

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 be filed with the Court and be served upon the following parties in accordance with the *De Minimis Asset Sale Order* by no later than **4:00 p.m. (prevailing Eastern Time) on July 14, 2026** (7 days after filing and service of this 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PLEASE TAKE FURTHER NOTICE that, for any Objections not withdrawn or resolved, the Diocese shall file a notice of hearing to consider the unresolved Objection(s), and such hearing shall be held on an expedited basis, subject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: July 7, 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. A portion of the real property located at 306 Ingham Avenue, Lackawanna, New York 14218 (the “Real Property”).
 - b. The Real Property consists of approximately 0.35 acres of land, including a community center and a portion of a church building.¹
- II. *Purchaser(s) of the De Minimis Asset(s)*
 - a. Lackawanna Yemen Soccer Club, Inc. (the “Purchaser”).
- 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 \$40,000 (the “Purchase Price”) in cash or certified funds upon closing.²
- V. *Broker(s) Entitled to Commission and Amount of Commission Owed*
 - a. Keller Williams Realty (“Broker”) is the Purchaser’s Broker entitled to a fee of three percent (3%) of the Purchase Price.

¹ The Real Property is adjacent to land owned by St. Anthony’s Roman Catholic Church Society of Lackawanna, New York (the “Parish”). Situated upon the Parish-owned land (the “Parish Land Parcel”) are a church building and rectory, and two parking lots. The total lot size of the Real Property and the Parish Land Parcel is approximately 1.4 acres.

² The purchase contract value is \$550,000, of which the Purchase Price represents approximately 7.2%. The remaining 92.8% (\$510,000) of the purchase contract value is apportioned to the value of the Parish Land Parcel as well as three nearby parcels (278 Ingham Avenue, 282 Ingham Avenue, and vacant land situated at Lehigh Avenue) which are also owned by the Parish. The apportionment percentages are based on information provided by the Parish’s appraiser.