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

MOTION PURSUANT TO FED. R. BANKR. P. 9006(c) FOR ORDER SHORTENING NOTICE AND EXPEDITING HEARING WITH RESPECT TO MOTION OF DEBTOR PURSUANT TO 11 U.S.C. §§ 105(A), 521, FEDERAL RULE OF BANKRUPTCY PROCEDURE 1007, 1008, 1009, 9013, AND LOCAL BANKRUPTCY RULE 1007-2 FOR ENTRY OF AN ORDER (I) AUTHORIZING THE CLERK TO REMOVE THE EXISTING CREDITOR MATRIX AND GRANTING LEAVE TO THE DEBTOR TO FILE A NEW MATRIX; OR IN THE ALTERNATIVE (II) AUTHORIZING THE DEBTOR TO AMEND THE CREDITOR MATRIX

Lourdes University, one of the above-captioned debtors and debtors-in-possession (the "**Debtor**"), by and through its attorneys Cullen and Dykman LLP, respectfully requests (the "**Motion to Shorten**") entry of an order shortening the notice period, limiting notice and expediting the hearing with respect to the Motion of Debtor (the "**Motion**")[2] pursuant to 11 U.S.C. §§ 105(a) and 521, Federal Rule of Bankruptcy Procedure 1007, 1008, 1009, 9013 ("**Bankruptcy Rules**"), and Local Bankruptcy Rule 1007-2 ("**Local Rules**") (a) authorizing the clerk of the court to remove the current creditor matrix (the "**Existing Matrix**"); (b) granting leave to the Debtor to file a new matrix; or in the alternative; (c) authorizing the Debtor to amend its Existing Matrix. .

The Debtor requests that the Court set a hearing to consider the Motion on **[October __**, 2026 at **__:__ _.m.]** (the "**Hearing**"), and that any responses or objections to the Motion may be

[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 defined herein shall have the meanings ascribed in the Motion.

presented at the Hearing. A proposed form of order granting the relief requested herein is annexed hereto as **Exhibit A**.

JURISDICTION

1. 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).

2. The statutory predicate for the relief sought herein is Bankruptcy Rule 9006.

BACKGROUND

3. On August 10, 2026 (the "**Petition Date**"), each of the Debtors filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "**Bankruptcy Code**") in this Court.

4. The Debtors remain in possession of their property and continue to manage and operate their businesses as debtors-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

5. On August 11, 2026, the Court entered an order authorizing the joint administration of the Debtors' cases.

6. No trustee, examiner, or official committee of unsecured creditors has been appointed in these chapter 11 cases, and no request for appointment of a trustee or examiner has been made.

7. Simultaneously with the filing of their petitions, the Debtors filed the Declaration of Sr. Nancy Linenkugel, OSF, DM, and, on August 12, 2026, filed the Declaration of John Hillyer (collectively, the "**First Day Declarations**"). The First Day Declarations set forth a

detailed factual background of the Debtors' businesses and operations and are incorporated herein by reference.

RELIEF REQUESTED AND BASIS THEREFOR

8. By this Motion to Shorten, the Debtor respectfully requests that the Court shorten the notice period, limit notice and expedite the hearing with respect to the Motion.

9. Bankruptcy Rule 9006(c)(1) provides that "[w]hen a rule, notice given under a rule, or court order requires or allows an act to be done within a specified time, the court may—for cause and with or without a motion or notice—reduce the time.

10. As set forth in the Motion, shortly after the filing of the Debtor's case, Debtor's Chief Restructuring Officer, Hillyer Group LLC ("**Hillyer"**), was asked to provide Debtor's counsel with a list of entities who were owed money by the Debtor or with whom the Debtor was transacting business. Mistakenly, Hillyer believed that such list should include any entity with whom the Debtor had transacted business, no matter how long ago. As a result, Hillyer prepared from the Debtor's database and books and records a creditor list that contained more than 3300 persons or entities.

11. Recently, as Hillyer was working with the Debtor's counsel to prepare the Schedules and Statement of Financial Affairs for each Debtor and in reviewing those creditors to be included in either the schedules of claims and contracts and leases, the miscommunication became apparent; the creditor list provided was vastly overstated. Approximately 3000 of those persons or entities have not transacted business with the Debtor in many years, and none of them were owed money by the Debtor. But for that miscommunication, the Subject Entities would never have been on any matrix in the case.

12. This has already led to an unnecessary drain on estate resources. There are several mailings which already went to the Subject Entities at considerable cost. Upon information and belief, all of the Subject Entities were sent notice of the filing of this case and notice of the Section 341 Meeting by the Court, as well as other notices, the cost of which is ultimately borne by the Debtor. In addition, pursuant to the Notice Procedure Order, the Debtor served the entirety of the Existing Matrix with notice of the Bar Date for filing claims. This required several days of time expended by multiple members of counsel's staff at significant cost.

13. Ordinarily, the Subject Entities would not have received any notices. Here, they actually received notice of the case filing, 341 meeting and bar date. They are already in a position to participate in this case if they believe they are entitled to. The harm to the estate by continuing to incur costs, at the expense of the actual creditors, is considerably greater than any prejudice that may arise if notice was not provide to the Subject Entities..

14. Because clerk's notices are sent to the Existing Matrix continually, time is of the essence. and the ordinary objection period under Bankruptcy Rule 2002 and Local Rule 9013-1, makes the requested shortened notice necessary.

NOTICE AND NO PRIOR REQUEST

15. Notice of this Motion to Shorten and the Motion has been provided to the parties on the Master Service List filed with the Court in accordance with the Order Limiting Notice dated August 14, 2026. The Debtor submits that, under the circumstances, no other or further notice is required.

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

WHEREFORE, the Debtor respectfully requests entry of an order shortening the notice period, limiting notice and expediting the hearing on the Motion, providing that any responses or objections may be presented at the Hearing, and granting such other and further relief as is just and appropriate.

Dated: Uniondale, New York
October 20, 2026

Respectfully submitted,

Cullen and Dykman LLP

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EXHIBIT A

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

ORDER PURSUANT TO FED. R. BANKR. P. 9006(c) SHORTENING NOTICE AND EXPEDITING HEARING WITH RESPECT TO MOTION (A) TO REMOVE AND REPLACE CREDITOR MATRIX OR, IN THE ALTERNATIVE, FOR LEAVE TO AMEND CREDITOR MATRIX; AND (B) TO AUTHORIZE LIMITED NOTICE FOR SERVICE MOTION

Upon the Motion to Shorten[4] filed by Lourdes University, one of the above-captioned debtors and debtors-in-possession (the "**Debtor**"), by and through its attorneys Cullen and Dykman LLP, seeking entry of an order pursuant to Rule 9006(c) of the Federal Rules of Bankruptcy Procedure shortening the notice period and expediting the hearing to consider the Debtor's Motion for an order (a) (i) authorizing the clerk of the court to remove the Debtor's Existing Matrix and (ii) authorizing the Debtor to file a new matrix in its place or, in the alternative, (b)

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

authorizing the Debtor to amend its Existing Matrix; and (c) authorizing limited notice of the Motion and the hearing thereon, 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)(2); 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 **[October __, 2026** at **__:__ _.m.]** (the "**Hearing**") ") in **Courtroom 1, United States Bankruptcy Court, 405 Madison** Avenue, Sixth Floor, Toledo, Ohio. Parties may participate in person OR by calling the **court's conference (419-718-0655, conference ID: 13919354#) no less than 5 minutes prior to the scheduled hearing.**

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

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