

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
(Joint Administration Requested)

Hearing Date: July 17, 2024
Hearing Time: 2:00 p.m. (CT)
Hearing Location: Courtroom 7 North

**NOTICE OF AGENDA FOR FIRST DAY HEARING ON FIRST DAY MOTIONS
SCHEDULED FOR JULY 17, 2024 AT 2:00 P.M. (PREVAILING CENTRAL TIME)**

1. **Evidentiary Support for First Day Pleadings.**

A. **First Day Declaration.** First Day Declaration of Kathleen (Kate) Bertram [Docket No. 3].

Status: The Declaration will be relied upon as evidentiary support for the first day matters listed below.

2. **First Day Pleadings.**

A. **Joint Administration.** Debtors' Motion Requesting Joint Administration of Chapter 11 Cases [Docket No. 14].

Status: This matter is going forward.

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] and (xxi) Shawnee Christian Nursing Center, LLC [0068].



- B. ***Schedules and SOFA Extension Motion.*** Motion of the Debtors for Order (I) Extending the Time to File Schedules and Statements; (II) Waiving the Requirements to File Equity Lists and Provide Notice to Equity Security Holders; (III) Authorizing the Debtors to File a Consolidated List of the Debtors Thirty (30) Largest Unsecured Creditors; (IV) Authorizing the Debtors to File a Consolidated and Redacted Creditor Matrix; and (V) Approving the Manner and Service of Notice of Case Commencement [Docket No. 18].

Status: This matter is going forward.

- C. ***Wages Motion.*** Debtors' Motion for Interim and Final Orders (I) Authorizing, but not Directing, Debtors to (A) Pay Prepetition Wages, Salaries, Employee Benefits, and other Obligations, (B) Maintain Employee Benefit Programs, and (C) Pay Related Administrative Obligations; and (II) Granting Related Relief [Docket No. 4].

Status: This matter is going forward.

- D. ***Utilities Motion.*** Debtors' Motion for Entry of Interim and Final Orders (I) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Utility Services; (II) Determining Adequate Assurance of Payment for Future Utility Services; (III) Establishing Procedures for Determining Adequate Assurance of Payment; and (IV) Granting Related Relief [Docket No. 5].

Status: This matter is going forward.

- E. ***Insurance Motion.*** Debtors' Motion for Entry of Order (I) Authorizing the Debtors to Continue (A) Insurance Programs and (B) Prepetition Surety Bonds, and Pay Obligations Arising Thereunder; and (II) Preventing Insurance Companies from Enforcing Ipso Facto Clauses or Giving Any Notice of Termination or Otherwise Modifying Any Insurance Policy Without Obtaining Relief from the Automatic Stay [Docket No. 6].

Status: This matter is going forward.

- F. ***Cash Management Motion.*** Motion for Entry of Interim and Final Orders Authorizing Debtors to: (1) Continue Using Existing Cash Management System, Bank Accounts, and Business Forms; (2) Implement Changes to the Cash Management System in the Ordinary Course of Business; (3) Continue Intercompany Transactions; (4) Provide Administrative Expense Priority for Postpetition Intercompany Claims; and (5) Obtain Related Relief [Docket No. 10].

Status: This matter is going forward.

- G. ***Critical Vendors Motion.*** Debtors' Motion for Entry of Interim and Final Orders Authorizing (I) Payment of Certain Prepetition Claims of Critical Vendors; (II) Payment of 503(b)(9) Claims to Certain Critical Vendors; and (III) Financial Institutions to Honor and Process Related Checks and Transfers [Docket No. 7].

Status: This matter is going forward.

- H. ***Motion to Seal Patient Information.*** Debtors' Motion for Entry of an Order (I) Authorizing the Filing Under Seal of Confidential Patient Information and (II) Granting Related Relief [Docket No. 9].

Status: This matter is going forward.

- I. ***Joint Motion to Approve DIP Financing and Cash Collateral Usage.*** Debtors' Motion for Interim and Final Orders (1) Authorizing the Debtors To Obtain Post-Petition Financing, (2) Authorizing Debtors In Possession to Use Cash Collateral, (3) Providing Adequate Protection, (4) Granting Liens, Security Interests and Superpriority Claims, and (5) Scheduling a Final Hearing [Docket No. 11].

Declaration of Shawn O'Conner in Support of Motion to Approve DIP Financing and Cash Collateral Usage [Docket No. 12].

Status: This matter is going forward.

- J. ***Application to Approve Retention of Chief Restructuring Officer.***

Debtors' Application Pursuant to 11 U.S.C. §§ 105(a) and 363(b) to (I) Retain Healthcare Management Partners, LLC to Provide the Debtors a Chief Restructuring Officer, Restructuring Officers and Certain Additional Personnel and (II) Designate Shawn O'Conner as Chief Restructuring Officer and Scott Phillips and Zach Rowe as Restructuring Officers for the Debtors, Effective as of the Petition Date [Docket No. 24].

Status: This matter is going forward.

3. **Retention Applications.**

- A. ***Dentons Retention Application.*** Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Dentons US LLP as Attorneys for the Debtors and Debtors in Possession, Effective as of the Petition Date [Docket No. 26].

Status: This matter is going forward.

- B. ***Summers Compton Retention Application.*** Debtors' Application for Authority to Employ Summers Compton Wells LLC as Local Counsel for the Debtors [Docket No. 19].

Status: This matter is going forward.

- C. ***Verita Retention Application.*** Debtors' Application for Appointment of Kurtzman Carson Consultants, LLC d/b/a/ Verita Global as Claims and Noticing Agent and Administrative Advisor, Effective as of the Petition Date [Docket No. 20].

Status: This matter is going forward.

- D. ***Zeigler Retention Application.*** Debtors' Application for Entry of an Order Authorizing the Retention and Employment of B.C. Ziegler and Company as Financial Advisor to the Debtors and Debtors in Possession, Effective as of the Petition Date [Docket No. 25].

Status: This matter is going forward.

4. **Bid Procedures and Sale Motion. [Request for Hearing Date]**

- A. ***Bid Procedures and Sale Motion.*** Debtors' Motion for the Entry of: (A) An Order: (1) Approving Auction Sale Format and Bidding Procedures; (2) Approving Process for Discretionary Selection of Stalking Horse Bidder and Bid Protections; (3) Approving Form of Notice to be Provided to Interested Parties; (4) Scheduling a Court Hearing to Consider Approval of the Sale to the Highest and Best Bidder; and (5) Approving Procedures Related to the Assumption of Certain Executory Contracts and Unexpired Leases; and (B) an Order Authorizing the Sale of Property Free and Clear of All Claims, Liens, and Encumbrances [Docket No. 13].

Status: This matter is to be set for hearing to allow for longer notice. Debtors request that the Court set a hearing date on this Motion for the week of July 22, 2024 or early the week of July 29, 2024 with a written objection deadline.

5. **Patient Care Ombudsman Waiver Motion. [Request for Hearing Date]**

- A. Debtors' Motion for Entry of an Order, Pursuant to Section 333(A) of the Bankruptcy Code and Bankruptcy Rules 2007.2, (I) Waiving the Appointment of a Patient Care Ombudsman and (II) Allowing the Debtors to Self-Report [Docket No. 8].

Status: This matter is to be set for second day hearings later this month.

Dated: July 16, 2024
St. Louis, Missouri

Respectfully submitted,

DENTONS US LLP

/s/ Stephen O'Brien

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