

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:

MIDWEST CHRISTIAN VILLAGES, INC.
et al.,¹

Debtors.

Chapter 11

Case No. 24-42473-659
(Joint Administration Requested)

Hearing Date: July 17, 2024
Hearing Time: 2:00 p.m. (CT)
Hearing Location: Courtroom 7-North

**NOTICE OF FILING OF CHAPTER 11 PETITIONS, FIRST DAY MOTIONS, AND
PROPOSED HEARING ON FIRST DAY MOTIONS**

PLEASE TAKE NOTICE THAT on July 16, 2024 (“Petition Date”), the above-captioned debtors and debtors-in-possession, (each a “Debtor” and, collectively, the “Debtors”) each filed a voluntary petition for relief under Chapter 11 of Title 11 of the United States Code (“Bankruptcy Code”) with the United States Bankruptcy Court for the Eastern District of Missouri (“Court”) commencing the above-captioned Chapter 11 cases.

PLEASE TAKE FURTHER NOTICE that, together with the Chapter 11 petitions, the Debtors also requested an expedited hearing before the Court (“First Day Hearing”) to consider

¹ The address of the Debtors headquarters is 2 Cityplace Dr, Suite 200, Saint Louis, MO 63141-7390. The last four digits of the Debtors’ federal tax identification numbers are: (i) Midwest Christian Villages, Inc. [5009], (ii) Hickory Point Christian Village, Inc. [7659], (iii) Lewis Memorial Christian Village [3104], (iv) Senior Care Pharmacy Services, LLC [1176], (v) New Horizons PACE MO, LLC [4745], (vi) Risen Son Christian Village [9738], (vii) Spring River Christian Village, Inc. [1462], (viii) Christian Homes, Inc. [1562], (ix) Crown Point Christian Village, Inc. [4614], (x) Hoosier Christian Village, Inc. [3749], (xi) Johnson Christian Village Care Center, LLC [8262], (xii) River Birch Christian Village, LLC [7232], (xiii) Washington Village Estates, LLC [9088], (xiv) Christian Horizons Living LLC [4871], (xv) Wabash Christian Therapy and Medical Clinic, LLC [2894], (xvi) Wabash Christian Village Apartments, LLC [8352], (xvii) Wabash Estates, LLC [8743], (xviii) Safe Haven Hospice, LLC [6886], (xix) Heartland Christian Village, LLC [0196], (xx) Midwest Senior Ministries, Inc. [3401] and (xxi) Shawnee Christian Nursing Center, LLC [0068].



certain motions (collectively, “First Day Motions”) filed on the Petition Date and listed on **Exhibit A** hereto.

PLEASE TAKE FURTHER NOTICE that, the Court has scheduled the First Day Hearing to commence on **July 17, 2024 at 2:00 P.M. (prevailing Central Time)** in Courtroom 7 North of the Thomas F. Eagleton United States Courthouse, 111 South Tenth Street, St. Louis, Missouri. Any objections to the First Day Motions shall be filed with the Court and served on Debtors’ counsel, counsel to UMB Bank, N.A.: Mintz, Levin, Cohn, Ferris, Glovsky and Popeo, P.C., Attention: Daniel Bleck and Aaron Williams, One Financial Center, Boston, MA 02111, and the United States Trustee by **July 17, 2024 at 2:00 P.M. (prevailing Central Time)**.

PLEASE TAKE FURTHER NOTICE that, a copy of each of the First Day Motions may be obtained: (i) by accessing the Court’s website at <https://ecf.moeb.uscourts.gov> through an account obtained from the Pacer Service Center at 1-800-676-6856 or www.pacer.gov or (ii) by requesting a copy from Debtors’ counsel listed below.

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the First Day Motions carefully and discuss them with your attorney, if you have one in the chapter 11 cases. (If you do not have an attorney, you may wish to consult one).

PLEASE TAKE FURTHER NOTICE that if you do not want the Court to grant the relief requested in the First Day Motions, or if you want the Court to consider your views on the First Day Motions, then you or your attorney must attend the First Day Hearing. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the First Day Motions and may enter orders granting the relief requested in the First Day Motions.

Dated: July 16, 2024
St. Louis, Missouri

Respectfully submitted,

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/s/ Stephen O'Brien

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Debtors-in-Possession*

EXHIBIT A

First Day Motions

1. *Debtors' Motion Requesting Joint Administration of Chapter 11 Cases* [Docket No. 14].
2. *Motion of the Debtors for Order (I) Extending the Time to File Schedules and Statements; (II) Waiving the Requirements to File Equity Lists and Provide Notice to Equity Security Holders; (III) Authorizing the Debtors to File a Consolidated List of the Debtors Thirty (30) Largest Unsecured Creditors; (IV) Authorizing the Debtors to File a Consolidated and Redacted Creditor Matrix; and (V) Approving the Manner and Service of Notice of Case Commencement* [Docket No. 18].
3. *Debtors' Motion for Interim and Final Orders (I) Authorizing, but not Directing, Debtors to (A) Pay Prepetition Wages, Salaries, Employee Benefits, and other Obligations, (B) Maintain Employee Benefit Programs, and (C) Pay Related Administrative Obligations; and (II) Granting Related Relief* [Docket No. 4].
4. *Motion for Entry of Interim and Final Orders Authorizing Debtors to: (1) Continue Using Existing Cash Management System, Bank Accounts, and Business Forms; (2) Implement Changes to the Cash Management System in the Ordinary Course of Business; (3) Continue Intercompany Transactions; (4) Provide Administrative Expense Priority for Postpetition Intercompany Claims; and (5) Obtain Related Relief* [Docket No. 10].
5. *Debtors' Motion for Entry of Interim and Final Orders (I) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Services; (II) Determining Adequate Assurance of Payment for Future Utility Services; (III) Establishing Procedures for Determining Adequate Assurance of Payment; and (IV) Granting Related Relief* [Docket No. 5].
6. *Debtors' Motion for Entry of Order (I) Authorizing the Debtors to Continue (A) Insurance Programs and (B) Prepetition Surety Bonds, and Pay Obligations Arising Thereunder; and (II) Preventing Insurance Companies from Enforcing Ipso Facto Clauses or Giving Any Notice of Termination or Otherwise Modifying Any Insurance Policy Without Obtaining Relief from the Automatic Stay* [Docket No. 6].
7. *Debtors' Motion for Entry of Interim and Final Orders Authorizing (I) Payment of Certain Prepetition Claims of Critical Vendors; (II) Payment of 503(b)(9) Claims to Certain Critical Vendors; and (III) Financial Institutions to Honor and Process Related Checks and Transfers* [Docket No. 7].
8. *Debtors' Motion for Entry of an Order (I) Authorizing the Filing Under Seal of Confidential Patient Information and (II) Granting Related Relief* [Docket No. 9].
9. *Debtors' Motion for Interim and Final Orders (1) Authorizing the Debtors To Obtain Post-Petition Financing, (2) Authorizing Debtors In Possession to Use Cash Collateral, (3)*

Providing Adequate Protection, (4) Granting Liens, Security Interests and Superpriority Claims, and (5) Scheduling a Final Hearing [Docket No. 11].

10. *Debtors' Application Pursuant to 11 U.S.C. §§ 105(a) and 363(b) to (I) Retain Healthcare Management Partners, LLC to Provide the Debtors a Chief Restructuring Officer, Restructuring Officers and Certain Additional personnel and (II) Designate Shawn O'Conner as Chief Restructuring Officer and Scott Phillips and Zach Rowe as Restructuring Officers for the Debtors, Effective as of the Petition Date [to be filed].*
11. *Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Dentons US LLP as Attorneys for the Debtors and Debtors in Possession, Effective as of the Petition Date [to be filed].*
12. *Debtors' Application for Authority to Employ Summers Compton Wells LLC as Local Counsel for the Debtors [Docket No. 19].*
13. *Debtors' Application for Entry of an Order Authorizing the Retention and Employment of B.C. Ziegler and Company as Financial Advisor to the Debtors and Debtors in Possession, Effective as of the Petition Date [to be filed].*
14. *Debtors' Application for Appointment of Kurtzman Carson Consultants, LLC d/b/a/ Verita Global as Claims and Noticing Agent and Administrative Advisor, Effective as of the Petition Date [Docket No. 20].*