

**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
)
)
) Hearing Date: February 25, 2025
) Hearing Time: 10:00 a.m. (CST)
) Objection Deadline: February 18, 2025

**APPLICATION FOR APPROVAL OF STIPULATION AND CONSENT ORDER
GRANTING RELIEF FROM THE AUTOMATIC STAY AND NOTICE OF HEARING**

PLEASE TAKE NOTICE THAT a hearing on the approval of the *Stipulation and Consent Order Granting Relief from the Automatic Stay* is scheduled for **February 25, 2025 at 10:00 a.m. (Central Standard Time)** in Courtroom 7 North, of the Thomas F. Eagleton United States Courthouse, 111 South Tenth Street, St. Louis, Missouri. At the hearing, Debtors will be requesting entry of the Stipulation and Agreed Order between Safe Haven Hospice, LLC and Jennifer L. Dixon (“Stipulation and Agreed Order”), a copy of which is attached as Exhibit “A”.

Creditors and parties-in-interest who wish to participate at the hearing and appear telephonically or by Webex, as may be permitted by the Court, should contact the Courtroom Deputy, John Howley, at 314-244-4808 or by email at John.Howley@moeb.uscourts.gov.

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].

ANY OBJECTIONS OR EXCEPTIONS TO ENTRY OF THE STIPULATION AND AGREED ORDER MUST BE FILED PER THE ELECTRONIC CASE FILING REQUIREMENTS OF THE COURT ON OR BEFORE FEBRUARY 18, 2025.

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Stipulation and Agreed Order carefully and discuss it 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 Stipulation and Agreed Order, or if you want the Court to consider your views thereon, then you or your attorney must attend the hearing. If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought and may enter an order granting the relief requested in the Stipulation and Agreed Order.

Dated: February 3, 2025

Respectfully submitted,

/s/ David A. Sosne

David A. Sosne MoBar # 28365

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EXHIBIT "A"

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

In re:)	Chapter 11
)	
MIDWEST CHRISTIAN VILLAGES, INC.,)	Case No. 24-42473-659
<i>et al.</i> ,)	Jointly Administered
Debtors.)	

**STIPULATION AND CONSENT ORDER
GRANTING RELIEF FROM THE AUTOMATIC STAY**

Upon the stipulation (the “Stipulation”) of Safe Haven Hospice, LLC (“Debtor”) and Jennifer L. Dixon (“Dixon”) by and through their respective counsel, hereby enter into this Stipulation and represent, agree, and request this Court to so Order as follows:

A. On July 16, 2024, Midwest Christian Villages, Inc., *et al*, and its affiliated debtors in the above-captioned chapter 11 cases, as debtors and debtors in possession (collectively, the “Debtors”) each commenced with this Court a voluntary case under title 11 of the United States Code which is pending. On July 19, 2024, the Court entered its Order Directing Joint Administration of Chapter 11 Cases [Dkt. 59]. Debtor Safe Haven Hospice, LLC (“Safe Haven”) is one of the Debtors.

B. On August 16, 2024, without knowledge of the bankruptcy case, Dixon filed a Worker’s Compensation Claim against Debtor Safe Haven with the Illinois Worker’s Compensation Commission bearing case number 24WC022743 (the “Worker’s Compensation Claim”) asserting job related injuries arising from an accident of April 24, 2023, in which Dixon sustained injuries to her right foot and right leg.

D. On October 15, 2024, Dixon filed a Proof of Claim 2 in Case 24-43000 against Safe Haven in the amount of “Unknown” on account of the Worker’s Compensation Claim.

E. The Worker’s Compensation insurance carrier, United Heartland Insurance, has

extended an offer to resolve the pending Worker's Compensation Claim, and Dixon requests relief from the automatic stay to negotiate or otherwise resolve her Worker's Compensation Claim exclusively with the insurance carrier.

F. The Parties have agreed, subject to approval of the Court, to this Stipulation, subject to the terms and conditions set forth below.

IT IS HEREBY ORDERED, STIPULATED, AND ADJUDGED AS FOLLOWS:

1. The automatic stay of 11 U.S.C. § 362(d)(1) is modified so that Dixon may seek to resolve her claim solely from insurance coverage applicable to the Claims asserted in the Worker's Compensation action.

2. This Stipulation shall be effective as of the date of the filing of the Worker's Compensation Claim effective as of August 16, 2024 upon the entry of this Stipulation.

3. Any other claim Dixon may have against Safe Haven unrelated to the Worker's Compensation Claim will only be pursued through the proof of claim and bankruptcy process.

4. Safe Haven's agreement to stay relief is with reservation of all rights it may have including its ability to contest liability or damages in any subsequent proceedings.

5. This Stipulation shall be effective immediately upon entry notwithstanding Bankruptcy Rule 4001(a)(3).

KATHY A. SURRATT-STATES
U.S. Bankruptcy Judge

/s/ David A. Sosne
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