk of the Court on or before the applicable Bar Date; and
- (d) Proofs of Claim shall (i) be signed; (ii) shall designate which Debtor the claim is against; (iii) include supporting documentation (if voluminous, attach a summary); (iv) be in the English language; and (v) be denominated in United States currency.

ORDERED, that the following persons or entities need not file a Proof of Claim on or prior to the Bar Date:

- (a) Any person or entity that has already filed a Proof of Claim against the Debtors in these cases in a form substantially similar to Official Bankruptcy Form No. 410;
- (b) Any person or entity whose Claim is listed on the Schedules if (i) the Claim is not scheduled as “disputed,” “contingent,” or “unliquidated”; and (ii) the claimant agrees with the amount, nature and priority of the Claim as set forth in the Schedules;

- (c) Any holder of a Claim that has already been allowed in these cases by order of the Court;
- (d) Any holder of a Claim which has been paid in full by the Debtors;
- (e) Any holder of a Claim for which a different deadline for filing a Proof of Claim in these cases has already been fixed by this Court;
- (f) Any holder of a Claim allowable under sections 503(b) and 507(a)(2) of the Bankruptcy Code as an expense of administration of the Debtors' estates; or
- (g) Any person or entity with a Claim limited to the repayment of principal, interest, applicable fees, premium, if any, costs and/or other charges (a "Debt Claim") on or under any bond or related obligation issued by or for the benefit of the Debtors pursuant to an indenture, related instrument or agreement ("Debt Instruments"); provided however that (i) the foregoing exclusion shall not apply to any indenture trustee, or master trustee under applicable Debt Instruments ("Indenture Trustees") or sole holder of the Debt Claim ("Sole Holder"); (ii) Indenture Trustees or Sole Holder shall file such proofs of claim as they shall deem necessary and appropriate in their respective sole discretion on or before the Bar Date with respect to any Debt Claims on or under Debt Instruments; and (iii) any holder of a Debt Claim wishing to assert a claim other than a Debt Claim shall be required to file a proof of claim on or before the Bar Date, unless another exception in this paragraph applies. In addition, with respect to claims filed by any Indenture Trustee or Sole Holder, such claimants need not attach copies of the documents evidencing and/or securing the claims.

ORDERED, that nothing in this Order shall prejudice the right of the Debtors or any other party in interest to dispute or assert offsets against or defenses to any Claim reflected in the Schedules; and it is further

ORDERED, that pursuant to Bankruptcy Rule 3003(c)(2), a holder of a Claim that fails to comply with this Order by timely filing a Proof of Claim in appropriate form shall not be treated as a creditor with respect to such Claim for the purposes of voting and distribution in these Chapter 11 Cases; and it is further

ORDERED, that any person or entity who desires to rely on the Schedules will have the responsibility for determining that the claim is accurately listed in the Schedules; and it is further

ORDERED, that notice of the Bar Date substantially in the form annexed hereto as **Exhibit 1** is approved and shall be deemed adequate and sufficient if served, together with the Official Proof of Claim form and instructions, within five (5) business days of entry of this Order on:

- (a) the Office of the United States Trustee for the Northern District of Ohio;
- (b) counsel to any official committee appointed in these cases;
- (c) all persons or entities that have requested notice of the proceedings in these Chapter 11 Cases;
- (d) all persons or entities who have filed Claims in these Chapter 11 Cases;
- (e) all creditors and other known holders of Claims as of the date of the Bar Date Order, including all persons or entities listed in the Schedules as holding Claims;
- (f) all parties to executory contracts and unexpired leases of the Debtors;
- (g) all parties to litigation with the Debtors;
- (h) counsel for Signature Bank;
- (i) counsel for the Bond Trustee;
- (j) counsel for the DIP Lender;
- (k) the Internal Revenue Service;
- (l) the Ohio Attorney General's Office;
- (m) the U.S. Attorney for the Northern District of Ohio;
- (n) the U.S. Department of Education; and
- (o) any other parties requesting notices in these cases.

and it is further

ORDERED, that all entities asserting Claims against more than one Debtor shall file a separate Proof of Claim with respect to each such Debtor and shall identify on each Proof of Claim form the particular Debtor against which a Claim is asserted. If more than one Debtor is

listed on a single Proof of Claim form, then such Claim shall be treated as filed against the first listed Debtor; and it is further

ORDERED, that the Debtors are authorized and empowered to take such steps and perform such acts as may be necessary to implement and effectuate the terms of this Order; and it is further

ORDERED, that entry of this Order is without prejudice to the right of the Debtors to seek a further order of this Court fixing a date by which holders of Claims not subject to the Bar Date established herein must file such Proofs of Claim or be barred from doing so; and it is further

ORDERED, that this Court shall retain jurisdiction over any matter arising from or related to the implementation of this Order.

EXHIBIT 1

BAR DATE NOTICE

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

IN RE:	)	Case No. 26-31894
	)	
LOURDES UNIVERSITY and	)	CHAPTER 11
LOURDES PROPERTIES, LLC, ¹ ,	)	
Jointly Administered Debtors-in-Possession	)	Judge Mary Ann Whipple

**NOTICE OF DEADLINE REQUIRING FILING OF PROOFS OF CLAIM
ON OR BEFORE DECEMBER 18, 2026 AT 5:00 P.M. (PREVAILING EASTERN TIME)**

PLEASE TAKE NOTICE that, on _____, 2026 (the “Order Date”), the United States Bankruptcy Court for the Northern District of Ohio, at Toledo, Ohio, entered an order in the above-captioned Chapter 11 cases (the “Bar Date Order”) requiring that all persons and entities (as such terms are defined in the Bankruptcy Code) including, without limitation, individuals, partnerships, corporations, estates, trusts and governmental units, EXCEPT THOSE PERSONS AND ENTITIES DESCRIBED BELOW, who have, assert, or may have or assert, any claim (as defined herein) against Lourdes University and Lourdes Properties, LLC (collectively, the “Debtors”),¹ the debtors and debtors-in-possession in the above-captioned Chapter 11 cases (the “Chapter 11 Cases”), in accordance with the following Bar Dates:

- (a) any holder of a claim against the Debtors, except those persons or entities described below**, must file their Proofs of Claim against the Debtors on or before December 18, 2026 at 5:00 p.m. (prevailing eastern time) (the “General Bar Date”).
- (b) Governmental units** (as defined by section 101(27) of the Bankruptcy Code) who have, assert, or may have or assert any claim (as defined herein) against the Debtors, must file their Proofs of Claim against the Debtors on or before February 6, 2027 (the “Governmental Bar Date”).
- (c) any holder of a Claim** that arises from the rejection of an executory contract or unexpired lease, as to which the order authorizing such rejection is dated on or before the date of entry of the Bar Date Order, must file a Proof of Claim based on such rejection on or before the later of the General Bar Date or the date that is thirty (30) days after the date of the order authorizing such rejection, and any person or entity that holds a Claim that arises from the rejection of an executory contract or unexpired lease, as to which an order authorizing such rejection is dated after the date of entry of this Order, must file a Proof of Claim on or before such date as the Court may fix in the applicable order authorizing such rejection (each, a “Rejection Bar Date”).
- (d) holders of claims** based on the description and amount of such claim in schedules that

¹ The Debtors in these chapter 11 cases along with the last four digits of each Debtor’s federal tax identification number are: Lourdes University (6547); and Lourdes Properties, LLC (8998). The location of the Debtors’ principal place of business is 6832 Convent Blvd., Sylvania, Ohio 43560.

have been amended by the Debtor shall have thirty (30) days from the date of service of the notice of the amendment to file Proofs of Claim (the “Amended Schedules Bar Date”).

Filing Procedures

Pursuant to the Bar Date Order, all Proofs of Claim must be filed so as to be received by the Clerk of the Court before 5:00 p.m., prevailing Eastern Time, on the respective Bar Date. The official claims register at the office of the Clerk may be inspected during the Court’s ordinary business hours from 9:00 a.m. to 4:00 p.m., prevailing Eastern time. All Proofs of Claim must be filed so as to be received by the Clerk of the Court at the following address:

Clerk of the Court
United States Bankruptcy Court
Northern District of Ohio
405 Madison Avenue
Toledo, Ohio 43604

SUCH PROOFS OF CLAIM WILL BE DEEMED FILED ONLY WHEN ACTUALLY RECEIVED BY THE CLERK OF THE COURT. You must file an original of each proof of claim or file the original on the Court’s ECF system, <https://www.ohnb.uscourts.gov> (a PACER login and password are required). Proofs of claim submitted by facsimile or e-mail will not be accepted. Copies of the proofs of claim do not need to be served upon either the Debtors or counsel for Debtors.

Claims Covered by Bar Date

The Bar Date Order requires that, with the exceptions listed below, all persons and entities, including, without limitation, individuals, partnerships, corporations, estates and trusts, who have or assert, or may have or may assert, any Claim against the Debtors, including any Claim arising out of an executory contract or lease that has been rejected by the Debtors, must file proofs of claim on or before the respective Bar Date, unless such parties determine that the Debtors have properly scheduled such party’s claim, if any, against the Debtors’ estates. Each Bar Date applies generally to all creditors, including, without limitation, the following:

- (a) creditors whose claims arise from the provision of goods, services, and/or utilities to Debtors;
- (b) creditors whose claims arise out of the rejection of executory contracts and unexpired leases prior to the entry of the Bar Date Order; and
- (c) governmental units (as such term is defined in section 101(27) of the Bankruptcy Code) holding claims of any nature for unpaid taxes, whether arising out of prepetition tax years or periods or prepetition transactions to which Debtors were a party.

For purposes of this Notice, “Claim” shall have the meaning set forth in section 101(5) of the Bankruptcy Code, including (a) any right to payment, whether or not such right is reduced to

judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured or unsecured or (b) any right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured or unsecured.

The Debtors will be filing their schedules of assets and liabilities (collectively, the “Schedules”) with the Bankruptcy Court on or before the deadline for doing so pursuant to Order of the Court, October 8, 2026. The Schedules are available for review at the Clerk’s office and on the Court’s Internet Website at <https://www.ohnb.uscourts.gov> (a PACER login and password are required). Pursuant to section 1111(a) of the Bankruptcy Code, a proof of claim is deemed filed for any Claim that is listed in the Schedules, except a Claim that is scheduled as disputed, contingent, or unliquidated.

ALL PERSONS WHO, OR ENTITIES WHICH, ARE REQUIRED TO FILE A PROOF OF CLAIM ON OR BEFORE THE CLAIMS BAR DATE (OR SUCH OTHER DATE AS MAY BE PROVIDED HEREIN), AND FAIL TO DO SO IN THE MANNER PRESCRIBED ON OR BEFORE THE RESPECTIVE BAR DATE ARE (A) FOREVER BARRED, ESTOPPED AND ENJOINED FROM ASSERTING ANY CLAIMS THAT SUCH PERSONS OR ENTITIES POSSESS AGAINST THE DEBTORS, (B) ARE BARRED FROM RECEIVING ANY DISTRIBUTION FROM THE DEBTORS’ ESTATES AND (C) ARE BARRED FROM VOTING ON ANY PROPOSED PLAN OF LIQUIDATION; *provided, however,* that such persons or entities need not file a proof of claim if such Claim has been paid on or before the Claims Bar Date pursuant to any order of the Court.

Claims Not Covered By Bar Date

The Claims Bar Date shall apply to each and every prepetition Claim asserted by a creditor of Debtors, except for:

- (a) a claim asserted by any person who, or entity that, has already properly filed with this Court a Proof of Claim against Debtors;
- (b) a claim asserted by any person or entity (i) whose claim against Debtors is not listed as “disputed,” “contingent” or “unliquidated” in the Schedules and (ii) who does not object to the classification and amount set forth therein;
- (c) a claim asserted by any person or entity whose claim against Debtors has previously been allowed by order of this Court;
- (d) a claim for which this Court has authorized payment and for which payment has been made;
- (e) the postpetition claims of the United States Trustee’s Office or Bankruptcy Court for the Northern District of Ohio for fees payable under 28 U.S.C. § 1930;
- (f) any holder of a Claim allowable under sections 503(b) and 507(a)(2) of the Bankruptcy Code as an expense of administration of the Debtors’ estates; or
- (g) any person or entity with a Claim limited to the repayment of principal, interest,

applicable fees, premium, if any, costs and/or other charges (a “Debt Claim”) on or under any bond or related obligation issued by or for the benefit of the Debtors pursuant to an indenture, related instrument or agreement (“Debt Instruments”); provided however that (i) the foregoing exclusion shall not apply to any indenture trustee, or master trustee under applicable Debt Instruments (“Indenture Trustees”) or sole holder of the debt claim (“Sole Holder”); (ii) Indenture Trustees or Sole Holder shall file such proofs of claim as they shall deem necessary and appropriate in their respective sole discretion on or before the Claims Bar Date with respect to any Debt Claims on or under Debt Instruments; and (iii) any holder of a Debt Claim wishing to assert a claim other than a Debt Claim shall be required to file a proof of claim on or before the Claims Bar Date, unless another exception in this paragraph applies. In addition, with respect to claims filed by any Indenture Trustee or Sole Holder, such claimants need not attach copies of the documents evidencing and/or securing the claims.

Any person or entity whose Claim (a) is not listed or properly classified in the Schedules, (b) is listed in an incorrect amount or (c) is listed as disputed, contingent, or unliquidated and who desires to participate in these Chapter 11 Cases or share in any distribution in these Chapter 11 Cases must file a proof of claim on or before the Bar Date. **IF IT IS UNCLEAR FROM THE SCHEDULES WHETHER YOUR CLAIM IS DISPUTED, CONTINGENT, OR UNLIQUIDATED AS TO AMOUNT OR OTHERWISE PROPERLY LISTED AND CLASSIFIED, YOU MUST FILE A PROOF OF CLAIM ON OR BEFORE THE BAR DATE.** Any person or entity who desires to rely on the Schedules will have the responsibility for determining that its claim is accurately listed therein.

Debtors have reserved the right (a) to dispute, or to assert offsets or defenses against, any claim listed or reflected on the Schedules as to amount, liability, classification or otherwise, (b) to subsequently designate any claim as disputed, contingent, or unliquidated or (c) to object to any claim listed or reflected on the Schedules; provided, however, that if Debtors amend the Schedules to designate a claim as disputed, contingent, or unliquidated, or to change the amount or classification of a claim reflected therein, then the affected creditor shall be granted thirty (30) days from the date of mailing of notice to such creditor in which to file a proof of claim. Nothing set forth herein shall preclude Debtors from objecting to any claim, whether scheduled or filed, on any grounds.

Filing Proofs of Claim Against Multiple Debtors

All persons and entities asserting Claims against more than one Debtor shall file a separate Proof of Claim with respect to each such Debtor and shall identify on each Proof of Claim Form the particular Debtor against which a Claim is asserted. If more than one Debtor is listed on the Proof of Claim Form, then the Debtors will treat such Claim as filed against the first listed Debtor.

This Notice is being sent to many persons and entities that have had some relationship with, or have done business with, the Debtors, but may not have an unpaid claim against the Debtors. The fact that you have received this Notice does not mean that you have a claim or that the Debtors or the Court believes that you have a claim against the Debtors.

_____, 2026

BY ORDER OF THE COURT