

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

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|   |   |                                  |
|---|---|----------------------------------|
| In re:                                  | § | Chapter 11                       |
|   | § |                                  |
| Midwest Christian Villages, Inc., d/b/a | § |                                  |
| Christian Horizons,                     | § | Case No. 24- 47473-659           |
|   | § |                                  |
| Debtor.                                 | § |                                  |
|   | § | (Joint Administration Requested) |
| Tax I.D. No. 26-0275009                 | § |                                  |

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| In re:                                       | § | Chapter 11                       |
|  | § |                                  |
| Hickory Point Christian Village, Inc., d/b/a | § |                                  |
| Hickory Point Christian Village f/k/a Fair   | § | Case No. 24- 47474-659           |
| Havens Hickory Point Christian Village,      | § |                                  |
|  | § | (Joint Administration Requested) |
| Debtor.                                      | § |                                  |
|  | § |                                  |
| Tax I.D. 31-1114614                          | § |                                  |

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| In re:                            | § | Chapter 11                       |
|                                   | § |                                  |
|                                   | § |                                  |
| Lewis Memorial Christian Village, | § |                                  |
|                                   | § | Case No. 24-47475-659            |
| Debtor.                           | § |                                  |
|                                   | § |                                  |
| Tax I.D. 51-0173104               | § | (Joint Administration Requested) |

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| In re:                                      | § | Chapter 11                       |
|   | § |                                  |
| Senior Care Pharmacy Services, LLC,         | § | Case No. 24-47476-659            |
|   | § |                                  |
| Debtor.                                     | § |                                  |
|   | § | (Joint Administration Requested) |
| Tax I.D. 30-0971176                         | § |                                  |
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| In re:                                      | § | Chapter 11                       |
|   | § |                                  |
| New Horizons PACE MO, LLC,                  | § | Case No. 24-47477-659            |
|   | § |                                  |
| Debtor.                                     | § |                                  |
|   | § | (Joint Administration Requested) |
| Tax I.D. 88-2494745                         | § |                                  |
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| In re:                                      | § | Chapter 11                       |
|   | § |                                  |
| Risen Son Christian Village,                | § | Case No. 24-47478-659            |
|   | § |                                  |
| Debtor.                                     | § |                                  |
|   | § | (Joint Administration Requested) |
| Tax I.D. 42-1279738                         | § |                                  |
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| In re:                                      | § | Chapter 11                       |
|   | § |                                  |
| Spring River Christian Village, Inc.,       | § | Case No. 24-47479                |
|   | § |                                  |
| Debtor.                                     | § |                                  |
|   | § | (Joint Administration Requested) |
| Tax I.D. 43-1341462                         | § |                                  |
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| In re:                                      | § | Chapter 11                       |
|   | § |                                  |
| Christian Homes, Inc., d/b/a The Christian  | § | Case No. 24-47480-659            |
| Village, d/b/a Washington Christian Village | § |                                  |
| and d/b/a Wabash Christian Village,         | § |                                  |
|   | § | (Joint Administration Requested) |
| Debtor.                                     | § |                                  |
|   | § |                                  |
| Tax I.D. 37-0841562                         | § |                                  |

In re:

Crown Point Christian Village, Inc., f/k/a  
Chicago land Christian Village, Inc.,

Debtor.

Tax I.D. 31-1114614

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Chapter 11

Case No. 24-47481-659

(Joint Administration Requested)

In re:

Hoosier Christian Village, Inc., d/b/a Hoosier  
Christian Village

Debtor.

Tax I.D. 23-7423749

§  
§  
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Chapter 11

Case No. 24-47482-659

(Joint Administration Requested)

In re:

Johnson Christian Village Care Center, LLC  
d/b/a Johnson Christian Village,

Debtor.

Tax I.D. 47-1908262

§  
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Chapter 11

Case No. 24-47483

(Joint Administration Requested)

In re:

River Birch Christian Village, LLC d/b/a River  
Birch Living d.b.a. The Ambrose at Panther  
Creek,

Debtor.

Tax I.D. 84-3647232

§  
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Chapter 11

Case No. 24-47484-659

(Joint Administration Requested)

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| In re:   | § | Chapter 11                       |
|  | § |                                  |
| Washington Village Estates, LLC,               | § | Case No. 24-47485-659            |
|  | § |                                  |
| Debtor.  | § |                                  |
| Tax I.D. 20-5108606                            | § | (Joint Administration Requested) |
|  | § |                                  |
| In re:   | § | Chapter 11                       |
|  | § |                                  |
| Christian Horizons Living, LLC f/k/a Christian | § | Case No. 24-47486-659            |
| Horizons Living LLC,                           | § |                                  |
|  | § |                                  |
| Debtor.  | § |                                  |
| Tax I.D. 84-3634871                            | § | (Joint Administration Requested) |
|  | § |                                  |
| In re:   | § | Chapter 11                       |
|  | § |                                  |
| Wabash Christian Therapy And Medical Clinic,   | § | Case No. 24-47487-659            |
| LLC d/b/a Wabash Christian Therapy,            | § |                                  |
|  | § |                                  |
| Debtor.  | § |                                  |
| Tax I.D. 38-3922894                            | § | (Joint Administration Requested) |
|  | § |                                  |
| In re:   | § | Chapter 11                       |
|  | § |                                  |
| Wabash Christian Village Apartments, LLC,      | § | Case No. 24-47488-659            |
|  | § |                                  |
| Debtor.  | § |                                  |
| Tax I.D. 88-2668352                            | § | (Joint Administration Requested) |
|  | § |                                  |
| In re:   | § | Chapter 11                       |
|  | § |                                  |
| Wabash Estates, LLC,                           | § | Case No. 24-47489-659            |
|  | § |                                  |
| Debtor.  | § |                                  |
| Tax I.D. 20-5108743                            | § | (Joint Administration Requested) |
|  | § |                                  |

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| In re:                                       | § | Chapter 11                          |
|  | § |                                     |
| Safe Haven Hospice of Southern Illinois LLC, | § | Case No. 24-47490-659               |
| Debtor.                                      | § |                                     |
| Tax I.D. 32-0487209                          | § | (Joint Administration Requested)    |
|  | § |                                     |
| In re:                                       | § | Chapter 11                          |
|  | § |                                     |
| Heartland Christian Village, LLC,            | § |                                     |
| Debtor.                                      | § | Case No. 24-47491-659               |
| Tax I.D. 20-5130196                          | § | (Joint Administration Requested)    |
|  | § |                                     |
| In re:                                       | § | Chapter 11                          |
|  | § |                                     |
| Midwest Senior Ministries, Inc.,             | § | Case No. 24-47492-659               |
| Debtor.                                      | § |                                     |
| Tax I.D. 20-1053401                          | § | (Joint Administration Requested)    |
|  | § |                                     |
| In re:                                       | § | Chapter 11                          |
|  | § |                                     |
| Shawnee Christian Nursing Center, LLC d/b/a  | § |                                     |
| Shawnee Christian Village,                   | § | Case No. 24-47493-659               |
| Debtor.                                      | § | (Joint Administration Requested)    |
| Tax I.D. 20-5130068                          | § |                                     |
|  | § | Hearing Date: July 17, 2024         |
|  | § | Hearing Time: 2:00 p.m. (CT)        |
|  | § | Hearing Location: Courtroom 7 North |

**MOTION OF DEBTORS FOR ENTRY OF AN ORDER  
DIRECTING JOINT ADMINISTRATION OF CHAPTER 11 CASES**

The above-captioned debtors and debtors-in-possession (the “**Debtors**”), by and through their proposed counsel, submit this motion (the “**Joint Administration Motion**”), respectfully represent as follows:

### **Background**

1. On July 16, 2024 (the “**Petition Date**”), the Debtors each commenced with this Court a voluntary case under title 11 of the United States Code (the “**Bankruptcy Code**”). The Debtors are authorized to continue to operate their business and manage their properties as debtors in possession pursuant to §§ 1107(a) and 1108 of the Bankruptcy Code. No trustee, examiner, or statutory committee of creditors has been appointed in these chapter 11 cases.

2. Simultaneously with the filing of this motion, the Debtors filed *the Declaration of Kathleen (Kate) Bertram in Support of the Debtors’ Chapter 11 Petitions and First Day Motions* (the “**First Day Declaration**”).<sup>1</sup> As described in more detail in the First Day Declaration, the Debtors operate a mix of independent, assisted and supportive living skilled nursing campuses in 10 locations across the Midwest serving over 1,000 residents. It also serves residents via its institutional pharmacy provider, Senior Care Pharmacy Services.

3. Additional information regarding the Debtors’ business and capital structure and the circumstances leading to the commencement of these chapter 11 cases is set forth in the First Day Declaration, which has been filed with the Court contemporaneously herewith and is incorporated by reference herein.

### **Jurisdiction**

4. The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b). Venue is proper before the Court pursuant to 28 U.S.C. §§ 1408 and 1409.

### **Relief Requested**

5. By this Motion, the Debtors seek entry of an order, pursuant to §§ 105(a) and 342(c)(1) of the Bankruptcy Code, Rule 1015(b) of the Federal Rules of Bankruptcy Procedure

<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the first Day Declaration.

(the “**Bankruptcy Rules**”) and Rule 1015(b) of the Local Rules of Bankruptcy Procedure of the United States Bankruptcy Court for the Eastern District of Missouri (the “**Local Rules**”), for authority for joint administration of their chapter 11 cases for procedural purposes only. In addition, the Debtors respectfully request that the Court maintain one file and one docket for all of the jointly administered cases under the same number assigned to Midwest Christian Villages, Inc. d/b/a Christian Horizons, and that these chapter 11 cases be jointly administered under the following consolidated caption:

*[Intentionally left blank]*

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

|   |   |                               |
|---|---|-------------------------------|
| <b>In re:</b>                           | § | <b>Chapter 11</b>             |
|   | § |                               |
| <b>MIDWEST CHRISTIAN VILLAGES, INC.</b> | § | <b>Case No. 24- 47473-659</b> |
| <b><i>et al,</i><sup>1</sup></b>        | § |                               |
|   | § |                               |
| <b>Debtors.</b>                         | § | <b>(Jointly Administered)</b> |
|   | § |                               |
|   | § |                               |
|   | § |                               |

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6. Specifically, the Debtors request that the Court order the use of the foregoing caption, which designates as the Lead Case Midwest Christian Villages, Inc., *et al*, the petition filed by the Debtors to initiate these cases. The foregoing caption satisfies the requirements set forth in § 342(c)(1) of the Bankruptcy Code, and is further authorized by Local Rule 1015(b)(1) which provides that “[u]nless otherwise stated in the order granting joint administration, when multiple affiliated cases are filed, the first case filed ... shall be designated as the lead case.” (emphasis added).

7. The Debtors also seek this Court’s direction that a notation substantially similar to the following be entered on the docket in each of the above-captioned cases (except the chapter 11 case of Midwest Christian Villages, Inc., *et. al*,) to reflect the joint administration of these cases:

<sup>1</sup> 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].



“An order has been entered in this case directing the procedural consolidation and joint administration of the chapter 11 cases of Midwest Christian Villages, Inc *et al*, The docket in Case No. 24-47473-659 should be consulted for all matters affecting this case.”

8. The Debtors reserve all rights to file a subsequent motion seeking authority to jointly administer their cases with additional cases if the circumstances warrant doing so.

**Relief Requested Should Be Granted**

9. As set forth in the First Day Declaration, the Debtors operate a mix of independent, assisted and supportive living skilled nursing campuses in 10 locations across the Midwest serving over 1,000 residents. It also serves residents via its institutional pharmacy provider. As a result, many of the motions, hearings, and orders in these cases will affect each and every Debtor. Joint administration of these chapter 11 cases therefore will reduce fees and costs by avoiding duplicative filings, objections, notices, and hearings. Joint administration will also allow the United States Trustee for the Eastern District of Missouri and all other parties in interest to monitor these chapter 11 cases with greater ease and efficiency.

10. Under § 105(a) of the Bankruptcy Code, “[t]he court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title.” 11 U.S.C. §105(a). Bankruptcy Rule 1015(b) provides, in relevant part, that if “two or more petitions are pending in the same court by or against ... a debtor and an affiliate, the court may order a joint administration of the estates.” Fed. R. Bankr. P. 1015(b). As set forth in the First Day Declaration, the Debtors in these chapter 11 cases are “affiliates” as that term is defined in § 101(d) of the Bankruptcy Code.

11. In addition, Local Rule 1015(b) provides, in relevant part, as follows:

The debtor or a party in interest may request by motion that cases in this Court regarding a debtor and its affiliate(s) be jointly administered. A motion for joint administration shall be filed as early in the case as possible.

E.D. Mo. Bankr. L.R. 1015(b).

12. Joint administration will not adversely affect the Debtors' respective constituencies because this Motion requests only administrative—and not substantive—consolidation of the Debtors' estates. For example, any creditor may still file a claim against a particular Debtor or its estate (or against multiple Debtors and their respective estates) and intercompany claims among the Debtors will not be affected by joint administration.

13. For the foregoing reasons, joint administration of these chapter 11 cases is necessary, appropriate, and in the best interests of the Debtors, their estates, and all other parties in interest in these cases. Accordingly, the Court should authorize the Debtors jointly administer these chapter 11 cases.

#### **Notice**

14. This Joint Administration Motion and notice of the Joint Administration Motion will be served respectively on Master Service List No. 1 (dated July 16, 2024) and Master Notice List No. 1 (dated July 16, 2024). Notice of this Motion and any order entered hereon will be served in accordance with Local Rule 9013-3(A)(1). The Debtors submit that, under the circumstances, no other or further notice is required.

#### **No Previous Request**

15. No previous request for the relief sought herein has been made by the Debtors to this or any other court.

**Conclusion**

The Debtors request entry of an Order granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

Dated: July 16, 2024  
St. Louis, Missouri

Respectfully submitted,

**DENTONS US LLP**

/s/ Stephen O'Brien

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and Debtors-in-Possession*