

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA**

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In re: Chapter 11  
CROSIER FATHERS AND BROTHERS Case No. 17-41681  
PROVINCE, INC., a Minnesota non-profit  
corporation,  
Debtor.

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In re: Case No. 17-41682  
CROSIER FATHERS OF ONAMIA, a  
Minnesota non-profit corporation,  
Debtor.

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In re: Case No. 17-41683  
THE CROSIER COMMUNITY OF  
PHOENIX, an Arizona non-profit corporation,  
Debtor.

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**STIPULATION TO WITHDRAW PROOFS OF CLAIM**

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This Stipulation to Withdraw Proofs of Claim (this “Stipulation”) has been executed as of the date shown below by and between:

(a) The Church of St. Odilia of Shoreview, Minnesota, 3495 Victoria Street North, Shoreview, MN 55126, the Church of St. Joseph of West Saint Paul, 1154 Seminole Avenue, West St. Paul, MN 55118, the Church of St. Albert the Great, 2836 33rd Avenue South, Minneapolis, MN 55406 (each, a “Parish”);

- (b) Dominicans, Province of St. Albert the Great, U.S.A., 1910 S. Ashland Avenue, Chicago, IL 60608-2904 (the “Dominicans”);
  - (c) The Archdiocese of Saint Paul and Minneapolis (the “Archdiocese”); and
  - (d) The Debtors in the above-captioned cases,
- each acting through its undersigned counsel.

**RECITALS**

- 1. The Debtors filed the above-captioned bankruptcy cases on June 1, 2017. A proof of claim filing deadline was set as December 15, 2017.
- 2. On December 7, 2017, the Archdiocese timely filed the following proofs of claim in the Debtors’ bankruptcy cases as Claim No. 52 (Case No. 17-41681), Claim No. 58 (Case No. 17-41682), and Claim No. 48 (Case No. 17-41683) (collectively, the “Archdiocese Claims”).
- 3. The Parishes and the Dominicans timely filed the following Proofs of Claim:

<b><u>Case No.</u></b>	<b><u>Claimant</u></b>	<b><u>Claim No.</u></b>
17-41681	Church of St. Odilia of Shoreview, MN	7
	Church of Saint Joseph of West St. Paul, MN	8
	Dominicans Province of St. Albert the Great USA	33
17-41682	Church of St. Odilia of Shoreview, MN	8
	Church of Saint Joseph of West St. Paul, MN	10
	Dominicans Province of St. Albert the Great, Chicago, IL	39
	Church of St. Albert the Great	40
17-41683	Church of St. Odilia of Shoreview, MN	4
	Church of Saint Joseph of West St. Paul, MN	5
	Dominicans Province of St. Albert the Great, Chicago, IL	29

(the “Parish Claims” or the “Dominicans Claim”, as appropriate).

- 4. The Debtors objected to the Archdiocese Claims, the Parish Claims and the Dominicans Claims prior to the confirmation date on the joint plan of reorganization referred to below.

5. On March 26, 2018, the Bankruptcy Court entered orders confirming the modified plans of reorganization in the above-captioned bankruptcy cases.

6. In reliance on certain language included in the final modified plans of reorganization submitted in the above-captioned cases, the Archdiocese, the Parishes and Dominicans have agreed to withdraw the Archdiocese Claims, the Parish Claims, and the Dominicans Claims, respectively.

NOW, THEREFORE, it is stipulated and agreed by and between the undersigned parties (the “Stipulation”) that:

1. The Archdiocese Claims are withdrawn.
2. The Parish Claims are withdrawn.
3. The Dominicans Claims are withdrawn.
4. The motions objecting to claims filed at ECF Nos. 146, 147, 148, and 149 in Case No. 17-41681, ECF Nos. 137, 138, 139, and 140 in Case No. 17-41682, and ECF Nos. 133, 134, 135, and 142 in Case No. 17-41683 are withdrawn as moot.

5. In accordance with Local Rule 9011-4(f), the parties authorize the filer to submit this stipulation with the electronic signature of any non-filing party.

Dated: April 3, 2018

Respectfully submitted,

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**ORDER**

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This case came before the court on the stipulation of the above-captioned debtors, The Archdiocese of Saint Paul and Minneapolis, the Church of St. Odilia of Shoreview, Minnesota, the Church of St. Joseph of West Saint Paul, the Church of St. Albert the Great, and the Dominicans, Province of St. Albert the Great, USA to withdraw certain proofs of claim.

Based on the stipulation, the files and records,

IT IS ORDERED:

1. The stipulation between the above parties is approved; and

2. The following proofs of claim are deemed withdrawn:

<u>Case No.</u>	<u>Claimant</u>	<u>Claim No.</u>
17-41681	Church of St. Odilia of Shoreview, MN	7
	Church of Saint Joseph of West St. Paul, MN	8
	Dominicans Province of St. Albert the Great USA	33
	Archdiocese of Saint Paul and Minneapolis	52
17-41682	Church of St. Odilia of Shoreview, MN	8
	Church of Saint Joseph of West St. Paul, MN	10
	Dominicans Province of St. Albert the Great, Chicago, IL	39
	Church of St. Albert the Great	40
	Archdiocese of Saint Paul and Minneapolis	58
17-41683	Church of St. Odilia of Shoreview, MN	4
	Church of Saint Joseph of West St. Paul, MN	5
	Dominicans Province of St. Albert the Great, Chicago, IL	29
	Archdiocese of Saint Paul and Minneapolis	48

3. The motions objecting to the withdrawn claims identified above are deemed withdrawn and the hearing scheduled for April 12, 2018 regarding the debtors' objections to the above claims is vacated as moot.

Dated:

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Robert J. Kressel  
United States Bankruptcy Judge