

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 Western District Local Rules of Bankruptcy Procedure for New York and be served in accordance with Local Rule 9013-1 upon the following parties no later than June 9, 2026, (7 days after filing and service of the Sale Notice): (i) counsel to the Diocese, Bond, Schoeneck & King, PLLC, One Lincoln Center, Syracuse, New York 13202, Attn: Stephen A. Donato, Charles J. Sullivan, 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PLEASE TAKE FURTHER NOTICE that, for any Objections not withdrawn or resolved, the Diocese shall file a notice of hearing to consider the unresolved Objection(s), and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: June 2, 2026
Syracuse, New York

BOND, SCHOENECK & KING, PLLC

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SCHEDULE A

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

- I. *De Minimis* Asset(s) to Be Sold and Their Location
 - a. Real property located at 36 East Main Street, Panama, New York 14767 (the “Real Property”).
 - b. The Real Property consists of approximately 5.73 acres of vacant land.¹
- II. Purchaser(s) of the *De Minimis* Asset(s)
 - a. Carrie Munsee and David Munsee (the “Purchasers”).
- 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 purchase price of the Real Property is \$18,333.00 (the “Purchase Price”) in cash or certified funds upon closing.²
- V. Broker(s) Entitled to Commission and Amount of Commission Owed
 - a. Turner Brokers, Inc., doing business as Century 21 Turner Brokers (“Broker”) is entitled to a fee of six percent (6%) of the Purchase Price.
 - b. In the event that the Purchasers are represented by a separate broker (the “Cooperating Broker”), who has registered with Broker, Broker is authorized to compensate such Cooperating Broker three percent (3%) of the Purchase Price.

¹ The purchase contract entails two parcels of land consisting of the Real Property, and the adjacent parcel that is owned by Our Lady of The Snows Roman Catholic Church Society of Panama, N.Y. parish (the “Parish”) comprising approximately 1.37 acres, which parcel includes a church building.

² The Purchase Price represents 13.33% of the purchase contract value. The remaining 86.67% (\$119,167.00) of the purchase contract value is apportioned to the value of the adjacent parcel owned by the Parish. The apportionment percentages are based on information provided by the Diocese’s realtor and appraiser.