

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF VERMONT**

In re:

Roman Catholic Diocese of Burlington,
Vermont,¹

Debtor.

Case No.: 24-10205-HZC
Chapter 11 Case

**NOTICE OF MOTION FOR ENTRY OF AN ORDER UNDER 11 U.S.C. § 363(f)
AUTHORIZING THE SALE OF THE LORETTO HOME FREE AND CLEAR OF ALL
LIENS, CLAIMS, AND INTERESTS**

A **MOTION FOR** entry of an order under 11 U.S.C. § 363(f) authorizing the sale of the Loretto Home free and clear of all liens, claims, and interests was filed on August 26, 2025, by the Roman Catholic Diocese of Burlington, Vermont (the “Diocese”), through its attorneys, Fredrikson & Byron, P.A. (ECF No. 448.) An electronic copy of the motion can be accessed at the following link: <https://case.stretto.com/dioceseofburlington/docket>.

IF YOU OPPOSE THE MOTION, you must file a written response with the Clerk of Court specifying your opposition to the motion, **on or before 4:00 P.M. (prevailing Eastern time) on Tuesday, September 23, 2025**. If you file a written objection, you must also serve a copy of that written objection on the Diocese’s attorneys, the United States trustee, and the Committee and its attorneys so that it is received on or before such date and time. Addresses for those parties are set forth below.

IF A RESPONSE TO THE MOTION IS TIMELY FILED, the Court will hold a hearing on the motion and any response at **11:00 A.M. (prevailing Eastern time) on Tuesday, September 30, 2025** at the following location: Federal Building, 11 Elmwood Ave, Room 200,

¹ In accordance with Fed. R. Bankr. P. 2002(n) and 1005 and 11 U.S.C. § 342(c), as applicable, the Diocese’s address is 55 Joy Drive, South Burlington, Vermont 05403, and its Employer Identification Number (EIN) is 03-0180730.

Burlington, VT 05401, unless the Court deems no hearing is necessary and enters an order prior to the time set for hearing.

You may appear for the above scheduled hearing: (a) in person at the location listed above; *or* (b) if you meet the criteria for appearing at remote hearings set forth in Appendix IX to the Court's Local Rules (available on the Court's website), you may appear virtually by using the Zoomgov application on an electronic device. If you are eligible for remote participation and choose to appear by Zoomgov, you must follow the process set forth in Appendix IX, including requirements regarding use of both audio and video components, notice to the courtroom deputy, and limitations of remote participation. If you have any questions regarding this process, you are encouraged to contact the courtroom deputy by email at Jody_Kennedy@vtb.uscourts.gov or by telephone at (802) 657-6404.

IF NO RESPONSE IS TIMELY FILED, the Court **may** deem the motion unopposed and grant the motion without further hearing. Note: If an order has not been entered before the hearing date, the hearing shall proceed and the Diocese must appear.

Dated: August 26, 2025

/s/ Steven R. Kinsella

Raymond J. Obuchowski

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SERVICE ADDRESSES

Roman Catholic Diocese of Burlington, Vermont c/o Fredrikson & Byron, P.A. Attn: Samuel M. Andre 60 South Sixth Street Suite 1500 Minneapolis, MN 55402 sandre@fredlaw.com	United States Trustee Attn: Lisa M. Penpraze Leo O'Brien Federal Building Room 620 Albany, NY 12207 Lisa.Penpraze@usdoj.gov	Creditors' Committee c/o Pachulski Stang Ziehl & Jones Attn: Brittany Mitchell Michael 1700 Broadway, 36th Floor New York, NY 10019 bmichael@pszjlaw.com
Roman Catholic Diocese of Burlington, Vermont c/o Obuchowski Law Office Attn: Raymond J. Obuchowski 1542 Route 107 PO Box 60 Bethel, VT 05032 Ray@oeblaw.com	Creditors' Committee c/o Lemery Greisler LLC Attn: Paul A. Levine 677 Broadway, 8th Floor Albany, NY 12207 plevine@lemerygreisler.com	