

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:

MIDWEST CHRISTIAN VILLAGES, INC. *et al.*,¹

Debtors.

In Proceedings Under Chapter 11

Case No. 24-42473-659
Jointly Administered
Hon. Kathy Surratt-States

Hearing Date: Dec. 17, 2025
Hearing Time: 10:00 (CT)
Objection Deadline: Dec. 10, 2025

NOTICE OF HEARING ON CULLEN AND DYKMAN LLP'S FOURTH INTERIM APPLICATION FOR COMPENSATION AND REIMBURSEMENT OF EXPENSES

PLEASE TAKE NOTICE THAT a hearing on the *Fourth Interim Application For Allowance Of Compensation For Professional Services Rendered And Reimbursement Of Expenses Incurred By Cullen And Dykman LLP As Counsel To The Official Committee Of Unsecured Creditors Of Midwest Christian Villages Inc., Et Al. For The Period From July 1, 2025 Through And Including October 31, 2025* dated November 10, 2025 (the “**Application**”) is scheduled for December 17, 2025 at 10:00 a.m. (Central Time) in Courtroom 7 North, of the Thomas F. Eagleton United States Courthouse, 111 South Tenth Street, St. Louis, Missouri, before the Honorable Kathy Surratt-States, United States Bankruptcy Judge, United States Bankruptcy Court, Eastern District of Missouri, Eastern Division.

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 of Southern Illinois, LLC [7209], (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].



PLEASE TAKE FURTHER NOTICE THAT 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.

ANY OBJECTIONS OR EXCEPTIONS TO ENTRY OF THE ORDER GRANTING THE APPLICATION MUST BE FILED PER THE ELECTRONIC CASE FILING REQUIREMENTS OF THE COURT ON OR BEFORE DECEMBER 10, 2025.

PLEASE TAKE FURTHER NOTICE that your rights may be affected. You should read the Application 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 Application, 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 Application.

Dated: November 10, 2025

Respectfully submitted,

CULLEN AND DYKMAN LLP

By: /s/ Michael H. Traison

Michael H. Traison, Esq.

Michelle McMahon, Esq.

Kyriaki Christodoulou, Esq.

One Battery Park Plaza, 34th Floor

New York, New York 10004

mtraison@cullenllp.com

mmcmahon@cullenllp.com

kchristodoulou@cullenllp.com

Counsel to the Official Committee of

Unsecured Creditors of Midwest Christian Villages Inc., et al.

CULLEN AND DYKMAN LLP

Michael H. Traison, Esq.

Michelle McMahon, Esq.

Kyriaki Christodoulou, Esq.

One Battery Park Plaza, 34th Floor

New York, New York 10004

Tel: (212) 732-2000

mtraison@cullenllp.com

mmcmahon@cullenllp.com

kchristodoulou@cullenllp.com

*Counsel to the Official Committee of Unsecured Creditors
of Midwest Christian Villages Inc., et al.*

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

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In re: : Chapter 11
:
MIDWEST CHRISTIAN VILLAGES, INC. : Case No. 24-42473-659
:
et al.,¹ : (Jointly Administered)
:
Debtors. :
:
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FEE APPLICATION SUMMARY SHEET

**FOURTH INTERIM APPLICATION FOR ALLOWANCE OF
COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED BY CULLEN AND DYKMAN LLP AS
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF
MIDWEST CHRISTIAN VILLAGES INC., *ET AL.* FOR THE PERIOD FROM
JULY 1, 2025 THROUGH AND INCLUDING OCTOBER 31, 2025**

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 of Southern Illinois, LLC [7209], (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].

Name of Applicant:	Cullen and Dykman LLP
Authorized to Provide Professional Services as:	Counsel to the Official Committee of Unsecured Creditors of Midwest Christian Villages Inc., <i>et al.</i>
Name of Client:	The Official Committee of Unsecured Creditors of Midwest Christian Villages Inc., <i>et al.</i>
Petition Date:	July 16, 2024
Date of Retention:	September 23, 2024, effective as of August 12, 2024
Date of Order Approving Employment:	September 23, 2024
Blended Rate in this Application for all Timekeepers:	\$724.57
Period for which Compensation and Expense Reimbursement is Requested:	July 1, 2025 – October 31, 2025
Total Interim Compensation Requested:	\$39,199.00
Total Requested Expense Reimbursement	\$0.00
Number of Professionals Included in this Application:	3
Total Compensation and Expenses Previously Requested:	\$537,002.73 (excludes 80% Jul-Oct comp.)
Total Compensation and Expenses Previously Awarded:	\$537,002.73
Name, Billing Rate, and Department of Professionals Included in this Application:	See Exhibit E.
Total Hours:	54.1
This is a(n) :	<input type="checkbox"/> monthly <input checked="" type="checkbox"/> interim <input type="checkbox"/> final application

CULLEN AND DYKMAN LLP

Michael H. Traison, Esq.
Michelle McMahon, Esq.
Kyriaki Christodoulou, Esq.
One Battery Park Plaza, 34th Floor
New York, New York 10004
Tel: (212) 732-2000
mtraison@cullenllp.com
mmcmahon@cullenllp.com
kchristodoulou@cullenllp.com

*Counsel to the Official Committee of Unsecured Creditors
of Midwest Christian Villages Inc., et al.*

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

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In re: : Chapter 11
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MIDWEST CHRISTIAN VILLAGES, INC. : Case No. 24-42473-659
et al.,¹ :
: (Jointly Administered)
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Debtors. :
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**FOURTH INTERIM APPLICATION FOR ALLOWANCE OF
COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED BY CULLEN AND DYKMAN LLP AS
COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF
MIDWEST CHRISTIAN VILLAGES INC., ET AL. FOR THE PERIOD FROM
JULY 1, 2025 THROUGH AND INCLUDING OCTOBER 31, 2025**

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 of Southern Illinois, LLC [7209], (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].

Cullen and Dykman LLP (“**C&D**”), counsel to The Official Committee of Unsecured Creditors of Midwest Christian Villages Inc., *et al.* (the “**Committee**”), hereby submits this fourth interim application (the “**Fourth Interim Application**”) seeking entry of an order, substantially in the form attached hereto as **Exhibit A**, (i) granting allowance of compensation and reimbursement of actual and necessary expenses, pursuant to sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. § 101 *et seq.* (the “**Bankruptcy Code**”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rules 2016-1 and 2016-2 of the Local Bankruptcy Rules for the Eastern District of Missouri, Eastern Division (the “**Local Rules**”), and the *United States Trustee’s Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 for Attorneys in Larger Chapter 11 Cases*, effective as of November 1, 2013 (the “**U.S. Trustee Guidelines**”) for the period from July 1, 2025 through and including October 31, 2025 (the “**Compensation Period**”). In support of this Application, C&D respectfully states as follows:

Jurisdiction and Venue

1. The Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding pursuant to 28 U.S.C. § 157(b). The statutory predicates for the relief requested herein are sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and Local Rules 2016-1 and 2016-2.

Background

2. On July 16, 2024 (the “**Petition Date**”), Midwest Christian Villages Inc., *et al.*, (the “**Debtors**”) filed voluntary petitions for relief pursuant to chapter 11 of the Bankruptcy Code. This chapter 11 filing was precipitated by, among other things, the impact of COVID-19

on the Debtors' facilities, in addition to material additional costs related to employee wages, agency staffing costs, increased food and other vendor costs, and increased construction/capital expenditure costs.

3. The Court granted joint administration of the Debtors' cases on July 19, 2024. *See* Dkt. No. 59.

4. The Debtors remain in possession of their property and continue to operate and manage their businesses as debtors-in-possession pursuant to sections 1107 and 1108 of the Bankruptcy Code.

5. On August 8, 2024, the Office of the United States Trustee (the "**U.S. Trustee**") appointed the Committee (Dkt. No. 121). The Committee is currently comprised of the following members: (i) Donald H., (ii) Select Rehabilitation, LLC, (iii) Michael C. and Jacqueline B., (iv) Sentinel Technologies, Inc., and (v) Penny F.

A. Retention of C&D as Counsel to the Committee

6. On August 28, 2024, C&D filed the *Application of the Official Committee of Unsecured Creditors for Entry of an Order Pursuant to 11 U.S.C. § 1103 Authorizing and Approving the Employment and Retention of Cullen and Dykman LLP as Counsel to the Official Committee of Unsecured Creditors, Effective as of August 12, 2024* (Dkt. No. 202) (the "**Retention Application**"). On September 23, 2024, effective as of August 12, 2024, the Court approved the Retention Application and entered the *Order Pursuant to 11 U.S.C. § 1103 Authorizing and Approving the Employment and Retention of Cullen and Dykman LLP as Counsel to the Official Committee of Unsecured Creditors, Effective as of August 12, 2024* (Dkt. No. 336) (the "**Retention Order**").

7. The Retention Order authorized the Debtors to compensate and reimburse C&D in accordance with the Bankruptcy Code, Bankruptcy Rules, the Local Rules, and any other applicable order or procedures of the Court, at the ordinary and customary hourly rates charged for services of the type rendered in connection with these chapter 11 cases. The Retention Order also authorized the Debtors to reimburse C&D for its actual and necessary expenses incurred.

B. C&D's First Interim Application

8. On November 15, 2024, C&D filed its *First Interim Application for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred by Cullen and Dykman LLP as Counsel to the Official Committee of Unsecured Creditors of Midwest Christian Villages Inc., et al. for the Period from August 12, 2024 Through and Including October 31, 2024* (Dkt. No. 453) (the “**First Interim Application**”). On December 17, 2024, the Court entered an Order approving C&D's First Interim Application (Dkt. No. 525) (the “**First Interim Order**”).

9. The First Interim Order, among other things, awarded C&D compensation in the amount of \$295,684.00 for professional services rendered, and reimbursement of actual and necessary expenses incurred in connection with the services in the amount of \$2,695.05.²

C. C&D's Second Interim Application

10. On March 21, 2025, C&D filed its *Second Interim Application for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred by Cullen and Dykman LLP as Counsel to the Official Committee of Unsecured Creditors of Midwest Christian Villages Inc., et al. for the Period from November 1, 2024 Through and Including February 28, 2025* (Dkt. No. 656) (the “**Second Interim Application**”). On June 2,

² C&D submitted monthly fee statements in accordance with the Local Rules, for services rendered during the period which comprised the First Interim Application compensation period.

2025, the Court entered an Order approving C&D's Second Interim Application (Dkt. No. 738) (the "**Second Interim Order**").

11. The Second Interim Order, among other things, awarded C&D compensation in the amount of \$141,113.50 for professional services rendered, and reimbursement of actual and necessary expenses incurred in connection with the services in the amount of \$176.59.³

D. C&D's Third Interim Application

12. On August 22, 2025, C&D filed its *Third Interim Application for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred by Cullen and Dykman LLP as Counsel to the Official Committee of Unsecured Creditors of Midwest Christian Villages Inc., et al. for the Period from March 1, 2025 Through and Including June 30, 2025* (Dkt. No. 776) (the "**Third Interim Application**"). On August 20, 2025, the Court entered an Order approving C&D's Third Interim Application (Dkt. No. 805) (the "**Third Interim Order**").

13. The Third Interim Order, among other things, awarded C&D compensation in the amount of \$97,325.50 for professional services rendered, and reimbursement of actual and necessary expenses incurred in connection with the services in the amount of \$8.09.⁴

E. C&D's Monthly Fee Statements During the Compensation Period

14. Pursuant to Rule 2016-2 B of the Local Rules, C&D has submitted four (4) monthly fee statements for services rendered in the months of July 2025, August 2025, September 2025, and October 2025 (*i.e.*, the Compensation Period) (each a "**Monthly Fee Statement**", and collectively, the "**Monthly Fee Statements**"), pursuant to which C&D has

³ C&D submitted monthly fee statements in accordance with the Local Rules for services rendered during the period which comprised the Second Interim Application compensation period.

⁴ C&D submitted monthly fee statements in accordance with the Local Rules for services rendered during the period which comprised the Third Interim Application compensation period.

received 80% of its fees and 100% of its expenses incurred during those months.⁵ A summary of C&D's Monthly Fee Statements for the Compensation Period is annexed hereto as **Exhibit B**.

15. On or about August 4, 2025, C&D submitted a Monthly Fee Statement for services rendered and expenses incurred in July 2025 (the "**July Fee Statement**") to Kurtzman Carson Consultants, LLC, d/b/a Verita Global ("**Verita**") for service upon the master service list, seeking (i) interim allowance of \$17,369.00 for services rendered during the period from July 1, 2025 through and including July 31, 2025; (ii) payment of fees and expenses in accordance with the Retention Order, Bankruptcy Code, Bankruptcy Rules, and Local Rules; and (iii) reimbursement in the amount of \$0.00 for actual and necessary costs and expenses incurred by C&D in connection with such services during the Compensation Period. No objections were received with respect to the July Fee Statement.

16. On or about September 3, 2025, C&D submitted a Monthly Fee Statement for services rendered and expenses incurred in August 2025 (the "**August Fee Statement**") to Verita for service upon the master service list, seeking (i) interim allowance of \$7,939.00 for services rendered during the period from August 1, 2025 through and including August 31, 2025; (ii) payment of fees and expenses in accordance with the Retention Order, Bankruptcy Code, Bankruptcy Rules, and Local Rules; and (iii) reimbursement in the amount of \$0.00 for actual and necessary costs and expenses incurred by C&D in connection with such services during the Compensation Period. No objections were received with respect to the August Fee Statement.

17. On or about October 3, 2025, C&D submitted a Monthly Fee Statement for services rendered and expenses incurred in September 2025 (the "**September Fee Statement**")

⁵ As of the date of this Third Interim Application, payment pursuant to the June Fee Statement (defined below) has not been received. However, C&D expects that by the time the hearing on this Third Interim Application is held and the order entered approving the fees requested herein, it will have received 80% of its fees and 100% of its expenses in accordance thereto.

to Verita for service upon the master service list, seeking (i) interim allowance of \$11,188.50 for services rendered during the period from September 1, 2025 through and including September 30, 2025; (ii) payment of fees and expenses in accordance with the Retention Order, Bankruptcy Code, Bankruptcy Rules, and Local Rules; and (iii) reimbursement in the amount of \$0.00 for actual and necessary costs and expenses incurred by C&D in connection with such services during the Compensation Period. No objections were received with respect to the September Fee Statement.

18. On or about November 4, 2025, C&D submitted a Monthly Fee Statement for services rendered and expenses incurred in October 2025 (the “**October Fee Statement**”) to Verita for service upon the master service list, seeking (i) interim allowance of \$2,702.00 for services rendered during the period from October 1, 2025 through and including October 31, 2025; (ii) payment of fees and expenses in accordance with the Retention Order, Bankruptcy Code, Bankruptcy Rules, and Local Rules; and (iii) reimbursement in the amount of \$0.00 for actual and necessary costs and expenses incurred by C&D in connection with such services during the Compensation Period. No objections were received with respect to the October Fee Statement.

19. C&D now submits its Fourth Interim Application requesting interim approval and allowance of professional fees in the amount of \$39,199.00 for services rendered and reimbursement of expenses in the amount of \$0.00 incurred during this fourth Compensation Period. This is C&D’s fourth request for compensation and reimbursement of expenses in these cases. The Committee members have been provided with a copy of C&D’s Fourth Interim Application. The Committee has approved C&D’s Fourth Interim Application.

20. The amounts to be paid to C&D from any amount awarded will be reduced by payments previously received.

21. As set forth in the certification of Michael H. Traison, Esq. dated November 10, 2025, attached hereto as **Exhibit C**, this Fourth Interim Application complies with the Bankruptcy Code, the Bankruptcy Rules, the Local Rules and the U.S. Trustee Guidelines.

Summary of Services Performed By C&D During the Compensation Period

22. As more fully described herein, C&D has provided substantial legal services to the Committee during the Compensation Period. In accordance with the Local Rules, a summary of the total time expended, and amount of compensation sought by project category is attached hereto as **Exhibit D**. A listing of the name, title, practice group, and first year of bar admission, if applicable, for each professional person who rendered services to the Committee is attached hereto as **Exhibit E**. Attached hereto as **Exhibit F** is a detailed computer-generated summary of the time expended by each professional and the services rendered by C&D as counsel to the Committee in each category during the Compensation Period. Indicated below is each category and the compensation sought by C&D for services performed on the Committee's behalf:

1. Case Administration (B110)	\$ 13,847.50
2. Asset Analysis and Recovery (B120)	\$ 3,622.50
3. Asset Disposition (B130)	\$ 960.00
4. Prepare for and Attend Hearings (B135)	\$ 2,737.00
5. Meetings of & Communications with Creditor (B150)	\$ 1,817.00
6. Fee/Employment Applications (B160)	\$ 4,758.00
7. Debtor In Possession Finance Issues (B205)	\$ 9,499.00
8. Business Operations (B210)	\$ 322.00
9. Financing/Cash Collections (B230)	\$ 448.00
10. Litigation, Contested Matters, & Adversary Proceedings (B280)	\$ 316.00
11. Plan and Disclosure Statement (B320)	\$ 790.00
12. Budgeting (B330)	\$ 82.00

23. During the Compensation Period, C&D has expended a total of 54.1 hours in this matter for total requested compensation of \$39,199.00 at its usual customary hourly rates. The average blended hourly rate was \$724.57.

24. During the Compensation Period, C&D has incurred expenses totaling \$0.00. C&D does not charge for incoming faxes. Instead, C&D charges \$1.00 per page for outgoing faxes, which C&D believes covers the expenses associated with facsimile usage. Copying charges are assessed at \$.10 per copy. Reimbursement for those costs, as well as all other disbursements in this case, is sought in accordance with the applicable Local Rules.

25. C&D has set forth below a narrative of the legal services provided to the Committee in order to inform the Court of the legal services rendered to the Committee by C&D during the fourth Compensation Period. The summary of services performed by C&D is only intended to highlight the general categories of services provided by C&D on the Committee's behalf. It is not intended to set forth each and every item of professional services that C&D performed for the Committee. All of the services for which compensation is sought herein were performed for, or on behalf of, the Committee.

Category 1
Case Administration

26. Work in this category centered on overall case monitoring and administration, including reviewing and summarizing hearing outcomes and case status for the Committee; tracking and reviewing docket activity, orders, monthly operating reports, agendas, and compensation notices; coordinating hearing logistics with chambers; communicating with committee members and other stakeholders on administrative issues, bar dates, ERC-related matters, and recoveries; and following up on court orders and fee rulings.

27. In rendering services relating to this category, C&D attorneys expended 18.1 hours for requested compensation at their customary and usual hourly rates for a total of \$13,847.50.

Category 2
Asset Analysis and Recovery

28. Activities in this category focused on settlement and recovery efforts related to the Hopp Estate and remnant assets. This included negotiating settlement terms, reviewing and revising drafts, coordinating approvals with DIP counsel and the Committee, considering a remnant asset sale structure, and corresponding with financial advisors and the Committee chair regarding asset disposition strategy.

29. In rendering services relating to this category, C&D attorneys expended 4.5 hours for requested compensation at their customary and usual hourly rates for a total of \$3,622.50.

Category 3
Asset Disposition

30. Targeted work in this category focused on the remnant asset sale and related settlement matters, including correspondence with Hopp Estate counsel, consultation with the Committee and its financial advisor, review of remnant asset sale documents, and coordinating next steps to advance disposition.

31. In rendering services relating to this category, C&D attorneys expended 1.2 hours for requested compensation at their customary and usual hourly rates for a total of \$960.00.

Category 4
Preparation For/Attend Court Hearings

32. In this category, work involved substantial preparation for and attendance at omnibus and fee-related hearings. Tasks included docket and filing review, development of

presentations regarding professional fee applications, coordination with the court, and appearances at the August and September omnibus hearings.

33. In rendering services relating to this category, C&D attorneys expended 3.4 hours for requested compensation at their customary and usual hourly rates for a total of \$2,737.00.

Category 5
Meetings of & Communications with Creditor

34. In this category, C&D attorneys prepared for and conducted Committee communications and meetings regarding case posture, strategy, and alternatives, including structured dismissal considerations. Attorneys drafted and circulated status updates to the Committee and coordinated positions with Debtors' counsel.

35. In rendering services relating to this category, C&D attorneys expended 2.3 hours for requested compensation at their customary and usual hourly rates for a total of \$1,817.00.

Category 6
Fee/Employment Applications

36. In this category, C&D attorneys prepared, drafted, revised, and finalized the third interim fee application; coordinated supporting reports and exhibits; worked with local counsel on filing and proposed orders; reviewed the resulting orders; and reconciled invoices and receipts with accounting, including monthly fee statement service.

37. In rendering services relating to this category, C&D attorneys expended 9.9 hours for requested compensation at their customary and usual hourly rates for a total of \$4,758.00.

Category 7
Debtor in Possession Finance Issues

38. Work in this category involved extensive correspondence and strategy work with DIP counsel and other stakeholders on settlement implementation, claims (including Medicare-related issues), bondholder communications about potential acquisitions, exclusivity extensions,

and litigation/status developments. C&D attorneys reviewed court orders and monitored developments affecting financing and collections.

39. In rendering services relating to this category, C&D attorneys expended 11.8 hours for requested compensation at their customary and usual hourly rates for a total of \$9,499.00.

Category 8
Business Operations

40. In this category, C&D attorneys reviewed operating reports relating to the Debtor's ongoing business operations to stay apprised of financial performance and compliance.

41. In rendering services related to this category, C&D attorneys expended 0.4 hours for requested compensation at their customary and usual hourly rates for a total of \$322.00.

Category 9
Financing/Cash Collections

42. In this category, C&D attorneys addressed settlement-related correspondence, tracked cash receipts and applied payments (including holdbacks) in internal records, and coordinated service of monthly invoices.

43. In rendering services relating to this category, C&D attorneys expended 0.9 hours for requested compensation at their customary and usual hourly rates for a total of \$448.00.

Category 10
Litigation/Contested Matters and Adversary Proceedings

44. In this category, C&D attorneys reviewed and evaluated correspondence regarding potential or pending litigation, including draft complaints and motions, and coordinated on potential responses and strategy.

45. In rendering services relating to this category, C&D attorneys expended 0.4 hours for requested compensation at their customary and usual hourly rates for a total of \$316.00.

Category 11
Debtors' Plan and Disclosure Statement

46. In this category, C&D attorneys coordinated with the Committee and Debtors on plan strategy, exclusivity, and alternatives, including structured dismissal. C&D attorneys prepared Committee-facing summaries comparing plan and structured dismissal options and related bases. did not incur any time or expense in this category during the Compensation Period.

47. In rendering services relating to this category, C&D attorneys expended 1 hour for requested compensation at their customary and usual hourly rates for a total of \$790.00.

Category 12
Budgeting

48. In this category, C&D attorneys processed and recorded receipts (*e.g.*, 80% holdback payments), coordinated with accounting to ensure proper application of funds, and updated internal payment and tracking spreadsheets.

49. In rendering services relating to this category, C&D attorneys expended 0.2 hours for requested compensation at their customary and usual hourly rates for a total of \$82.00.

Summary of Application

50. C&D submits that compensation for the services rendered and reimbursement of expenses incurred as set forth in this Fourth Interim Application is reasonable based on: (i) the time and labor required; (ii) the complexity of the legal questions presented; (iii) the skill required to perform the legal services; (iv) the customary compensation for bankruptcy professionals in New York; and (v) the experience and ability of the attorneys providing services. With respect to each of these standards, C&D submits that the compensation requested is reasonable and appropriate.

Applicable Legal Standards

51. Section 330(a) of the Bankruptcy Code provides for the compensation of reasonable and necessary services rendered by professionals retained under section 327 of the Bankruptcy Code, as follows:

(1)(A) reasonable compensation for actual, necessary services rendered by the . . . attorney and by any paraprofessional person employed by any such person; and

(B) reimbursement for actual, necessary expenses.

* * *

(3) In determining the amount of reasonable compensation to be awarded to . . . a professional person, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including –

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;
- (E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and
- (F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title.

11 U.S.C. § 330(a).

52. Additionally, the Fifth Circuit elaborated on the necessary considerations in determining the award of attorneys' fees, noting that the court should consider the request in light of the following twelve (12) factors: (1) the time and labor required; (2) the novelty and

difficulty of the questions; (3) the skill requisite to perform the legal service properly; (4) the preclusion of other employment by the attorney due to acceptance of the case; (5) the customary fee; (6) whether the fee is fixed or contingent; (7) time limitations imposed by the client or the circumstances; (8) the amount involved and the results obtained; (9) the experience, reputation, and ability of the attorneys; (10) the undesirability of the case; (11) the nature and length of the professional relationship with the client; and (12) awards in similar cases. *Johnson v. Georgia Highway Express, Inc.*, 488 F.2d 715, 718-19 (5th Cir. 1974).

53. C&D respectfully submits that the hours worked by C&D's personnel were reasonable and necessary given the numerous and oftentimes complex legal issues which arose during these chapter 11 cases. Further, C&D believes that the time spent was justified by the results that have been achieved thus far.

54. The rates being charged by C&D are commensurate with, if not less than, those typically charged by other firms in this District, as well as those of other nationally recognized firms specializing in bankruptcy.

55. C&D submits that the professional services for which it seeks compensation and the expenditures for which it seeks reimbursement in this Fourth Interim Application were necessary and appropriate to assist the Committee and maximize the benefit to the creditors of the Debtors.

56. The services rendered were performed within a reasonable amount of time by professionals with the seniority and skill level commensurate with the complexity, importance, and nature of the problem, issue or task addressed. Whether reviewed individually as to each of the tasks described above or collectively as a whole, the professional services were performed expediently and efficiently to accomplish the needs of the Committee in these chapter 11 cases.

57. C&D submits that the compensation sought in this Fourth Interim Application is reasonable and necessary under the applicable standards. Approval of the compensation for professional services and reimbursement of expenses sought herein is warranted. C&D therefore respectfully requests that the Court grant the Fourth Interim Application.

Notice

58. Notice of this Fourth Interim Application has been provided in accordance with the applicable provisions of the Bankruptcy Code, Bankruptcy Rules, Local Rules, and U.S. Trustee Guidelines. C&D respectfully submits that further notice of this Fourth Interim Application is neither required nor necessary.

Conclusion

59. Through C&D's efforts, the Committee has made significant progress in these chapter 11 cases, including reviewing and examining all possible avenues to maximize recovery for creditors. C&D has worked diligently during the Compensation Period to help the Committee address an array of issues in these cases. Accordingly, C&D submits that its services have provided substantial value to the Committee, and requests that this Fourth Interim Application be approved in its entirety.

WHEREFORE, for the reasons set forth herein, C&D respectfully requests that the Court enter an Order (a) approving C&D's interim fees in the amount of **\$39,199.00** and reimbursement of expenses in the amount of **\$0.00**, in connection with this Fourth Interim Application; (b) authorizing and directing the Debtors' to remit payment of such sums to C&D within five (5) business days of entry of an order approving this Application; and (c) granting such other relief as the Court deems is just and proper.

[Signature Page Follows]

Dated: New York, New York
November 10, 2025

CULLEN AND DYKMAN LLP

By: /s/ Michael H. Traison
Michael H. Traison, Esq.
Michelle McMahon, Esq.
Kyriaki Christodoulou, Esq.
One Battery Park Plaza, 34th Floor
New York, New York 10004
Tel: (212) 732-2000
mtraison@cullenllp.com
mmcmahon@cullenllp.com
kchristodoulou@cullenllp.com

*Counsel to the Official Committee of
Unsecured Creditors of Midwest Christian
Villages Inc., et al.*

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was filed electronically on the 14th day of November, 2025, with the United States Bankruptcy Court, and has been served on the parties in interest via e-mail by the Court pursuant to CM/ECF as set out on the Notice of Electronic Filing as issued by the Court or, in the alternative, has been served by depositing a true and correct copy of the same enclosed in a postage prepaid, properly addressed envelope, in a post office official depository under the exclusive care and custody of the United States Postal Service on those parties directed by the Court on the Notice of Electronic Filing issued by the Court as required by the Federal Rules of Bankruptcy Procedure and the Local Rules of the United States Bankruptcy Court of the Eastern District of Missouri.

/s/ Laura R. Eckelkamp

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:

MIDWEST CHRISTIAN VILLAGES, INC. *et al.*,

Debtors.

Chapter 11

Case No. 24-42473-659

(Jointly Administered)

Related Docket No. 703

**ORDER APPROVING FOURTH INTERIM APPLICATION FOR ALLOWANCE OF
COMPENSATION FOR PROFESSIONAL SERVICES RENDERED AND
REIMBURSEMENT OF EXPENSES INCURRED BY CULLEN AND DYKMAN LLP
AS COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR
THE PERIOD FROM JULY 1, 2025 THROUGH OCTOBER 31, 2025**

Cullen and Dykman LLP (“C&D”), having filed its *Fourth Interim Application for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred by Cullen and Dykman LLP as Counsel to the Official Committee of Unsecured Creditors of Midwest Christian Villages Inc., et al. for the Period from July 1, 2025 Through and Including October 31, 2025* (the “**Application**”) dated November 10, 2025; and the Court having reviewed the Application; and all applicable requirements of the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules having been satisfied; and it appearing that the compensation earned and expenses incurred by C&D during the Compensation Period were actual, reasonable and necessary; and sufficient notice of the Application having been provided and no other or further notice being required; and all persons with standing having been afforded an opportunity to be heard on the Application at a hearing held to consider approval of the

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

Application; and upon all of the proceedings had before the Court and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Application is hereby **GRANTED** as set forth herein.
2. C&D is allowed, on an interim basis, compensation in the amount of \$39,199.00 for professional services rendered during the Compensation Period as counsel to the Official Committee of Unsecured Creditors of Midwest Christian Villages Inc., *et al.* (the “**Committee**”).
3. C&D is allowed the reimbursement of actual and necessary expenses incurred during the Compensation Period in connection with its services to the Committee in the amount of \$0.00.
4. The Debtors are authorized and directed to remit payment to C&D in the amount of \$39,199.00, less all amounts that the Debtors previously paid to C&D on account of such fees and expenses.
5. Any payment made or to be made pursuant to this Order, and all authorization contained herein, shall be in compliance with and subject to the Final DIP Order [Docket No. 377] and the DIP Budget attached as Exhibit 1 thereto (as may have been amended or extended from time to time).
6. This Order shall be effective immediately upon entry.
7. Not later than two (2) business days after the date of this Order, a copy of this Order shall be served and a certificate of service filed no later than twenty-four (24) hours after service.

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

Dated: _____, 2025

St. Louis, Missouri

Proposed Order submitted by:

CULLEN AND DYKMAN LLP

Michael H. Traison, Esq.
Michelle McMahon, Esq.
Kyriaki Christodoulou, Esq.
One Battery Park Plaza, 34th Floor
New York, New York 10004
mtraison@cullenllp.com
mmcmahon@cullenllp.com
kchristodoulou@cullenllp.com

Counsel to The Official Committee of Unsecured Creditors

– and –

SCHMIDT BASCH, LLC

Amanda M. Basch, Esq.
1034 S. Brentwood Blvd., Suite 1555
St. Louis, Missouri 63117
314.721.9200
www.schmidtbasch.com

Local Counsel to The Official Committee of Unsecured Creditors

Exhibit B

Summary of Monthly Fee Statements

Fourth Interim Fee Application

Date Served	Period Covered	Total Compensation and Expenses Incurred for Period Covered		Total Amount Previously Requested with Prior Monthly Fee Statement		Total Amount Paid to Date		Holdback Requested
		Fees	Expenses	Fees (80%)	Expenses (100%)	Fees	Expenses	
8/6/2025	7/1/2025-7/31/2025	\$17,369.00	\$0.00	\$13,895.60	N/A	\$13,895.60	N/A	\$3,473.90
9/4/2025	8/1/2025-8/31/2025	\$7,939.00	\$0.00	\$6,351.20	N/A	\$6,351.20	N/A	\$1,587.80
10/9/2025	9/1/2025-9/30/2025	\$11,188.50	\$0.00	\$8,950.80	N/A	\$8,950.80	N/A	\$2,237.70
11/10/2025	10/1/2025-10/31/2025	\$2,702.00	\$0.00	\$2,161.20	N/A	N/A	N/A	\$540.40
Total for Fourth Interim Fee Application		\$39,199.00	\$0.00	\$31,359.20	N/A	\$29,197.60	N/A	\$7,839.80

Summary of Any Objections to Monthly Fee Statements: None.
Compensation Sought in this Application Not Yet Paid: \$7,839.80¹

¹ This assumes payment of 80% of October's bill prior to entry of the Fourth Interim Fee Order.

Exhibit C

Traison Declaration

CULLEN AND DYKMAN LLP

Michael H. Traison, Esq.
Michelle McMahon, Esq.
Kyriaki Christodoulou, Esq.
One Battery Park Plaza, 34th Floor
New York, New York 10004
Tel: (212) 732-2000
mtraison@cullenllp.com
mmcmahon@cullenllp.com
kchristodoulou@cullenllp.com

*Counsel to the Official Committee of Unsecured Creditors
of Midwest Christian Villages Inc., et al.*

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

-----X
In re: : Chapter 11
: :
MIDWEST CHRISTIAN VILLAGES, INC. : Case No. 24-42473-659
et al.,¹ :
: (Jointly Administered)
: :
Debtors. :
: :
-----X

**CERTIFICATION IN SUPPORT OF FOURTH INTERIM APPLICATION FOR
ALLOWANCE OF COMPENSATION FOR PROFESSIONAL SERVICES RENDERED
AND REIMBURSEMENT OF EXPENSES INCURRED BY CULLEN AND DYKMAN LLP
AS COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF
MIDWEST CHRISTIAN VILLAGES INC., ET AL. FOR THE PERIOD FROM JULY 1,
2025 THROUGH AND INCLUDING OCTOBER 31, 2025**

I, Michael H. Traison, hereby certify that:

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 of Southern Illinois, LLC [7209], (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].

1. I am a partner with the applicant firm, Cullen and Dykman LLP (“**C&D**”), which serves as counsel to The Official Committee of Unsecured Creditors of Midwest Christian Villages Inc., *et al.* (the “**Committee**”) in these chapter 11 cases. As such, I am fully familiar with the facts and circumstances set forth herein.

2. I have reviewed the *Fourth Interim Application For Allowance of Compensation For Professional Services Rendered and Reimbursement of Expenses Incurred By Cullen and Dykman LLP as Counsel to the Official Committee of Unsecured Creditors of Midwest Christian Villages Inc., et al. For the Period From July 1 2025, Through and Including October 31, 2025* (the “**Fourth Interim Application**”)², filed contemporaneously herewith. To the best of my knowledge, information, and belief, the statements contained in the Fourth Interim Application are true and correct. In addition, I believe the Fourth Interim Application complies with the Local Bankruptcy Rules.

3. In connection therewith, I also hereby certify that:

- i. to the best of my knowledge, information and belief formed after reasonable inquiry, the fees and disbursements sought in the Fourth Interim Application are permissible under the relevant rules, court orders and Bankruptcy Code provisions;
- ii. the fees and disbursements sought in the Fourth Interim Application are billed at rates and are in accordance with practices customarily employed by C&D and are generally accepted by C&D’s clients;
- iii. in providing reimbursable service, C&D does not make a profit in its performance of reimbursable services, whether the service is performed in-house or through a third party;
- iv. C&D did not increase its hourly rates during the Compensation Period; and
- v. the Fourth Interim Application includes approximately 10 hours for reviewing or revising C&D’s time records and invoices.

² Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to such terms in the Fourth Interim Application.

4. With respect to Section B.2 of the Local Rules, I hereby certify that the Committee chair has been provided a copy of the Fourth Interim Application, including statements of fees and out-of-pocket expenses, lists of professionals providing services, their respective billing rates, the work hours expended by each individual, descriptions of services rendered, and a reasonably detailed breakdown of out-of-pocket expenses incurred, at least twenty-one (21) days prior to the hearing on the Fourth Interim Application. I further certify that in accordance with the Local Rules, C&D submitted monthly fee statements for July through October during this Compensation Period and was paid 80% of the requested fees and expenses in accordance with the Debtors' budget³.

5. The following table demonstrates the amounts C&D has requested and received, which, pursuant to Local Rule 2016-2 C, are subject to approval, modification or disgorgement on interim application:

<u>Monthly Fee Statement</u>	<u>Total Compensation Requested</u>	<u>Compensation Actually Received (80%)</u>	<u>Expenses Requested</u>	<u>Expenses Actually Received (100%)</u>
Jul. 1, 2025 – Jul. 31, 2025	\$17,369.00	\$13,895.60	\$0.00	N/A
Aug. 1, 2025 – Aug. 31, 2025	\$7,939.00	\$6,351.20	\$0.00	N/A
Sept. 1, 2025 – Sept. 30, 2025	\$11,188.50	\$8,950.80	\$0.00	N/A
Oct. 1, 2025 – Oct. 31, 2025	\$2,702.00	TBD	\$0.00	N/A

6. In accordance with Section B.3 of the Local Rules, I hereby certify to the best of my knowledge, information, and belief, and my participation in the status conferences and review and monitoring of the docket, that the information contained in the Fourth Interim Application regarding the general administrative status of the Debtors' chapter 11 cases, is true and correct.

³ As of the date of the Fourth Interim Application, C&D has not been paid on its October Monthly Fee Statement.

7. In accordance with Section B.4 of the Local Rules, I hereby certify to the best of my knowledge, information, and belief, that the information contained in the Fourth Interim Application regarding the twelve factors set forth by the Fifth Circuit in *Johnson v. Georgia Highway Express, Inc.*, have been identified and sufficiently satisfied with a summary of significant events which have occurred in these chapter 11 cases and a summary of major activities under each project category.

8. In accordance with Bankruptcy Rule 2016(a) and section 504 of the Bankruptcy Code, I certify that no agreement or understanding exists between C&D and any other entity for the sharing of compensation received or to be received for services rendered in or in connection with the above cases except as authorized pursuant to the Bankruptcy Code, the Bankruptcy Rules, and the Local Bankruptcy Rules. All services for which compensation is sought were professional services on behalf of the Committee and not on behalf of any other person.

Dated: New York, New York
November 10, 2025

CULLEN AND DYKMAN LLP

By: /s/ Michael H. Traison
Michael H. Traison, Esq.
Michelle McMahon, Esq.
Kyriaki Christodoulou, Esq.
One Battery Park Plaza, 34th Floor
New York, New York 10004
Tel: (212) 732-2000
mtraison@cullenllp.com
mmcmahon@cullenllp.com
kchristodoulou@cullenllp.com

*Counsel to the Official Committee of Unsecured
Creditors of Midwest Christian Villages Inc., et
al.*

Exhibit D

Compensation By Project Category

Matter No.	Project Category	Hours	Fees
B110	Case Administration	18.1	13,847.50
B120	Asset Analysis and Recovery	4.5	3,622.50
B130	Asset Disposition	1.2	960.00
B135	Prepare for and Attend Hearings	3.4	2,737.00
B150	Meetings of & Communications with Creditor	2.3	1,817.00
B160	Fee/Employment Applications	9.9	4,758.00
B205	Debtor in Possession Finance Issues	11.8	9,499.00
B210	Business Operations	0.4	322.00
B230	Financing/Cash Collections	0.9	448.00
B280	Litigation Contested Matters and Adversa	0.4	316.00
B320	Plan And Disclosure Statement(Incl Busin	1	790.00
B330	Budgeting	0.2	82.00
Grand Total:		54.1	39,199.00

Exhibit E

Information for Professionals Rendering Services During Compensation Period

CULLEN AND DYKMAN LLP

Information for Professionals Rendering Services During Compensation Period

<u>Professional</u>	<u>Timekeeper No.</u>	<u>Title</u>	<u>Group</u>	<u>Bar Admission</u>	<u>Billing Rate</u>	<u>Hours</u>	<u>Total</u>
Michael H. Traison	9130	Partner	Bankruptcy and Restructuring	1983	\$805	37.6	\$30,268.00
Michelle K. McMahon	9091	Partner	Bankruptcy and Restructuring	2000	\$790	5.7	\$4,503.00
Kyriaki A. Christodoulou	9492	Associate	Bankruptcy and Restructuring	2021	\$410	10.8	\$4,428.00
Total Hours Billed:	54.1						
Total Fees Billed:	\$39,199.00						

Exhibit F

Detailed Computer-Generated Summary of Time Expended During Compensation Period

Date	Category	Name	Hours	Amount	Narrative
07/01/2025	B110	MICHAEL H TRAISSON	0.3	241.50	Review and comment on status report letter to the committee
07/01/2025	B110	MICHELLE K MCMAHON	0.8	632.00	Prepare summary of hearing and case status for Committee.
07/02/2025	B110	KYRIAKI CHRISTODOULOU	0.2	82.00	Review June fee statement. Circulate copy for service upon MSL.
07/02/2025	B110	MICHAEL H TRAISSON	1.5	1,207.50	Work on application and receipt and review of correspondence from the debtor regarding same and drafting
07/14/2025	B110	KYRIAKI CHRISTODOULOU	0.2	82.00	Review correspondence from local counsel re: appearance on application to employ chief restructuring officer and responses.
07/14/2025	B110	MICHAEL H TRAISSON	0.2	161.00	Follow up on interim fee application
07/14/2025	B110	MICHAEL H TRAISSON	0.9	724.50	Receipt of correspondence from financial advisors and review third interim fee application of committee; correspondence from committee chair
07/17/2025	B110	MICHAEL H TRAISSON	0.8	644.00	Receipt to the review of docket and motion for settlement and proposed order and correspondence with half state legal counsel
07/24/2025	B110	MICHAEL H TRAISSON	1	805.00	Receipt and review of fourth omnibus motion to reject certain executory contracts; motion for entry of an order scheduling expedited order amended notices of hearing; review of applications for compensation;
08/12/2025	B110	KYRIAKI CHRISTODOULOU	0.6	246.00	Prepare summary of fee applications for M.Traisson's use at upcoming hearing.
08/13/2025	B110	MICHAEL H TRAISSON	0.2	161.00	Correspondence to Mr. Navid re results of hearing
08/20/2025	B110	MICHAEL H TRAISSON	0.4	322.00	Receipt and review of docket report and examination of orders entered
08/20/2025	B110	MICHAEL H TRAISSON	0.2	161.00	Receipt and review of the court order regarding fees and expenses of committee professionals
08/28/2025	B110	MICHAEL H TRAISSON	0.9	724.50	Multiple correspondence from debtor regarding ERC confirmation letter and review proposed markup of trade agreement
09/02/2025	B110	MICHAEL H TRAISSON	0.8	644.00	Correspondence from Sean, O'Connor and multiple correspondence among counsel and non-disclosure agreement and attention to sale
09/04/2025	B110	KYRIAKI CHRISTODOULOU	0.2	82.00	Review service of monthly fee statement. Schedule objection deadline.
09/04/2025	B110	MICHAEL H TRAISSON	0.7	563.50	Multiple correspondence with creditor committee member regarding claims, bar dates, possibilities of recovery
09/11/2025	B110	MICHAEL H TRAISSON	0.4	322.00	Correspondence from community member regarding administrative matters
09/15/2025	B110	MICHAEL H TRAISSON	0.6	483.00	Correspondence from Creditor regarding payment of claim; research file and prepare a response; correspondence to Creditor inviting telephone call
09/15/2025	B110	MICHAEL H TRAISSON	1	805.00	Review correspondence with committee; prepare for committee meeting; address structured dismissal concept; respond to exclusivity request; follow up
09/16/2025	B110	MICHAEL H TRAISSON	0.3	241.50	Review and Examination of Debtors Motion for Entry of an Order Scheduling an Expedited Hearing (Filed by Debtor Midwest Christian Villages, Inc.)
09/16/2025	B110	MICHAEL H TRAISSON	0.3	241.50	Review and Examination of Debtors' Sixth Motion Pursuant to 11 U.S.C. § 1121(d) to Extend Exclusive Periods [Hearing scheduled 9/29/2025 at 11:00 AM at Bankruptcy Courtroom 7 North] (Filed by Debtor Midwest Christian Villages, Inc.)
09/17/2025	B110	MICHAEL H TRAISSON	0.4	322.00	Review of strategy and preparation for meeting with Debtor counsel
09/18/2025	B110	MICHAEL H TRAISSON	0.4	322.00	Telephonic meeting with Mr. Richards re resolution of cases, structured dismissals, balances owed and secured debt
09/19/2025	B110	KYRIAKI CHRISTODOULOU	0.2	82.00	Correspondence re: payment on August invoice.
09/19/2025	B110	MICHAEL H TRAISSON	0.4	322.00	Review of Notice of Filing of Monthly Compensation Report of Healthcare Management Partners, LLC for the Period of August 1, 2025 Through and Including August 31, 2025 (Filed by Debtor Midwest Christian Villages, Inc.)
09/24/2025	B110	MICHAEL H TRAISSON	0.3	241.50	Review of Monthly Operating Report for Midwest Christian Villages, Inc., et. al. for the Period Ending August 31, 2025 (Filed by Debtor Midwest Christian Villages, Inc.)
09/25/2025	B110	KYRIAKI CHRISTODOULOU	0.2	82.00	Correspondence with chambers re: upcoming hearing and dial-in information for MT.
09/26/2025	B110	KYRIAKI CHRISTODOULOU	0.2	82.00	Correspondence re: upcoming hearing and logistics. Review docket for timing and details.
09/30/2025	B110	MICHAEL H TRAISSON	0.5	402.50	Review of Certificate of Service of YunKyung Yu re: 1) Monthly Operating Report for Midwest Christian Villages, Inc., et. al. for the Period Ending August 31, 2025; and 2) Notice of Agenda for Matters Continued and Set for Hearing Scheduled for September
10/02/2025	B110	MICHAEL H TRAISSON	0.2	161.00	Review Order Approving Debtors' Sixth Motion Pursuant to 11 U.S.C. § 1121(d) to Extend Exclusive Periods
10/02/2025	B110	MICHAEL H TRAISSON	0.2	161.00	Review Order Granting Debtors' Fifth Omnibus Motion to Reject Certain Executory Contracts and Unexpired Leases
10/02/2025	B110	MICHAEL H TRAISSON	0.2	161.00	Review Order Scheduling an Expedited Hearing
10/09/2025	B110	MICHAEL H TRAISSON	0.3	241.50	Receipt and review of docket and examination of notices of budget filings

Date	Category	Name	Hours	Amount	Narrative
10/15/2025	B110	MICHAEL H TRAISSON	1	805.00	Attention to litigation and receipt and review of complaint
10/20/2025	B110	MICHAEL H TRAISSON	0.3	241.50	Examination of docket and receipt and review of notice of filing of monthly compensation report of healthcare management
10/23/2025	B110	MICHAEL H TRAISSON	0.3	241.50	Attention to administrative matters, docket, expense applications, and follow up
10/28/2025	B110	MICHAEL H TRAISSON	0.5	402.50	Review and analysis of Chapter 11 Monthly Operating Report for the Month Ending: 09/30/2025 Filed by Debtor Midwest Christian Villages, Inc.. (O'Brien, Stephen)
	B110 Total		18.1	13,847.50	
07/08/2025	B120	MICHAEL H TRAISSON	0.4	322.00	Correspondence from bankruptcy specialist, representing Hopp estate, and follow up regarding settlement and approval of documents, which have been prepared
07/08/2025	B120	MICHAEL H TRAISSON	0.5	402.50	Correspondence from Mr. Richards and attention to sale of remnant assets in lieu of sale which had been confirmed; outreach to committee
07/09/2025	B120	MICHAEL H TRAISSON	0.2	161.00	Correspondence from Hopp estate council regarding settlement proposal
07/10/2025	B120	MICHAEL H TRAISSON	1	805.00	Correspondence from attorney for Hopp estate, review revisions, review final drafts, correspondence to debtor in possession, legal counsel, and request for approvals, follow up
07/10/2025	B120	MICHAEL H TRAISSON	0.5	402.50	Receipt and review of revisions and updates; additional negotiations with half estate counsel; follow up
07/15/2025	B120	MICHAEL H TRAISSON	0.9	724.50	Correspondence from Hopp estate legal counsel re settlement and response with escrow request and documentation
08/01/2025	B120	MICHAEL H TRAISSON	1	805.00	Correspondence from Mr. Richards; review new asset purchase agreement for remnant asset; confer with committee financial advisor; communication with chairperson of committee; and follow up
	B120 Total		4.5	3,622.50	
07/01/2025	B130	MICHAEL H TRAISSON	0.3	241.50	Correspondence to and from Hopp Estate lawyers regarding settlement
07/02/2025	B130	MICHAEL H TRAISSON	0.2	161.00	Correspondence regarding Hopp estate claim and resolution
07/11/2025	B130	MICHAEL H TRAISSON	0.3	241.50	Attention to remnant assets purchase, consult with committee, financial advisor, and examine correspondence regarding same
07/11/2025	B130	MICHELLE K MCMAHON	0.4	316.00	Review remnant assets documents and correspond with Committee, Province and M. Traisson regarding sale.
	B130 Total		1.2	960.00	
07/23/2025	B135	MICHAEL H TRAISSON	0.5	402.50	Prepare for presentations re applications and correspondence with court regarding hearing
08/11/2025	B135	MICHAEL H TRAISSON	0.8	644.00	Review docket and various filings and preparation for hearing
08/12/2025	B135	MICHAEL H TRAISSON	0.8	644.00	Preparations for presentation on behalf of committee financial advisor and professionals re application and hearing tomorrow
08/13/2025	B135	MICHAEL H TRAISSON	0.8	644.00	Prepare for and attend August omnibus hearing
09/29/2025	B135	MICHAEL H TRAISSON	0.5	402.50	Prepare for and attend omnibus hearing
	B135 Total		3.4	2,737.00	
09/15/2025	B150	MICHELLE K MCMAHON	0.8	632.00	Prepare for and attend Committee meeting (.7); correspond with Debtors' counsel regarding Committee position and call regarding structured dismissal (.1).
09/19/2025	B150	MICHELLE K MCMAHON	1.4	1,106.00	Prepare communication to Committee regarding communications with Debtors' counsel and status and strategy of the case.
09/22/2025	B150	MICHELLE K MCMAHON	0.1	79.00	Correspond with Committee regarding case status and strategy.
	B150 Total		2.3	1,817.00	
07/09/2025	B160	KYRIAKI CHRISTODOULOU	0.6	246.00	Coordinate preparation of fee reports for third interim fee application. Communications internally and with Province re: the same.
07/09/2025	B160	KYRIAKI CHRISTODOULOU	2.2	902.00	Draft and prepare third interim fee application.
07/10/2025	B160	KYRIAKI CHRISTODOULOU	3.5	1,435.00	Draft third interim fee application.
07/10/2025	B160	MICHAEL H TRAISSON	1	805.00	Preparation of third interim fee application and review of attachments and documentation and entries and correspondence to local counsel
07/11/2025	B160	MICHELLE K MCMAHON	0.8	632.00	Review and revise fee application.
07/14/2025	B160	KYRIAKI CHRISTODOULOU	0.4	164.00	Finalize third interim fee application. Circulate copies to local counsel for filing.
08/19/2025	B160	KYRIAKI CHRISTODOULOU	0.5	205.00	Correspondence re: proposed orders approving fee applications. Revise Province's order and our order. Submit to chambers for entry.
08/20/2025	B160	KYRIAKI CHRISTODOULOU	0.2	82.00	Review order granting third interim fee application and discuss next steps internally.
08/26/2025	B160	KYRIAKI CHRISTODOULOU	0.4	164.00	Review invoices and monies received. Work with accounting to properly apply fees to invoices.
09/03/2025	B160	KYRIAKI CHRISTODOULOU	0.3	123.00	Review August Fee Statement. Coordinate service upon MSL.

Date	Category	Name	Hours	Amount	Narrative
	B160 Total		9.9	4,758.00	
07/07/2025	B205	MICHAEL H TRAISSON	0.6	483.00	Correspondence to Laura Castagna regarding Hopp estate claim; correspondence to bondholder counsel and to debtor in possession counsel regarding settlement and strategy regarding objection to claim
07/07/2025	B205	MICHAEL H TRAISSON	0.8	644.00	Follow up correspondence from Laura Castagna, including revisions to documents and review of same and comments regarding settlement; correspondence to Clay Taylor regarding revisions and follow up
07/07/2025	B205	MICHAEL H TRAISSON	0.6	483.00	Receive revisions from Mr. Taylor; receive approval from Mr. Blythe; review and draft correspondence to legal counsel for Hopp estate.
07/14/2025	B205	MICHAEL H TRAISSON	1	805.00	Attention to Hopp estate settlement; correspondence from Laura Castagna, correspondence to Debtor in Possession legal counsel; correspondence from Mr. Blythe; review modified document.
07/14/2025	B205	MICHAEL H TRAISSON	1	805.00	Receipt and review of motion regarding chief restructuring, officer; correspondence with local counsel for the committee; correspondence to the DIP legal counsel and follow up
07/16/2025	B205	MICHAEL H TRAISSON	0.8	644.00	Correspondence from counsel to claimants and review fully executed settlement agreement; correspondence to debtor counsel and follow up re Hopp estate claim
08/06/2025	B205	MICHAEL H TRAISSON	0.7	563.50	Correspondence from counsel for debtor possession and follow up regarding asset sales and calls with the person of committee
08/07/2025	B205	MICHAEL H TRAISSON	0.4	322.00	Correspondence from DIP legal counsel regarding omnibus hearings and scheduling of both omnibus hearings and response
08/19/2025	B205	MICHAEL H TRAISSON	1	805.00	Receipt and review of court orders entered; correspondence to John Howley missing one court order; receipt in review of correspondence from DIP legal counsel regarding settlement order regarding estate claim and follow up
08/25/2025	B205	MICHAEL H TRAISSON	0.4	322.00	Correspondence from and to Laura Castagna regarding settlement and regarding Medicare claims
08/25/2025	B205	MICHAEL H TRAISSON	1	805.00	Receipt in review of correspondence from Debtor in Possession legal counsel regarding litigation and receipt and review of Richter litigation and communications with committee
09/04/2025	B205	MICHAEL H TRAISSON	0.4	322.00	Correspondence from DIP counsel and correspondence from Hopp estate counsel and attention to entry of order
09/05/2025	B205	MICHAEL H TRAISSON	0.4	322.00	Correspondence from and to Lora Castagna regarding claims and enforcement and collection and correspondence from legal counsel to the debtor in possession
09/09/2025	B205	MICHAEL H TRAISSON	1	805.00	Multiple correspondence from bondholders to debtor and response from debtor regarding purchase acquisition
09/11/2025	B205	MICHAEL H TRAISSON	0.9	724.50	Correspondence yesterday and today from legal counsel to the DIP regarding extension of exclusivity; consideration of same; correspondence to committee;
09/25/2025	B205	MICHAEL H TRAISSON	0.3	241.50	Correspondence from and to legal counsel for the debtor in possession and follow up telephone call
09/30/2025	B205	MICHAEL H TRAISSON	0.5	402.50	Correspondence from and correspondence to Debtor in Possession legal counsel re ERC credits collections;
	B205 Total		11.8	9,499.00	
07/25/2025	B210	MICHAEL H TRAISSON	0.4	322.00	Receipt and review of operating report
	B210 Total		0.4	322.00	
08/13/2025	B230	MICHAEL H TRAISSON	0.2	161.00	Correspondence to Laura Castagna re settlement
10/02/2025	B230	KYRIAKI CHRISTODOULOU	0.3	123.00	Review cash received. Include data in record of payment spreadsheet. Make note of holdback amounts.
10/03/2025	B230	KYRIAKI CHRISTODOULOU	0.4	164.00	Review September's invoice. Circulate for service upon MSL.
	B230 Total		0.9	448.00	
07/14/2025	B280	MICHELLE K MCMAHON	0.2	158.00	Review correspondence from local counsel regarding motion and teleconference and correspond with M. Traisson regarding motion and potential response.
08/25/2025	B280	MICHELLE K MCMAHON	0.2	158.00	Review correspondence from Debtors' counsel regarding draft complaint.
	B280 Total		0.4	316.00	
09/11/2025	B320	MICHELLE K MCMAHON	0.7	553.00	Correspondence with Committee and Debtors regarding exclusivity (.4) correspond with Committee member regarding resignation (.3).
09/18/2025	B320	MICHELLE K MCMAHON	0.3	237.00	Teleconference with Debtor's counsel regarding plan or structure dismissal (.2); draft summary for Committee of plan and structured dismissal alternatives and bases (.1).
	B320 Total		1	790.00	
07/21/2025	B330	KYRIAKI CHRISTODOULOU	0.2	82.00	Review wire received for payment of 80% of June fees. Coordinate application of the same with accounting staff. Update payment spreadsheet accordingly.

Date	Category	Name	Hours	Amount	Narrative
	B330 Total		0.2	82.00	
		Grand Total:	54.1	39,199.00	