

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re: Chapter 11
THE DIOCESE OF ST. CLOUD, a Minnesota Case No. 20-60337
religious corporation,
Debtor.

**APPLICATION TO EXTEND DEADLINE TO FILE PROOF OF CLAIM ON BEHALF
OF ALL UNKNOWN TORT CLAIMANTS**

The Diocese of St. Cloud requests the court to extend the deadline for the unknown claims representative to file a proof of claim on behalf of the unknown tort claimants up to and including October 21, 2020.

RECITALS

1. The debtor filed the above-captioned reorganization case on June 15, 2020.
2. On June 18, 2020, Michael R. Hogan was appointed as the unknown claims representative to represent the unknown tort claimants. *See Order Appointing Unknown Claims Representative* [Dkt. No. 23] (the “**Order**”).
3. Under the Order, the duties and responsibilities of the unknown claims representative include the filing of a proof of claim on behalf of all unknown tort claimants within 60 days of entry of the Order.
4. The current deadline expires on August 17, 2020.
5. The proof of claim deadline for non-governmental claims was set for October 21, 2020.

6. The debtor believes that it is reasonable for the unknown claims representative to have as much time to file unknown claims as other non-governmental claimants.

7. Debtor's counsel has conferred with counsel for the official committee of unsecured creditors and the unknown claims representative regarding the relief requested in this application. Counsel for the committee and the unknown claims representative have consented to the filing of this application and the relief requested herein.

WHEREFORE, the debtor respectfully requests that the court enter an order in the form attached hereto extending the deadline for the unknown claims representative to file a proof of claim on behalf of all unknown tort claimants up to and including October 21, 2020.

Dated: August 13, 2020.

QUARLES & BRADY LLP

/s/ Jason D. Curry

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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re: Chapter 11
THE DIOCESE OF ST. CLOUD, a Minnesota Case No. 20-60337
religious corporation,
Debtor.

**ORDER APPROVING APPLICATION TO EXTEND DEADLINE TO FILE PROOF OF
CLAIM ON BEHALF OF ALL UNKNOWN TORT CLAIMANTS**

Based on the application filed by The Diocese of St. Cloud on August 13, 2020;

IT IS ORDERED:

The unknown claims representative has up to and including October 21, 2020 to file a proof of claim on behalf of all unknown tort claimants.

ROBERT J. KRESSEL
UNITED STATES BANKRUPTCY JUDGE

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re: Chapter 11
THE DIOCESE OF ST. CLOUD, a Minnesota religious corporation, Case No. 20-60337
Debtor.

CERTIFICATE OF SERVICE

I, Jason D. Curry, declare under penalty of perjury that on August 13, 2020, I caused to be served the foregoing *Application to Extend Deadline to File Proof of Claim on Behalf of All Unknown Tort Claimants* to each party named below at the e-mail address or mailing address stated for each party:

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Unknown Claims Representative

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St. Paul, MN 55101

Internal Revenue Service
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Secretary of State
60 Empire Drive, Suite 100
St. Paul, MN 55103

Dated: August 13, 2020.

QUARLES & BRADY LLP

/s/ Jason D. Curry

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