

**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.

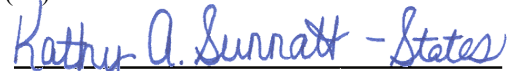
F. The Parties have agreed, subject to approval of the Court, to this Stipulation, subject



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).
6. Not later than two (2) business days after the date of this Order, the Debtors shall serve a copy of the Order and shall file a certificate of service no later than twenty-four (24) hours after service.


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

DATED: February 25, 2025
St. Louis, Missouri
jjh

/s/ David A. Sosne
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