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

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MOTION PURSUANT TO FED. R. BANKR. P. 9006(c) FOR ORDER SHORTENING NOTICE WITH RESPECT TO MOTION FOR ENTRY OF AN ORDER AUTHORIZING THE DEBTOR TO TRANSFER OPERATIONS AND GRANTS RELATED TO THE LIFELONG LEARNING AND THE UPWARD BOUND PROGRAMS

Lourdes University, one of the above-captioned jointly administered debtors and debtors-in-possession (the "Debtor"), by and through its proposed attorneys Cullen and Dykman LLP, respectfully requests (the "Motion to Shorten") entry of an order shortening the notice period with respect to the relief requested in their *Motion Of The Debtor For Entry of an Order Authorizing Debtor to Transfer Intellectual Property and/or Grants Related to the Lifelong Learning and The Upward Bound Programs* (the "Motion") (Doc. No. __).

The Debtor requests that the Court set a hearing to consider the Motion for September 2, 2026 at 9:30 a.m., as a hearing in this case is already scheduled to take place at that time, and the programs to which this relates begin on or a day before that date. A proposed form of order granting the relief requested herein is annexed hereto as Exhibit A.

BACKGROUND

1. On August 10, 2026 (the "Petition Date"), The Debtor together with a related debtor filed voluntary petitions for relief pursuant to chapter 11 of the Bankruptcy Code.

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[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.

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2. The Debtor remains in possession of its property and continue in the operation and management of its business as a debtor-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

3. The Court issues an order granting joint administration of the two cases was filed on the Petition Date.

4. No official committee of unsecured creditors has been appointed by the Office of the United States Trustee for the Northern District of Ohio in these chapter 11 cases.

5. Details regarding the Debtors and their operations are set forth in the Declaration of Sr. Nancy Linenkugel in Support of Filing [Dkt. No. 4] (the "First Day Decl.") and incorporated herein.

JURISDICTION

6. This Court has jurisdiction over this matter pursuant to 28 U.S.C. §§157 and 1334. Venue of the Debtors' cases in this District is proper pursuant to 28 U.S.C. §§1408 and 1409. This matter is a core proceeding under 28 U.S.C. §157(b)(2).

7. The statutory predicate for the relief sought herein is Rule 9006 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules").

RELIEF REQUESTED AND BASIS THEREFOR

8. By this Motion, the Debtor respectfully requests that the Court shorten the notice period with respect to the Motion.

9. Bankruptcy Rule 9006(c) provides that "when an act is required or allowed to be done at or within a specified time by these rules or by a notice given thereunder or by order of court, the court for cause shown may in its discretion with or without motion or notice order the period reduced." Fed. R. Bankr. P. 9006(c). The Debtor believes that sufficient cause exists to

shorten the notice period for a hearing on the Motion given the time constraints that the Debtor is under with respect to the programs that are the subject of the Motion.

10. As set forth in detail in the Motion[2], the University has run two programs that benefit the community: (i) the Lifelong Learning Program and (ii) the Upward Bound Program. The University terminated all of its educational programs as of August 7, 2026 and is unable to continue to offer either Program.

11. The Programs do not generate a profit. The Upward Bound Program is funded by a grant (the "DOE Grant") to the Debtor from the United States Department of Education (the "DOE") that covers the period September 1, 2022 through August 31, 2027. The DOE Grant funds are provided by the DOE to the Debtor based on an annual budget. The final DOE Grant period commences on September 1, 2026 (the "Upward Bound 2026-2027 Budget Period").

12. The Fall 2026 semester for both Programs continues to be promoted on the University website and prospective students have been registering.

13. In order to ensure continued operation of the Programs for the benefit of the prospective students and the community, and to further their mission of service to the community, SOSF has agreed to take over operation of the Programs and to assume liability for the Programs' expenses pursuant to the terms of the Agreement attached to the Motion as Exhibit A. To facilitate the transfer of the Programs and SOSF's assumption of their operations, and to maintain the continuity of the Programs, SOSF requires the right to use all intellectual property relating to both Programs (including all mailing lists and databases maintained by the University) (the "Program IP"), and the ability to promote the Fall semester of both Programs on the University website. The Debtor does not believe that the Program IP has any value independent of the Programs.

[2] Capitalized terms used but not defined herein shall have the meanings ascribed in the Motion.

14. Time is of the essence to ensure continued compliance with the DOE Grant and that the Programs will continue to serve the students for the Fall 2026 semester. The Upward Bound program begins September 1, 2026 and the Lifelong Learning Program begins around the same date. SOSF is willing to immediately close the transaction, subject only to Court approval, so that the transfer of the Programs can be completed in time for the Fall 2026 semester.

NOTICE AND NO PRIOR REQUEST

15. Notice of this Motion to Shorten and the Motion has been provided to: (i) the U.S. Trustee; (ii) counsel to the Bond Trustee; (iii) counsel to Signature Bank; (iv) counsel to the DIP Lender; (v) the United States Department of Education; (vi) those entities or individuals listed on the Debtors' lists of 20 largest unsecured creditors; and (vii) any other party who has requested to receive notices in this case.. The Debtor submits that such notice is sufficient in view of the facts and circumstances herein and that no other or further notice need be provided.

16. No previous application for the relief sought herein has been made to this or any other Court.

WHEREFORE, the Debtor respectfully requests entry of an order granting the relief requested herein and such other and further relief as is just and appropriate.

Dated: Uniondale, New York
August 28, 2026

Respectfully submitted,

Cullen and Dykman LLP

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EXHIBIT A

Proposed Order

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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, [3],	)	
Jointly Administered Debtors-in-Possession	)	Judge Mary Ann Whipple

ORDER PURSUANT TO FED. R. BANKR. P. 9006(c) SHORTENING NOTICE WITH RESPECT TO MOTION FOR ENTRY OF AN ORDER AUTHORIZING THE DEBTOR TO TRANSFER OPERATIONS AND GRANTS RELATED TO THE LIFELONG LEARNING AND THE UPWARD BOUND PROGRAMS

Upon the Motion to Shorten [4] filed by Lourdes University, one of the above-captioned jointly administered debtors and debtors-in-possession (jointly, the "Debtor"), by and through the proposed attorneys Cullen and Dykman LLP, seeking entry of an order pursuant to Rule 9006(c) of the Federal Rules of Bankruptcy Procedure shortening the time for notice of the hearing to consider the *Motion of The Debtor For Entry of an Order Authorizing Debtor to Transfer Operations and Grants Related to the Lifelong Learning and the Upward Bound Programs*

[3] 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.
[4] Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to such terms in the Motion to Shorten.

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(the "Motion") (Doc. No. __), all as more fully set forth in the Motion to Shorten; and the Court having jurisdiction to decide the Motion to Shorten and the relief requested therein; and consideration of the Motion to Shorten 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 relief sought in the Motion to Shorten having been provided; 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 found and determined that the relief requested in the Motion to Shorten is reasonable and appropriate; 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 to Shorten is granted.

2. A hearing to consider the Motion will be held on **[September 2, 2026** at **9:30 a.m. (Eastern Time)]** (the "Hearing").

3. Any responses or objections to the Motion may be presented at the Hearing.

4. The Debtor is authorized to take all actions necessary to effectuate the relief granted in this Order.

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