

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK

In re:

The Diocese of Buffalo, N.Y.,

Debtor.

Case No. 20-10322 (CLB)

Chapter 11

NOTICE OF *DE MINIMIS* REAL ESTATE ASSET SALE

PLEASE TAKE NOTICE, that on February 28, 2020, The Diocese of Buffalo, N.Y. (the “Diocese”) filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code with the United States Bankruptcy Court for the Western District of New York (the “Court”), commencing the Diocese’s chapter 11 case.

PLEASE TAKE FURTHER NOTICE that, on October 23, 2025, the Court entered an *Order Establishing Procedures Pursuant to Bankruptcy Code Sections 105(a) and 363 and Federal Rule of Bankruptcy Procedure 6004, for the Sale of De Minimis Real Estate Assets Free and Clear of Liens, Claims, and Encumbrances* [Docket No. 4281] (the “De Minimis Asset Sale Order”) whereby the Court authorized the Diocese to sell certain real estate assets within specific economic parameters (collectively, the “De Minimis Assets”).

PLEASE TAKE FURTHER NOTICE that, pursuant to the *De Minimis Asset Sale Order*, the Diocese is seeking to sell the *De Minimis Assets* as set forth in detail on ***Schedule A*** attached hereto (the “De Minimis Asset Sale”).

PLEASE TAKE FURTHER NOTICE that, Objections, if any, to the *De Minimis Asset Sale* must conform to the Federal Rules of Bankruptcy Procedure and the Local Bankruptcy Rules for the Western District of New York and be served in accordance with Local Rule 9013-1 upon the following parties no later than November 3, 2025: (i) counsel to the Diocese, Bond, Schoeneck & King, PLLC, One Lincoln Center, Syracuse, New York 13202, Attn: Stephen A. Donato, Charles J. Sullivan, Grayson T. Walter, Sara Temes, and Justin S. Krell, (ii) the Office of the United States Trustee for the Western District of New York, 300 Pearl Street, Suite 401, Buffalo, NY 14202. Attn: Joseph W. Allen, (iii) counsel to the Official Committee of Unsecured Creditors, Pachulski, Stang, Ziehl & Jones, LLP, 10100 Santa Monica Blvd., 13th Floor, Los Angeles, California, 90067-4003, Attn. James I. Stang, and 780 Third Avenue, 34th Floor, New York, New York, 10017-2024, Attn. Ilan Scharf, and (iv) those persons who have formally appeared and requested service in this case pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure.

PLEASE TAKE FURTHER NOTICE that, for any Objections not withdrawn or resolved, the Diocese shall file a notice of hearing to consider the unresolved Objection(s), and such hearing shall be held on an expedited basis, subject to the Court’s availability to hear and consider the Objection. If the Objection(s) are overruled or withdrawn, or if the sale of *De Minimis Assets* is approved by further order of the Court, the Diocese shall be authorized to immediately

consummate the *De Minimis* Asset Sale in accordance with the terms of the *De Minimis* Asset Sale Order.

PLEASE TAKE FURTHER NOTICE that, if no Objection(s) to the *De Minimis* Asset Sale are filed or served by the Objection Deadline, the *De Minimis* Asset Sale will be deemed final and fully authorized by the Court under the terms of the *De Minimis* Asset Sale Order, and no further notice or Court approval to consummate the *De Minimis* Asset Sale will be required or necessary and the Diocese shall be authorized to immediately consummate the *De Minimis* Asset Sale in accordance with the terms of the *De Minimis* Asset Sale Order.

Dated: October 27, 2025

BOND, SCHOENECK & KING, PLLC

By: /s/Justin S. Krell

Stephen A. Donato
Charles J. Sullivan
Grayson T. Walter
Sara Temes
Justin S. Krell
One Lincoln Center
Syracuse, NY 13202-1355
Telephone: (315) 218-8000
Fax: (315) 218-8100
Emails: sdonato@bsk.com
csullivan@bsk.com
gwalter@bsk.com
stemes@bsk.com
jkrell@bsk.com

Attorneys for The Diocese of Buffalo, N.Y

SCHEDULE A

***De Minimis* Real Estate Asset(s) to be Sold**

- I. *De Minimis* Asset(s) to Be Sold and Their Location
 - a. The proposed De Minimis sale relates to the fifteen (15) acre parcel of vacant land on South Park Avenue, Hamburg, New York (Tax Map Parcel No. 183.09-5-13.1).
- II. Purchaser(s) of the *De Minimis* Asset(s)
 - a. Purchaser for this De Minimis Sale is Mr. John Keem III. The Diocese does not have a relationship with Mr. Keem.
- III. Parties Holding Liens Against the *De Minimis* Asset(s)
 - a. NONE
- IV. Economic Terms and Conditions of the *De Minimis* Asset(s) Sale
 - a. The proposed De Minimis sale is Twenty-Seven Thousand Dollars (\$27,000.00) cash transaction.
- V. Broker(s) Entitled to Commission and Amount of Commission Owed
 - a. There are two Real Estate Brokers related to the proposed De Minimis sale: (i) Hanna CRE and (ii) WNY Metro Roberts Realty. Upon closing, Seller will pay \$1,620.00 in brokerage fees, which will be evenly split between the brokers.