

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

IN RE:)	In Proceedings
)	Under Chapter 11
MIDWEST CHRISTIAN VILLAGES,)	
INC., et al.,)	
)	Bk. No. 24-42473
Debtor.)	Jointly Administered

**RESPONSE OF SANDRA BRYANT TO
DEBTORS' SECOND OMNIBUS OBJECTION TO CLAIMS**

SANDRA BRYANT ("Claimant"), by and through her undersigned attorneys, states as follows as and for her response to the *Debtors' Second Omnibus Objection to Claims* (the "Objection"):

1. At all relevant times, Claimant was an employee of Christian Homes, Inc., as an administrator and executive.

2. In the course of her employment, Claimant participated in a retirement plan established under 26 U.S.C. §457. Under that Plan, Claimant was to receive retirement benefits as established by her employer.

3. As of the commencement of these jointly administered cases, the balance due Claimant under the 457 plan was \$179,515.01. Claimant enrolled in the 457 on August 23, 2004.

4. Claimant filed her proof of claim in these cases on July 24, 2024, as a priority claim in the amount of \$179,515.01.

5. In the Objection, the Debtors seek to reclassify Claimant's claim as unsecured and further ask that it be allowed in the amount of \$0.00.



6. While Claimant understands the basis for reclassifying her claim, the Debtors have advanced no reason for reduction in the amount of Claimant's claim to \$0.00.

7. Even though the assets in a Section 457 plan are available to the entire body of unsecured creditors and a claim under such a plan may not be entitled to priority, there is no basis for reducing Claimant's claim. In that respect, Debtor Christian Homes, Inc., incurred its obligation to Claimant in the ordinary course of its business and financial affairs, and induced Claimant to maintain her employment, in part, on the basis of promised retirement benefits.

8. If the Court is inclined to reclassify Claimant's claim as unsecured, it should nonetheless find and determine that Claimant holds an allowed unsecured claim in the amount of \$179,515.01.

WHEREFORE, SANDRA BRYANT respectfully requests and prays that the Court enter its Order denying the Objection insofar as it affects Claimant's Claim No. 4 in the case of Debtor Christian Homes, Inc. (Case No. 24-42480), and Claimant prays for such additional relief as the Court deems appropriate.

GOLDENBERG HELLER & ANTOGNOLI, P.C.

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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing was served electronically this 19th day of March, 2025, via CM/ECF to all persons receiving notice through that system.

/s/Joel A. Kunin