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

In re:	§	Chapter 11
	§	
MIDWEST CHRISTIAN VILLAGES,	§	Case No. 24-42473-659
INC. et al, <sup>1</sup>	§	
	§	Jointly Administered
Debtors.	§	
	§	Related Docket Nos. 13, 159, 393
	§	

## **NOTICE OF HEARING ON FREE AND CLEAR SALES OF ASSETS**

**PLEASE TAKE NOTICE THAT** that on July 16, 2024 the Debtors filed the *Motion For The Entry Of: (A) An Order: (1) Approving Auction Sale Format And Bidding Procedures; (2) Approving Process For Discretionary Selection Of Stalking Horse Bidder And Bid Protections; (3) Approving Form Of Notice To Be Provided To Interested Parties; (4) Scheduling A Court Hearing To Consider Approval Of The Sale To The Highest And Best Bidder; And (5) Approving Procedures Related To The Assumption Of Certain Executory Contracts And Unexpired Leases; And (B) An Order Authorizing The Sale Of Property Free And Clear Of All Claims, Liens And Encumbrances* (the "<u>Sale Motion</u>")<sup>2</sup> [Docket No. 13], which the Court granted on a final basis [Docket No. 159] (the "<u>Bid and Sale Procedures Order</u>").

**PLEASE TAKE FURTHER NOTICE** that certain Stalking Horse Bids to <u>acquire</u> <u>certain assets of the Debtors free and clear of claims, liens, encumbrances and interests</u> pursuant to Section 363 and 365 of the United States Bankruptcy Code have been received, and the Debtors filed a notice of the Stalking Horse Bidders with the Court [Docket No. 393] pursuant the Bid and Sale Procedures Order, which bids are subject to higher and better bids.

 $<sup>^2</sup>$  Capitalized terms used but not otherwise defined herein have the meanings given to them in the Sale Motion and the Bid and Sale Procedures Order.



<sup>&</sup>lt;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], (xxi) Shawnee Christian Nursing Center, LLC [0068], and (xxii) Safe Haven Hospice, LLC [6886].

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PLEASE TAKE FURTHER NOTICE that a hearing to approve the <u>free and clear</u> sales to the Stalking Horse Bidders or any higher and better bids will be held on <u>November</u> <u>15, 2024 at 2:00 p.m. C.T.</u> (the "<u>Sale Hearing</u>") at Thomas F. Eagleton U.S. Courthouse, 111 South 10th St., 7th Floor, North, St. Louis, MO 63102 (the "<u>Bankruptcy Court</u>").

**PLEASE TAKE FURTHER NOTICE** that any objections to the relief requested (a sale of the Debtors' assets free and clear of all liens claims and encumbrances) must be in writing, must be filed with the Clerk of the Bankruptcy Court and served on the Debtors, the Committee, the Bond Trustee, the HUD Related Parties, the U.S. Trustee, the Master Notice List, any Winning Bidder(s) announced by the Debtors at the time of the filing of the objection and any party requesting notifications of filings in this case no later than <u>November 13, 2024</u> at 3:00 p.m. C.T.

Copies of any of the Asset Purchase Agreements, the pleadings referenced above or the proposed form of sale order are available at https://www.veritaglobal.net/mcv or upon request to the undersigned counsel for the Debtors. For questions, parties can also contact Verita Global (the Debtors' Claims Agent) at (888) 830-4644 (U.S./Canada) or (310) 751-2640 (International).

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Dated: October 16, 2024 St. Louis, Missouri

Respectfully submitted,

DENTONS US LLP /s/ Stephen O'Brien

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