

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

In re:) In Proceedings Under Chapter 11
)
MIDWEST CHRISTIAN VILLAGES, INC.,) Case No. 24-42473-659
et al.,¹) Jointly Administered
Debtors.) Honorable Kathy Surratt-States,
)
)

**SUPPLEMENTAL DISCLOSURE AND DECLARATION OF SUMMERS COMPTON
WELLS LLC AS LOCAL COUNSEL FOR THE DEBTORS**

On July 16, 2024, the above-captioned debtors and debtors-in-possession (the “Debtors”), by and through their counsel, submitted their motion for authority to employ the firm of Summers Compton Wells LLC (“SCW”) as their local bankruptcy counsel (the “**Employment Application**”) (Docket No. 19). The Final Order Approving the Employment Application was entered on August 16, 2024 (Docket No. 150). SCW hereby supplements the Employment Application in accordance with Rule 2014 of the Federal Rules of Bankruptcy Procedure as follows with respect to its connections with the Debtors’ creditors and other parties in interest:

1. On August 8, 2024, the United States Trustee established an Official Committee of Unsecured Creditors (the Committee) (Docket No. 121).

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]; (xxi) Shawnee Christian Nursing Center, LLC [0068]; and (xxii) Safe Haven Hospice, LLC [6886].



2. On August 30, 2024, the Committee filed its Motion to Employ Schmidt Basch, LLC (“Schmidt Basch”) as local counsel for the Committee (Docket No. 236). The Order approving the employment of Schmidt Basch was entered on September 16, 2024 (Docket No. 311).

3. Among the partners of Schmidt Basch was Andrew R. Magdy (“Mr. Magdy”).

4. On or shortly after January 17, 2025, Mr. Magdy is joining SCW as being “of counsel”.

5. Andrew R. Magdy has advised SCW that his involvement with this case was limited to reviewing and editing pleadings drafted by the Committee to ensure compliance with local rules and occasional court appearances. He has indicated he has no direct communications with the Committee; he has not been involved in any strategic or substantive discussions concerning the case; and he does not believe he had access to any confidential information. Further, Mr. Magdy is withdrawing as local counsel for the Committee, which will continue to be represented by Schmidt Basch as local counsel.

6. SCW has taken the following steps to screen Mr. Magdy from this matter.

a. SCW tries to keep only an electronic case file for this matter. However, to the extent that it is necessary to keep hard copies of documents, those documents are kept in the undersigned’s office.

b. SCW uses an electronic document retention system, in which all documents and e-mails are stored. The undersigned confirmed with his information technology staff that Mr. Magdy’s access to any electronic information (including documents and e-mails) has been or will be removed. Mr. Magdy does not have the ability to access this information.

c. The undersigned or any employee and/or attorney of SCW shall not discuss this matter with Mr. Magdy.

d. Mr. Magdy shall not discuss this matter with anyone at SCW.

e. The undersigned believes that these steps effectively screen Mr. Magdy from any access to or information regarding this matter but welcomes any additional measures that the Court deems necessary and appropriate.

7. It is the undersigned's understanding that the Committee does not have an issue with Mr. Magdy's change of employment, nor does lead counsel for the Debtors as well as counsel for the bondholders. The undersigned further disclosed Mr. Magdy's employment to the US Trustee.

Pursuant to 28 U.S.C. § 1746, the undersigned declares under penalty of perjury that the foregoing is true and correct to the best of his knowledge, information and belief.

/s/ David A. Sosne
David A. Sosne

Respectfully submitted,

/s/ David A. Sosne
David A. Sosne #28365MO
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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was filed electronically on January 16, 2025 with the United States Bankruptcy Court for the Eastern District of Missouri and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

/s/ Christina Hauck
Christina Hauck