IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF WISCONSIN

In re:

Case No. 11-20059-svk

ARCHDIOCESE OF MILWAUKEE,

Chapter 11

Debtor.

Hon. Susan V. Kelley

NOTICE OF JOINT MOTION OF THE DEBTOR AND CEMETERY EMPLOYEES, LOCAL 113, LABORERS INTERNATIONAL UNION OF AMERICA, AFL-CIO FOR AN ORDER APPROVING CERTAIN MODIFICATIONS TO THEIR COLLECTIVE BARGAINING AGREEMENT

PLEASE TAKE NOTICE that on March 31, 2011, the Cemetery Employees, Local 113, Laborers International Union of America, AFL-CIO ("Cemetery Union Employees") and the Archdiocese of Milwaukee, as debtor and debtor-in-possession ("Debtor" or "Archdiocese") filed a motion (the "Motion") for entry of an order approving certain modifications to their collective bargaining agreement; and

PLEASE TAKE FURTHER NOTICE that copies of the Motion are on file with the Court, Room 126, U.S. Courthouse, 517 E. Wisconsin Ave., Milwaukee, WI 53202-4581. You may also obtain copies of these pleadings by (a) contacting Pamela Bartoli at (414) 273-2100 or pbarboli@whdlaw.com; or (b) accessing the website of the Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC at www.kccllc.net/archmil.

YOUR RIGHTS MAY BE AFFECTED. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

If you do not want the Court to grant the request for relief as set forth in the Motion, or you want the Court to consider your views on the Motion, then <u>on or before April 21, 2011</u>, you or your attorney must:

File with the court your objection to the Motion, explaining your position and the reasons for your objection. You may file electronically via the Court's Case Management/Electronic Case Filing system, or mail your objection to:

Daryl L. Diesing
Bruce G. Arnold
Michael E. Gosman
WHYTE HIRSCHBOECK DUDEK S.C.
555 East Wells Street, Suite 1900
Milwaukee, Wisconsin 53202-4894
Telephone: (414) 273-2100
Faccimile: (414) 223-5000

Facsimile: (414) 223-5000 Email: ddiesing@whdlaw.com

United States Bankruptcy Court Eastern District of Wisconsin 517 East Wisconsin Avenue, Room 126 Milwaukee, WI 53202

If you mail your request to the Clerk of Court for filing, you must mail it early enough so that the Clerk's Office will receive it on or before the date stated above. You must also mail or e-mail a copy to:

Daryl L. Diesing
Whyte Hirschboeck Dudek S.C.
555 East Wells Street, Ste. 1900
Milwaukee, WI 53202-3819
ddiesing@whdlaw.com

PLEASE TAKE FURTHER NOTICE, if you or your attorney does not take these steps, the Court may decide that you do not oppose the relief sought in the Motion, and enter an order granting the relief that is requested by the Cemetery Union Employees and the Debtor.

Dated this 31st day of March, 2011.

ARCHDIOCESE OF MILWAUKEE Debtor and Debtor-in-Possession by its counsel, Whyte Hirschboeck Dudek S.C.

By: /s/ Michael E. Gosman

Daryl L. Diesing State Bar No. 1005793 Bruce G. Arnold State Bar No. 1002833 Michael E. Gosman State Bar No. 1078872

POST OFFICE ADDRESS: 555 East Wells Street, Suite 1900 Milwaukee, WI 53202 Telephone: (414) 273-2100

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