UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

In re:

MIDWEST CHRISTIAN VILLAGES, INC. et al.,1

Debtors.

Chapter 11

Case No. 24-42473-659

(Jointly Administered)

Hearing Date: March 26, 2025 Hearing Time: 10:00 a.m. (CT)

Hearing Location: Courtroom 7 North

NOTICE OF DEBTORS' MOTION FOR ORDER UNDER 11 U.S.C. §§ 363 AND 105(a) AND FED. R. BANKR. P. 2002, 6004, 9006, AND 9019 ESTABLISHING PROCEDURES FOR REMAINING ASSET SALES

PLEASE TAKE NOTICE that this motion is scheduled for hearing on March 26, 2025 at 10:00 a.m. (prevailing Central Time), before the Honorable Kathy A. Surratt-States in Bankruptcy Courtroom 7 North, in the Thomas F. Eagleton U.S. Courthouse, 111 South Tenth Street, St. Louis, Missouri 63102.

PLEASE TAKE FURTHER NOTICE THAT Any response or objection to this motion must be filed with this court by March 19, 2025. A copy shall be promptly served upon the

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].



undersigned. Failure to file a timely response may result in the Court granting the relief requested prior to the hearing date.

Dated: March 5, 2025 St. Louis, Missouri

Respectfully submitted,

DENTONS US LLP

/s/ Stephen O'Brien
Stephen O'Brien
MoBar # 43977
DENTONS US LLP
211 N Broadway Ste 3000
St. Louis, MO 63102
Telephone: (314) 241-1800
stephen.obrien@dentons.com

Robert E. Richards (admitted *pro hac vice*) Samantha Ruben (admitted *pro hac vice*) Elysa Chew (admitted *pro hac vice*)

DENTONS US LLP

233 S. Wacker Drive, Suite 5900 Chicago, Illinois 60606-6404 Telephone: (312) 876-8000 robert.richards@dentons.com samantha.ruben@dentons.com elysa.chew@dentons.com

- and -

David A. Sosne MoBar # 28365 SUMMERS COMPTON WELLS LLC

903 South Lindbergh Blvd., Suite 200 St. Louis, Missouri 63131 Telephone: (314) 991-4999 dsosne@scw.law

Co-Counsel to the Debtors and Debtors-in-Possession