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

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

DEBTOR'S MOTION FOR ENTRY OF AN ORDER APPROVING COMPROMISE AND SETTLEMENT PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 9019 WITH RESPECT TO PRE-PETITION PAYMENT OF SEVERANCE

Lourdes University (the "**University**") and Lourdes Properties, LLC, the above-captioned debtors and debtors-in-possession (the "**Debtors**"), hereby submit this motion (the "**Motion**") for entry of an order, substantially in the form attached hereto as **Exhibit A**, approving a compromise and settlement pursuant to Rule 9019 of the Federal Rules of Bankruptcy Procedure (the "**Bankruptcy Rules**"), in connection with the pre-petition payment of severance to employees. In support of this Motion, the Debtors respectfully state as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction over this Motion 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 predicates for the relief sought herein is Bankruptcy Rule 9019.

[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.

INTRODUCTION

3. On August 10, 2026 (the "**Petition Date**"), the Debtors filed voluntary petitions for relief pursuant to Chapter 11 of the Bankruptcy Code.

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

5. An order granting the Joint Administration of the Debtors' cases was entered by the Court on August 14, 2026 [Dkt. No. 62].

6. No official committee of unsecured creditors has been appointed by the Office of the United States Trustee for the Northern District of Ohio in this case.

7. Simultaneously with the filing of their petitions, the Debtors filed the Declaration of Sister Nancy Linenkugel, OSF, DM in support of their petitions for relief and the Declaration of John T. Hillyer, chief restructuring officer, in support of the first day motions (together, the "**First Day Declaration**"). A more detailed factual background of the Debtors' businesses and operations, as well as the events leading to the filing of this chapter 11 case is more fully set forth in the First Day Declarations and incorporated herein by reference.

BACKGROUND

8. Approximately six (6) months prior to the Petition Date, the University entered into Severance Agreements (the "**Severance Agreements**") with many of its employees, pursuant to which the employees would receive severance payments upon their termination of employment of between $3,280 and $54,500, as well as a $2,000 health stipend and continued use of their laptop computers (the "**Severance Payments**"). The Severance Payments were to be made at the same time as the employees received their final paycheck. The Severance

Agreements recognized the importance of each one of the employees to the University's operations as a noted university, no matter what role they played.

9. Prior to the Petition Date, there were Severance Payments (the "**Pre-Petition Severance Payments**") made to approximately 100 employees in multiple tranches depending on when the employee received their final paycheck, which, including taxes, totaled $913,107.75 (the "**Pre-Petition Severance Recipients** ")[2].

10. A portion of the Pre-Petition Severance Payments were funded by the University with the proceeds of loans by the Sisters of Saint Francis of Sylvania, Ohio ("**SOSF**") to the Debtors in the principal amount of $650,000 (the "**$650,000 Loan**"). The $650,000 Loan is secured by a mortgage dated June 14, 2026, SOSF which encumbers the recreation center and certain other real property owned by the Debtors as well as certain real property owned by a non-debtor subsidiary of the University (the "**$650,000 Mortgage**").

11. In addition, prior to the Petition Date, SOSF made available to the Debtors a line of credit evidenced by an amended and restated Promissory Note dated June 14, 2026 in the sum of $1,250,000, as modified by an Allonge to Note dated July 29, 2026 increasing the principal amount to $2,600,000 (the "**Line of Credit Loan**"), secured by a mortgage encumbering the same real property that is subject to the $650,000 Mortgage (the "**Line of Credit Mortgage**"). As of the Petition Date, principal equal to $2,063,917.00 was outstanding under the Line of Credit Loan.

12. As the Court was advised at prior hearings subject to approval by this Court of a release by the Debtors of all claims (including under Chapter 5 of the Bankruptcy Code) against

[2] A list of the Pre-Petition Severance Recipients and the Pre-Petition Severance Payment each received is attached hereto as Schedule 1.

Pre-Petition Severance Recipients relating in any way to their receipt of the Pre-Petition Severance Payments, SOSF agreed that it would (a) forgive all principal and accrued interest on the $650,000 Loan and satisfy of record the $650,000 Mortgage, and (b) reduce the amount due on the Line of Credit Loan by an amount equal to the total of the Pre-Petition Severance Payments minus the principal and interest due on the $650,000 Loan as of the date of its forgiveness. That amount is estimated to be $263,107.75, *before* reduction of the interest on the $650,000 Mortgage. The foregoing is referenced herein as the "**Settlement**."

13. Pursuant to the Settlement, SOSF did not ask for and will not receive any benefits, tangible or intangible; they only asked that the monies already paid to the Pre-Petition Severance Recipients not be exposed to claims (including avoidance actions) resulting from their receipt of the Pre-Petition Severance Payments, which claims the Debtors do not think are viable in any event. Not only are Debtors barred from pursuing any avoidance actions if the amount paid to the recipient is less than $8,575 (which many are), but it is a virtual certainty that the estate would not recover the entire $913,107.75 paid in Pre-Petition Severance from the Pre-Petition Severance Recipients and even commencing the actions comes at a cost to the estate. If the Settlement is not approved, SOSF will not waive its claims against the Debtors for the Pre-Petition severance Payments, nor will it satisfy the $650,0000 Mortgage, or reduce the Line of Credit Mortgage by approximately $263,107.75. Thus, any dollar less than $913,107.75 recovered from the Pre-Petition Severance Recipients is a dollar taken from unsecured creditors in the Debtors' estates. In the Debtors' opinion, the Settlement sought to be approved by this Motion is, as they say, a "no-brainer." No matter how you slice it, the relief being requested is certainly above the "lowest range of reasonableness" and should therefore be approved.

THE SETTLEMENT SHOULD BE APPROVED UNDER BANRUPTCY RULE 9019

14. Bankruptcy Rule 9019 authorizes the Court, after notice and a hearing, to approve a compromise or settlement. Fed. R. Bankr. P. 9019(a). In the Sixth Circuit, a bankruptcy court must determine whether a proposed settlement is fair and equitable and in the best interests of the estate. *In re Bard*, 49 Fed. App'x. 528, 530 (6th Cir. 2002) (Court of Appeals holding that a "bankruptcy court is charged with an affirmative obligation to apprise itself 'of all facts necessary to evaluate the settlement and make an 'informed and independent judgment'' as to whether the compromise is fair and equitable[]" and holding that the bankruptcy court for the Northern District of Ohio did not abuse its discretion in evaluating and approving the settlement).

15. Importantly however, "[a] bankruptcy judge need not hold a mini-trial or write an extensive opinion every time he approves or disapproves a settlement. The judge need only apprise himself of the relevant facts and law so that he can make an informed and intelligent decision, and set out the reasons for his decision." *In re MQVP, Inc.*, 477 Fed. Appx. 310, 313 (6th Cir. 2012) (quoting *In re Am. Corp.,* 841 F.2d 159, 163 (7th Cir.1987). The court must apprise itself of the underlying facts and exercise independent judgment. *In re Greektown Holdings, LLC*, 728 F3d 567, 575 (6th Cir. 2013). Relevant factors include the probability of success in litigation, difficulties in collection, the complexity, expense, inconvenience, and delay of litigation, and the paramount interests of creditors with proper deference to their reasonable views. *Id.* ("*Bard* sets out four factors that a bankruptcy court should consider when evaluating the fairness of a settlement" and citing the four factors in a footnote). The Settlement satisfies these factors.

16. The Settlement is a sound exercise of the Debtor's business judgment. *See In re Pbreia, LLC*, No. 25-42439-MXM11, 2026 WL 1494068, at *7 (Bankr. N.D. Tex. May 27, 2026) (finding that the settlement agreement was an exercise of sound business judgment because it was product of good-faith negotiations resolving issues without the need for costly and protracted litigation), and the first two *Bard* factors are satisfied. The estate will receive tangible consideration by a reduction in secured debt by the amount of $913,107.75. On the other hand, without the Settlement, the Debtor would need to commence approximately 80 actions against the Employees. It is unclear what, if any, defenses the Pre-Petition Severance Recipientswill raise. Even if there were no defenses and the Debtor were able to obtain judgments against all Pre-Petition Severance Recipients, the cost of execution would be significant and many of these ex-employees may be judgment proof. Therefore, even if the Debtor were to obtain judgment in the total sum of the Pre-Petition Severance Payments ($913,107.75), the expenditure of fees to get there, and to collect, will undoubtedly reduce the recovery. The Debtor will never be able to obtain a recovery that is more than the total amount of the Mortgages being released; indeed, it will unequivocally be less.

17. Pursuant to the terms of the Settlement with SOSF, the Debtor will not be expected to reimburse the SOSF for the Pre-Petition Severance Payments. Further, the Pre-Petition Severance Payments will not give rise to any administrative expense, secured claim, unsecured claim, reimbursement claim, indemnity claim, or other claim against either Debtor or its estate. To the contrary, if approved, the estates will *save* $913,107.75. Accordingly, the Settlement falls within the lowest range of reasonableness, is fair and equitable, and should be approved under Rule 9019. *See Bard*, 49 F.App'x. at 530.

NOTICE

18. Notice of this Motion has been provided to the parties on the Master Service List authorized under the Court's Order Establishing Notice Procedures and Master Service List [Dkt. 60]. The Debtor submits that, under the circumstances, no other or further notice is required.

NO PRIOR REQUEST

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

CONCLUSION

WHEREFORE, the Debtor respectfully requests that the Court enter an order, substantially in the form attached hereto as **Exhibit A**, granting this Motion and granting such other and further relief as the Court deems just and proper.

Dated: Uniondale, New York
November 12, 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)
333 Earle Ovington Boulevard, 2nd Floor
Uniondale, New York 11553
mroseman@cullenllp.com
bpollack@cullenllp.com
(516) 357-3700

Schedule 1

Pre-Petition Severance Recipients

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EMPLOYEE	SEVERANCE	TAX	TOTAL
Adamovich, Ryan G.	$ 5,846.00	$ 447.22	$ 6,293.22
Alhenawi, Yasser	$ 10,462.00	$ 800.34	$ 11,262.34
Ali, Majd	$ 3,538.00	$ 270.66	$ 3,808.66
Allen, James	$ 3,538.00	$ 270.66	$ 3,808.66
Anderson, Elizabeth M.	$ 6,200.00	$ 474.30	$ 6,674.30
Ballard, Amanda J.	$ 6,231.00	$ 476.67	$ 6,707.67
Beach, Sandra M.	$ 16,627.00	$ 1,271.97	$ 17,898.97
Beauchamp, Colleen M.	$ 4,942.00	$ 378.06	$ 5,320.06
Beck, John J.	$ 5,846.00	$ 447.22	$ 6,293.22
Beggs, A. Dwayne D.	$ 15,652.00	$ 1,197.38	$ 16,849.38
Begley, Chelsea M.	$ 5,615.00	$ 429.55	$ 6,044.55
Bockbrader, Candace L.	$ 5,462.00	$ 417.84	$ 5,879.84
Bradford, Tandy S.	$ 6,413.00	$ 490.59	$ 6,903.59
Bridges, Grant D.	$ 3,280.00	$ 250.92	$ 3,530.92
Brown, Benjamin J.	$ 27,301.00	$ 2,088.53	$ 29,389.53
Brown, Howard W.	$ 11,458.00	$ 876.54	$ 12,334.54
Brown, Matthew K.	$ 3,569.00	$ 273.03	$ 3,842.03
Burkholder, Erin C.	$ 7,513.00	$ 574.74	$ 8,087.74
Chowdhury-Woodstrup, Jayeeta	$ 6,231.00	$ 476.67	$ 6,707.67
Christensen, Mark	$ 42,799.00	$ 3,274.12	$ 46,073.12
Coleman, Derick C.	$ 3,968.00	$ 303.55	$ 4,271.55
Craft, Amy D.	$ 5,077.00	$ 388.39	$ 5,465.39
Crawford, Katie J.	$ 3,569.00	$ 273.03	$ 3,842.03
Czubek, Casey L.	$ 6,170.00	$ 472.01	$ 6,642.01
Dean, Rylee R.	$ 5,761.00	$ 440.72	$ 6,201.72
DuPree, Jake C.	$ 11,038.00	$ 844.41	$ 11,882.41
Fraser, Daniel M.	$ 22,917.00	$ 1,753.15	$ 24,670.15
Frye, Cynthia L.	$ 5,900.00	$ 451.35	$ 6,351.35
Gray, Anjali D.	$ 29,302.00	$ 2,241.60	$ 31,543.60
Grinevich, Oxana A.	$ 27,363.00	$ 2,093.27	$ 29,456.27
Guerrero, Gil V.	$ 9,062.00	$ 693.24	$ 9,755.24
Gundy, Mary K.	$ 6,231.00	$ 476.67	$ 6,707.67

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Hawkins, Gaby M.	$	5,343.00	$	408.74	$	5,751.74
Heidrich, Karl J.	$	6,016.00	$	460.22	$	6,476.22
Hernandez, Therese B.	$	10,239.00	$	783.28	$	11,022.28
Hildebrand, Joell	$	9,846.00	$	753.22	$	10,599.22
Hoddinott, Destiny M.	$	5,231.00	$	400.17	$	5,631.17
Howe Jr, Billy C.	$	3,538.00	$	270.66	$	3,808.66
Inbody-Bormuth, Rachelle	$	7,885.00	$	603.20	$	8,488.20
Johnson, Mathius	$	7,836.00	$	599.45	$	8,435.45
Jordan, Sara E.	$	6,385.00	$	488.45	$	6,873.45
Karlet, Clara	$	8,058.00	$	616.44	$	8,674.44
Kelly, III, Dock	$	17,442.00	$	1,334.31	$	18,776.31
Kinsey, Krystal J.	$	12,904.00	$	987.16	$	13,891.16
Kronovich, Megan A.	$	3,569.00	$	273.03	$	3,842.03
Lauf, Brett M.	$	4,192.00	$	320.69	$	4,512.69
Laverick, Vincent T.	$	14,850.00	$	1,136.03	$	15,986.03
Lehman, Margaret	$	8,616.00	$	659.12	$	9,275.12
Leslie, Julie A.	$	7,769.00	$	594.33	$	8,363.33
Makey, Nicole L.	$	8,826.00	$	675.19	$	9,501.19
Mitchell, Ruthi	$	14,052.00	$	1,074.98	$	15,126.98
Molitor, Cindy A.	$	34,358.00	$	2,628.39	$	36,986.39
Morris, Sam S.	$	5,462.00	$	417.84	$	5,879.84
Adamovich, Ryan G.	$	5,846.00	$	447.22	$	6,293.22
Alhenawi, Yasser	$	10,462.00	$	800.34	$	11,262.34
Ali, Majd	$	3,538.00	$	270.66	$	3,808.66
Allen, James	$	3,538.00	$	270.66	$	3,808.66
Anderson, Elizabeth M.	$	6,200.00	$	474.30	$	6,674.30
Ballard, Amanda J.	$	6,231.00	$	476.67	$	6,707.67
Beach, Sandra M.	$	16,627.00	$	1,271.97	$	17,898.97
Beauchamp, Colleen M.	$	4,942.00	$	378.06	$	5,320.06
Beck, John J.	$	5,846.00	$	447.22	$	6,293.22
Beggs, A. Dwayne D.	$	15,652.00	$	1,197.38	$	16,849.38
Begley, Chelsea M.	$	5,615.00	$	429.55	$	6,044.55
Bockbrader, Candace L.	$	5,462.00	$	417.84	$	5,879.84

Roberts, Alyssa A.	$	6,077.00	$	464.89	$	6,541.89
Robertson, Steven A.	$	16,094.00	$	1,231.19	$	17,325.19
Robinson, Mary Kathryn K.	$	42,070.00	$	3,218.36	$	45,288.36
Rushford-Spence, Shawna L.	$	17,438.00	$	1,334.01	$	18,772.01
Ryan, Bonnie S.	$	6,846.00	$	523.72	$	7,369.72
Salatin, Sarah D.	$	7,000.00	$	535.50	$	7,535.50
Salisbury, Jason T.	$	5,846.00	$	447.22	$	6,293.22
Seese, Britt N.	$	4,880.00	$	373.32	$	5,253.32
Slomski, Tracy L.	$	6,460.00	$	494.19	$	6,954.19
Smith, Rhonda G.	$	9,846.00	$	753.22	$	10,599.22
Sullivan, Colleen F.	$	9,077.00	$	694.39	$	9,771.39
Summers, Tami	$	3,731.00	$	285.42	$	4,016.42
Szavuly, Erin L.	$	43,883.00	$	3,357.05	$	47,240.05
Weber, Lauren M.	$	4,746.00	$	363.07	$	5,109.07
Williams, Kristen K.	$	11,101.00	$	849.23	$	11,950.23
Wilson, Lauren T.	$	3,962.00	$	303.09	$	4,265.09
Ziegler, Jessica A.	$	9,719.00	$	743.50	$	10,462.50
					$	**913,107.75**

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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 APPROVING COMPROMISE AND SETTLEMENT PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 9019 WITH RESPECT TO PRE-PETITION PAYMENT OF SEVERANCE

Upon the motion ("**Motion**")[4] of Lourdes University, one of the above-captioned debtors and debtors-in-possession (the "**Debtor**"), for entry of an order approving a compromise and settlement pursuant to Federal Rule of Bankruptcy Procedure 9019, for the release of claims

[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 meanings ascribed to such terms in the Motion.

against the Pre-Petition Severance Recipients in exchange for reduction of claims and avoidance of liens against the estate; and the Court having jurisdiction over this matter; and this matter being a core proceeding; and due and adequate notice having been provided; and the Court having considered the Motion, the record, and any arguments presented; and after due deliberation and sufficient cause appearing;

IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED** as set forth herein.

2. The Settlement described in the Motion is approved pursuant to Bankruptcy Rule 9019.

3. The Pre-Petition Severance Recipients shall be, and hereby are, released from any and all claims that the Debtor and its estate may have (including under Chapter 5 of the Bankruptcy Code) relating in any way to their receipt of the Pre-Petition Severance Payments.

4. Within five (5) business days of the entry of this order, SOSF shall file a satisfaction of the $650,000 Mortgage, and a partial satisfaction of the Line of Credit Mortgage for the amount of $913,107.75 less the principal and interest on the $650,000 mortgage as of the date of entry of this order.

5. As soon as practicable (including waiting until other amendments need to be made), the Debtor shall amend their bankruptcy schedules to reflect the satisfactions of liens and reductions of claims described in paragraph 4 hereof.

6. Nothing in this Order shall act as a release of any claims that the Debtor, the estate, and individual creditors may have against SOSF, or of a release of the Pre-Petition Severance Recipients from any claims other than those related, in any way, to the Pre-Petition Severance Payments.

7. The Debtor is authorized to take all actions reasonably necessary to implement the relief granted by this Order.

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

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 fourteen (14) 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 12th day of November.

Master 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

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; BKecf@padgettlawgroup.com

W. Timothy Miller, of Taft Stettinius & Hollister LLP, on behalf of the Charles E. Schell Foundation, at miller@taftlaw.com; CIN_Docket_Assist@taftlaw.com; welcht@taftlaw.com

Steven L. Diller, of Diller & Rice, LLC, on behalf of Ascension Commercial Realty, at Steven@drlawllc.com; kim@drlawllc.com; eric@drlawllc.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 bnccnotifications@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 tcoyle@hrsa.gov

Mike Tumminello, on behalf of Dynamic Campus Solutions Inc, at Mike.Tumminello@dynamiccampus.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 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 APPROVING COMPROMISE AND SETTLEMENT PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 9019 WITH RESPECT TO PRE-PETITION PAYMENT OF SEVERANCE

Upon the motion ("**Motion**")[4] of Lourdes University, one of the above-captioned debtors and debtors-in-possession (the "**Debtor**"), for entry of an order approving a compromise and settlement pursuant to Federal Rule of Bankruptcy Procedure 9019, for the release of claims

[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 meanings ascribed to such terms in the Motion.

against the Pre-Petition Severance Recipients in exchange for reduction of claims and avoidance of liens against the estate; and the Court having jurisdiction over this matter; and this matter being a core proceeding; and due and adequate notice having been provided; and the Court having considered the Motion, the record, and any arguments presented; and after due deliberation and sufficient cause appearing;

IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED** as set forth herein.

2. The Settlement described in the Motion is approved pursuant to Bankruptcy Rule 9019.

3. The Pre-Petition Severance Recipients shall be, and hereby are, released from any and all claims that the Debtor and its estate may have (including under Chapter 5 of the Bankruptcy Code) relating in any way to their receipt of the Pre-Petition Severance Payments.

4. Within five (5) business days of the entry of this order, SOSF shall file a satisfaction of the $650,000 Mortgage, and a partial satisfaction of the Line of Credit Mortgage for the amount of $913,107.75 less the principal and interest on the $650,000 mortgage as of the date of entry of this order.

5. As soon as practicable (including waiting until other amendments need to be made), the Debtor shall amend their bankruptcy schedules to reflect the satisfactions of liens and reductions of claims described in paragraph 4 hereof.

6. Nothing in this Order shall act as a release of any claims that the Debtor, the estate, and individual creditors may have against SOSF, or of a release of the Pre-Petition Severance Recipients from any claims other than those related, in any way, to the Pre-Petition Severance Payments.

7. The Debtor is authorized to take all actions reasonably necessary to implement the relief granted by this Order.

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