

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re:

The Roman Catholic Diocese of Syracuse,
New York,

Debtor.

Case No. 20-30663

Chapter 11

NOTICE OF CHAPTER 11 FILING AND FIRST DAY MOTIONS

PLEASE TAKE NOTICE that on June 19, 2020 (the “Petition Date”), The Roman Catholic Diocese of Syracuse, New York (the “Diocese”) filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (11 U.S.C. §§ 101 *et seq.*, the “Bankruptcy Code”) in the United States Bankruptcy Court for the Northern District of New York (the “Bankruptcy Court”).

PLEASE TAKE FURTHER NOTICE that in connection with the Diocese’s above-captioned chapter 11 case (the “Chapter 11 Case”), the Diocese filed on the Petition Date the following motions and applications (collectively, the “First Day Motions”).

1. Motion for Entry of an Order Authorizing the Diocese to File Portions of Schedule F, the Statement of Financial Affairs, the Master Creditor Mailing Matrix, Certain Certificates of Service and Other Pleadings and Documents Under Seal (the “Motion to File Under Seal”) [Docket No. 8];
2. Motion for Entry of Interim and Final Orders (A) Authorizing the Use of Cash Collateral, and (B) Granting Adequate Protection (the “Cash Collateral Motion”) [Docket No. 9];
3. Motion for Entry of Interim and Final Orders Authorizing the Diocese to (A) Pay Prepetition Compensation and Reimbursable Employee Expenses, (B) Pay and Honor Medical and Other Employee Benefits and (C) Continue Employee Benefit Programs (the “Wages Motion”) [Docket No. 10];
4. Motion for Interim and Final Orders (A) Authorizing, But Not Directing, the Diocese to (i) Continue Using Existing Bank Accounts, Banking Practices and Business Forms, (ii) Maintain Investment Accounts and Practices, and (iii) Continue Using Credit Cards, and (B) Granting Limited Relief from the Requirements of Bankruptcy Code Section 345(b) (the “Cash Management Motion”) [Docket No. 11];
5. Motion for Entry of Interim and Final Orders (A) Prohibiting Utility Companies from Altering, Refusing or Discontinuing Service on Account

of Prepetition Amounts Due, (B) Determining Adequate Assurance of Payment for Post-Petition Utility Services Under 11 U.S.C. Section 366, and (C) Establishing Procedures for Determining Adequate Assurance of Payment (the “Utility Motion”) [Docket No. 12];

6. Motion for Entry of Interim and Final Orders (i) Authorizing the Continued Maintenance of the Diocese’s Insurance Program and Health Plan; and (ii) Authorizing Payment of Prepetition Obligations in Respect Thereof (the “Insurance Premium Motion”) [Docket No. 13]
7. Motion for Entry of an Order Pursuant to Bankruptcy Rules 1007(c) and 9006(b)(1) Extending Time to File Schedules of Assets and Liabilities, Schedules of Current Income and Expenditures, Schedules of Executory Contracts and Unexpired Leases and Statements of Financial Affairs (the “Schedules Extension Motion”) [Docket No. 14];
8. Application for Appointment of Stretto as Claims and Noticing Agent *Nunc Pro Tunc* to the Petition Date (the “Stretto Section 156 Application”) [Docket No. 15]; and
9. Application for Entry of an Order Authorizing the Employment and Retention of Stretto as Administrative Advisor *Nunc Pro Tunc* to the Petition Date (the “Stretto Section 327 Application”) [Docket No. 16].

PLEASE TAKE FURTHER NOTICE that on June 19, 2020, the Bankruptcy Court held an initial hearing with respect to certain of the First Day Motions.

PLEASE TAKE FURTHER NOTICE that on June 24, 2020, the Bankruptcy Court entered orders granting the Schedules Extension Motion and the Stretto Section 156 Application on a final basis [Docket Nos. 29 and 32 respectively], and orders granting the Motion to File Under Seal, Cash Collateral Motion, Wages Motion, Cash Management Motion, Utility Motion, and Insurance Motion on an interim basis [Docket Nos. 24, 25, 26, 31, 27, and 28 respectively] (collectively, the “First Day Orders”).

PLEASE TAKE FURTHER NOTICE that a hearing to consider those First Day Motions which have not been previously granted by the Bankruptcy Court on a final basis will be held on July 23, 2020, at 12:00 p.m. (prevailing Eastern time), before the Honorable Margaret Cangilos-Ruiz, United States Bankruptcy Judge or such other judge as may be sitting in her stead, in the United States Bankruptcy Court for the Northern District of New York, United States Courthouse, 100 South Clinton Street, Syracuse, New York.

PLEASE TAKE FURTHER NOTICE that any objections or responses to the relief requested in the First Day Motions to be heard on July 23, 2020 must be filed and served as required by the Local Rules of Bankruptcy Procedure for the Northern District of New York on or before July 17, 2020 at 4:00 p.m. (prevailing Eastern time).

PLEASE TAKE FURTHER NOTICE that, copies of the First Day Motions, the First Day Orders, and all other documents filed in this Chapter 11 Case may be obtained free of charge at the Diocese's case management website (<https://case.stretto.com/DioceseofSyracuse>) or by contacting the undersigned proposed counsel for the Diocese.

Dated: June 25, 2020

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