

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11  
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THE CHRISTIAN BROTHERS' INSTITUTE, *et al.* : Case No.: 11-22820 (RDD)  
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Debtors. : (Jointly Administered)  
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**NOTICE OF BAR DATES FOR FILING OF GENERAL PROOFS OF CLAIM**

TO ALL PERSONS AND ENTITIES WITH CLAIMS AGAINST THE CHRISTIAN BROTHERS' INSTITUTE AND THE CHRISTIAN BROTHERS OF IRELAND, INC.:

**PLEASE TAKE NOTICE** that on April 28, 2011 (the "Petition Date") The Christian Brothers' Institute ("CBI") and The Christian Brothers of Ireland, Inc. ("CBOI") each a debtor and debtor in possession in the above-captioned cases (collectively, the "Debtors") filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Southern District of New York (the "Court"). The Debtors, their addresses, case numbers, proof of claim forms and other relevant information related to these Chapter 11 cases may be obtained at: [www.omnimgt.com/TheChristianBrothers](http://www.omnimgt.com/TheChristianBrothers).

**PLEASE TAKE FURTHER NOTICE** that on February 10, 2012, the Court entered an order (the "Bar Date Order") establishing certain claims bar dates in the Debtors' Chapter 11 cases. By the Bar Date Order, the Court established **May 11, 2012 at 4:00 p.m. (prevailing Eastern Time)**, as the date by which general claims must be filed (the "General Bar Date"). Except as described below, the Bar Date Order requires all Entities, including Governmental Units, that have or assert any prepetition Claims against the Debtors to file proofs of claim with Omni Management Group, the Court-appointed claims and noticing agent in these cases (the "Claims Agent"), so that their proofs of claim are received by the Claims Agent on or before 4:00 p.m. (prevailing Eastern Time) on the applicable bar date set forth herein. Please note that the terms "Entity," "Governmental Unit" and "Claim" are defined below.

**PLEASE TAKE FURTHER NOTICE** that for your convenience, enclosed with this notice (the "General Creditor Bar Date Notice") is a proof of claim form (the "General Creditor Proof of Claim Form"). If this notice does not include a proof of claim form, a proof of claim form may be obtained from the Claims Agent at: [www.omnimgt.com/TheChristianBrothers](http://www.omnimgt.com/TheChristianBrothers).

## KEY DEFINITIONS

- As used in this Notice, the term “Entity” has the meaning given to it in section 101(15) of the Bankruptcy Code, and includes all persons (individuals, partnerships and corporations), estates, trusts, Governmental Units and the United States Trustee.
- As used in this Notice, the term “Governmental Unit” has the meaning given to it in section 101(27) of the Bankruptcy Code and includes the United States, States, commonwealths, districts, territories, municipalities, foreign states, or departments, agencies or instrumentalities of the foregoing.
- As used in this Notice, the term “Claim” shall mean, as to or against the Debtors and in accordance with section 101(5) of the Bankruptcy Code: (i) any right to payment, whether or not such right is reduced to judgment, liquidated, unliquidated, fixed, contingent, matured, unmatured, disputed, undisputed, legal, equitable, secured or unsecured; or (ii) any right to an equitable remedy for breach of performance if such breach gives rise to a right to payment, whether or not such right to an equitable remedy is reduced to judgment, fixed, contingent, matured, unmatured, disputed, undisputed, secured or unsecured.

**A CLAIMANT SHOULD CONSULT AN ATTORNEY IF THE CLAIMANT HAS ANY QUESTIONS, INCLUDING WHETHER SUCH CLAIMANT MUST FILE A PROOF OF CLAIM. A CLAIMANT MAY ALSO OBTAIN INFORMATION FROM THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS BY CALLING 1-888-667-4266.**

### **I. WHO MUST FILE A PROOF OF CLAIM AND THE APPLICABLE BAR DATES**

- A. ***The Bar Dates:*** The Bar Date Order establishes the following applicable bar dates for filing proofs of claim in these cases:
1. **The General Bar Date.** Except as set forth below, pursuant to the Bar Date Order, all Entities, including Governmental Units, holding Claims against the Debtors (whether secured, unsecured priority, or unsecured non-priority) that arose prior to or on April 28, 2011, are required to file proofs of claim by the General Bar Date – **May 11, 2012 at 4:00 p.m. (prevailing Eastern Time).**
  2. **The Rejection Bar Date.** Any Entity whose Claim arises out of the Court-approved rejection of an executory contract or unexpired lease, in accordance with section 365 of the Bankruptcy Code and pursuant to an order entered prior to the confirmation of a Chapter 11 plan(s) in the Debtors’ Chapter 11 cases, must file a proof of claim on or before the later

of: (i) the General Bar Date; (ii) 4:00 p.m. (prevailing Eastern Time) on the date that is thirty (30) days after entry of an order approving the rejection of an executory contract or unexpired lease pursuant to which the entity asserting the Rejection Damages Claim is a party. The later of these dates is referred to in this Notice as the “Rejection Bar Date.”

B. **Entities that MUST File Proofs of Claims by the General Bar Date:** Subject to the terms described above for holders of Claims subject to the Rejection Bar Date and except as set forth in paragraph “C” below, the following Entities (including Governmental Units) must file proofs of claim on or before the General Bar Date:

1. Any person or entity whose pre-petition claim against the Debtors is not listed in the Debtors’ Schedules or whose pre-petition claim is listed in the Schedules but is listed as disputed, contingent or unliquidated and that desires to participate in these cases or share in any distribution in these cases; and
2. Any person or entity that believes that its pre-petition claim is improperly classified in the Schedules or is listed in an incorrect amount and that desires to have its claim allowed in a classification or amount other than that identified in the Schedules.

**PLEASE NOTE THAT INDIVIDUALS ASSERTING CLAIMS ARISING FROM SEXUAL ABUSE FOR WHICH SUCH INDIVIDUALS BELIEVE THE CHRISTIAN BROTHERS’ INSTITUTE AND/OR THE CHRISTIAN BROTHERS OF IRELAND, INC. MAY BE LIABLE ARE INSTRUCTED TO FILE A SEXUAL ABUSE PROOF OF CLAIM FORM, CONSISTENT WITH THE BAR DATE ORDER AND THE SEXUAL ABUSE BAR DATE NOTICE. CLAIMANTS MAY OBTAIN COPIES OF THESE FORMS FROM THE CLAIMS AGENT, AT THE ADDRESSES SET FORTH HEREIN.**

C. **Entities NOT Required to File Proofs of Claim by the General Bar Date:** The Bar Date Order further provides that the following Entities need not file proofs of claim by the General Bar Date or the Rejection Bar Date, as applicable:

1. Any person or entity that has already properly filed a proof of claim against the Debtors with the Clerk of the Court or with the Claims Agent;
2. Any person or entity: (a) whose claim is listed in the Schedules or any amendments thereto, and (b) whose claim is not described therein as “disputed,” “contingent,” or “unliquidated,” and (c) who does not dispute the amount or classification of its claim as set forth in the Schedules;
3. Professionals retained by the Debtors or the Committee pursuant to orders of this Court, including Omni, who assert administrative claims for

payment of fees and expenses subject to the Court's approval pursuant to §§ 330, 331, and 503(b) of the Bankruptcy Code;

4. Any person or entity that asserts an administrative expense claim against the Debtors pursuant to §§ 503(b)(1) through (9) of the Bankruptcy Code;
5. Any person or entity whose claim against the Debtors has been allowed by an order of the Court entered on or before the applicable Bar Date; and
6. Any person or entity whose claim has been paid in full.

## **II. CONSEQUENCES OF FAILURE TO FILE PROOF OF CLAIM**

**Any Entity that is required to file a proof of claim, but fails to do so by the applicable Bar Date described in this General Bar Date Notice: (i) may NOT be treated as a creditor with respect to such Claim for the purposes of voting on and distribution under any Chapter 11 plan proposed and/or confirmed in these cases; and (ii) may be forever barred, estopped, and enjoined from asserting such Claim against the Debtors (or filing a proof of claim with respect thereto), and the Debtors and their property may be forever discharged from any and all indebtedness or liability with respect to such Claim.**

**If it is unclear from the Schedules whether your Claim is disputed, contingent or unliquidated as to amount or is otherwise properly listed and classified, you must file a proof of claim on or before the applicable Bar Date. Any Entity that relies on the information in the Schedules bears responsibility for determining that its Claim is accurately listed therein.**

### **RESERVATION OF RIGHTS**

The Debtors reserve the right to: (i) dispute, or to assert offsets or defenses against, any filed Claim or any Claim listed or reflected in the Schedules as to nature, amount, liability, classification or otherwise; and (ii) subsequently designate any Claim as disputed, contingent or unliquidated. Nothing contained in this Notice shall preclude the Debtors from objecting to any Claim, whether scheduled or filed, on any grounds.

### **PROCEDURE FOR FILING PROOFS OF CLAIM**

1. One original proof of claim and one copy must be sent by mail, overnight delivery, courier or hand delivery to Omni Management Group, Christian Brothers Institute, c/o Omni Management Group, LLC, 16161 Ventura Boulevard, Suite C, PMB608, Encino, California 91436, so as to be received no later than 4:00 p.m. (prevailing Eastern Time) on the applicable General Bar Date. ***Any proof of claim submitted by facsimile or e-mail will not be accepted and will not be deemed filed until the proof of claim is submitted by the method described in the foregoing sentence.*** Proofs of claim will be deemed filed only when actually received by the Claims Agent. If you wish to receive acknowledgement of the Claims Agent's receipt of your proof of claim, you must also

submit by the General Bar Date and concurrently with submitting your original proof of claim: (i) one additional copy of your original proof of claim; and (ii) a self-addressed, stamped return envelope.

2. Proofs of claim must include all documentation required by Bankruptcy Rules 3001(c) and 3001(d), including an original or a copy of any written document that forms the basis of the Claim or, for secured Claims, evidence that the alleged security interest has been perfected.

#### **ADDITIONAL INFORMATION**

1. You may be listed as the holder of a Claim against the Debtors in the Schedules. If you hold or assert a Claim that is not listed in the Schedules or if you disagree with the amount or priority of your Claim as listed in the Schedules, or your Claim is listed in the Schedules as contingent, unliquidated, or disputed, you must file a proof of claim. Copies of the Schedules and the Bar Date Order are available for inspection during regular business hours at the office of the Clerk of the Court, United States Bankruptcy Court for the Southern District of New York, 300 Quarropas Street, White Plains, NY 10601. In addition, copies of the Debtors' Schedules and Bar Date Order may be viewed on the Internet at: (i) the Court's website (<http://www.nysb.uscourts.gov>) by following the directions for accessing the ECF system on such website (a PACER password is required); or (ii) the Claims Agent's Debtors-designated website at [www.omnimgt.com/TheChristianBrothers](http://www.omnimgt.com/TheChristianBrothers)
2. Questions concerning the contents of this Notice and requests for proofs of claim should be directed the Debtors' Claims Agent at **1-800-873-4094** between the hours of 9:00 a.m. and 5:00 p.m. (prevailing Eastern Time), Monday through Friday. Please note that the Claims Agent's staff is not permitted to give legal advice. You should consult your own attorney for assistance regarding any other inquiries, such as questions concerning the completion or filing of a proof of claim.

Dated: February 10, 2012

BY ORDER OF THE HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE