

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CORINTHIAN COLLEGES, INC., et al. ¹

Debtors.

Chapter 11

Case No. 15-10952 (KJC) Jointly Administered

Response Deadline: November 7, 2016 at 4:00 p.m. (ET)
Hearing Date: November 15, 2016 at 2:00 p.m. (ET)

**NOTICE OF MOTION OF CCI STUDENT CREDITORS TRUST FOR ENTRY OF
AN ORDER ESTABLISHING PROCEDURES REGARDING THE
RETENTION, ABANDONMENT, OR DISPOSAL OF STUDENT RECORDS**

**TO: FORMER STUDENTS² ENROLLED AT CORINTHIAN COLLEGES, INC. OR CERTAIN
CAMPUSES AFFILIATED WITH CORINTHIAN COLLEGES, INC, ALL CREDITORS, ALL
INTERESTED PARTIES, AND ALL PARTIES REQUESTING NOTICE PURUSANT TO
BANKRUPTCY RULE 2002**

PLEASE TAKE NOTICE that on October 18, 2016, Development Specialists, Inc., solely in its capacity as Trustee (the “Student Trustee”) of the CCI Student Creditors Trust (the “Student Trust”) filed the *Motion for Entry of an Order Establishing Procedures Regarding Student Records, including the Abandonment, Disposal, and/or Destruction of Certain of the Student Records* (the “Motion”).

The Student Trust’s Motion seeks an order from the Court establishing procedures for the management of student records related to former Students who attended Corinthian Colleges or any of its affiliated campuses (“Student Records”), including the abandonment, disposal, and/or destruction of certain Student Records. The Motion seeks approval of the following procedures:

- a) A small number of documents will be scanned in an identifiable and searchable format for any Student for whom the Student Trust received documents (the “Critical Documents”). The Critical Documents will be preserved electronically, and copies of the Critical Documents will be provided to Students at no charge upon request. The types of Critical Documents that will be scanned will be limited to: (i) diplomas; (ii) transcripts; (iii) student ledgers; (iv) enrollment agreements; and (v) loan documents;
- b) For any Student that sends a written request to the Student Trust **no later than 90 days after service of this Notice**, the Student Trust, or its professionals, will: (i) attempt to identify all records pertaining to that Student; (ii) scan the documents for that Student; and (iii) provide that Student with electronic

¹ The Debtors’ bankruptcy cases are: Corinthian Schools, Inc. Case No. 15-10955 (KJC); Rhodes Colleges, Inc. Case No. 15-10957 (KJC); Florida Metropolitan University, Inc., Case No. 15-10962 (KJC); Corinthian Property Group, Inc. Case No. 15-10966 (KJC); Titan Schools, Inc. Case No. 15-10970 (KJC); Career Choices, Inc. Case No. 15-10972 (KJC); Sequoia Education, Case No. 15-10974 (KJC); Eton Education, Inc., Case No. 15-10961 (KJC); Ashmead Education, Inc., Case No. 15-10967(KJC); MJB Acquisition Corporation, Case No. 15-10971 (KJC); ECAT Acquisition, Inc., Case No. 15-10975; (KJC) Pegasus Education, Inc., Case No. 15-10953 (KJC); Grand Rapids Education Center, Inc., Case No. 15-10956 (KJC); Rhodes Business Group, Inc., Case No. 15-10959 (KJC); Everest College Phoenix, Inc., Case No. 15-10960 (KJC); CDI Education USA, Inc. Case No. 15-10963 (KJC); SP PE VII-B Heald Holdings Corp., Case No. 15-1096 5(KJC); SD III-B Heald Holdings Corp., Case No. 15-10968 (KJC); Heald Capital LLC. Case No. 15-10954 (KJC); Heald Real Estate, LLC, Case No. 15-10958 (KJC); Heald Education, LLC, Case No. 15-10964 (KJC); Heald College, LLC, Case No. 15-10969 (KJC); Quickstart Intelligence Corporation, Case No. 15-10973 (KJC); and Socle Education, Inc., Case No. 15-10976 (KJC).

² As defined in section II(A)(140) of the Third Amended and Modified Combined Disclosure Statement and Chapter 11 Plan of Liquidation (the “Plan”), the term “Student” means any individual who has matriculated with any of the Debtors’ schools whether in person or online.

copies at no cost. However, if locating and scanning the documents becomes cost-prohibitive, the Student Trust may decide to modify or withdraw this option. **If you are a Student and you would like the Student Trust to attempt to locate and preserve all Student Records related to you, then you must send a written request to Lorie Ball at 2049 Century Park East, Suite 3400, Los Angeles, California 90067, Facsimile: (310) 229-5800, lball@robinskaplan.com so that the request is received no later than January 23, 2017;**

- c) For any non-Student that requests Student Records that are in the possession of the Student Trust, the non-Student making such request (the “Non-Student Party”) must identify the Student(s) for which the Non-Student Party seeks records, and provide the Student Trust with either: (i) the consent of the Student to turn over the Student Records; or (ii) a Court order granting the Non-Student Party with access to the requested Student Records. The Non-Student Party must post a deposit and will be required to pay all costs and fees associated with such efforts, as set forth in the Motion; and
- d) All Student Records that are scanned or not requested will be destroyed.

A HEARING ON THE MOTION WILL BE HELD ON NOVEMBER 15, 2016 AT 2:00 P.M., (PREVAILING EASTERN TIME), BEFORE THE HONORABLE KEVIN J. CAREY, UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 NORTH MARKET STREET, 5TH FLOOR, COURTROOM 5, WILMINGTON, DELAWARE 19801.

YOUR RIGHTS MAY BE AFFECTED BY THIS MOTION. PLEASE TAKE NOTICE that any response to this Motion must be filed with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, Delaware 19801 **on or before November 7, 2016 at 4:00 pm (ET)** (the “Response Deadline”). At the same time, you must also serve a copy of the response upon counsel for the Student Trust no later than the Response Deadline of November 7, 2016 at the following addresses:

ROBINS KAPLAN LLP Scott F. Gautier, Esq. Lorie A. Ball, Esq. 2049 Century Park East, Suite 3400 Los Angeles, California 90067 Telephone: (310) 552-0130 Facsimile: (310) 229-5800 sgautier@robinskaplan.com lball@robinskaplan.com	POLSINELLI PC Christopher A. Ward (Del. Bar No. 3877) Shanti M. Katona (Del. Bar No. 5352) 222 Delaware Avenue, Suite 1101 Wilmington, Delaware 19801 Telephone: (302) 252-0920 Facsimile: (302) 252-0921 skatona@polsinelli.com
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IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF SOUGHT IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

A copy of the Motion and information on how to obtain transcripts, useful links related to student debt cancellation, and updates on the Bankruptcy Case and efforts of the CCI Student Creditor Trust may be found on the CCI Student Creditor Trust WebPage at: <https://www.donlinrecano.com/Clients/cci/Index>. You may also contact Lorie A. Ball at the contact information listed above for a copy of the Motion.

Dated: October 18, 2016
Wilmington, Delaware

POLSINELLI PC
Shanti M. Katona

ROBINS KAPLAN LLP
Scott F. Gautier

Attorneys for CCI Student Creditors Trust