

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

<p>In re:</p> <p>MIDWEST CHRISTIAN VILLAGES, INC. <i>et al</i>,¹</p> <p style="padding-left: 100px;">Debtors.</p>	<p>§ Chapter 11</p> <p>§</p> <p>§ Case No. 24-42473-659</p> <p>§</p> <p>§ Jointly Administered</p> <p>§</p> <p>§ Objection Deadline: June 23, 2025</p> <p>§ Hearing Date: June 30, 2025</p> <p>§ Hearing Time: 11:00 a.m. (CT)</p> <p>§ Location: Courtroom 7 North</p> <p>§</p>
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DEBTORS' THIRD OMNIBUS OBJECTION TO CLAIMS

WARNING: THIS THIRD OMNIBUS OBJECTION INCLUDES OBJECTIONS TO MULTIPLE PARTIES' CLAIMS. YOU SHOULD LOCATE YOUR NAME AND CLAIM NUMBER IN THIS OMNIBUS OBJECTION AND THE SCHEDULES ATTACHED HERETO AS EXHIBIT A. A written response must be filed with the Clerk, U.S. Bankruptcy Court, 111 South Tenth Street, 4th Floor, St. Louis, Missouri, 63102, and a copy served upon the undersigned by June 23, 2025 (i.e., seven (7) days prior to the hearing date on this notice).

Failure to file a timely response may result in the Court granting the relief requested prior to the hearing date. You should read this paper carefully and discuss it with your attorney, if you have one.

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].



The Debtors, by and through undersigned counsel,² object to the following claims below and as detailed on the Schedules attached hereto as **Exhibit A**. The Debtors' objections to the employee paid time off claims ("PTO") listed below are in regards to former employees of the Debtors.

Claims to be Modified as to Debtor

1. The Debtors object to Claim No. 3 filed by Encounter Telehealth, Inc. in the amount of \$358.21 on the basis that the claim should be modified to be against Christian Homes, Inc. The modification is an adjustment after further review and analysis of the claim amount and a reasonable review of the Debtors' books and records.

Claims to be Modified as to Classification

1. The Debtors object to Claim No. 141 filed by Frank X. Farley as an administrative priority claim on the basis that the claim should be reclassified to a general unsecured claim in the amount of \$3,273.48. This modification is an adjustment after a review of the proof of claim and any attachments thereto, a reasonable review of the Debtors' books and records, and/or discussion with the claimant, none of which support that the claim is an administrative priority claim.

2. The Debtors object to Claim No. 42 filed by Humana, Inc., Humana Insurance Company, and its Affiliates as a secured claim on the basis that the claim should be reclassified to a general unsecured claim in the amount of \$7,613.98. This modification is an adjustment after a review of the proof of claim and any attachments thereto, a reasonable review of the Debtors' books and records, and/or discussion with the claimant, none of which support that the claim is a secured claim.

3. The Debtors object to Claim No. 4 filed by Integral Rx as an administrative priority claim in the amount of \$16,652.51 and a secured claim in the amount of \$81,364.20 on the basis that the

² This Omnibus Objection is filed jointly by the firms Dentons and Summers Compton. If a claimant has a substantive dispute with this Omnibus Objection and the claimant is a client of either firm, then the other firm will handle any dispute with respect to that creditor's claim.

claim should be reclassified to an administrative priority claim in the amount of \$16,652.51 and a general unsecured claim in the amount of \$81,364.20. This modification is an adjustment after a review of the proof of claim and any attachments thereto, a reasonable review of the Debtors' books and records, and/or discussion with the claimant, none of which support that the claim is a secured claim.

4. The Debtors object to Claim No. 27 filed by Mitsubishi HC Capital America, Inc. as a secured claim on the basis that the claim should be reclassified to a general unsecured claim in the amount of \$69,713.00. This modification is an adjustment after a review of the proof of claim and any attachments thereto, a reasonable review of the Debtors' books and records, and/or discussion with the claimant, none of which support that the claim is a secured claim.

5. The Debtors object to Claim No. 131 filed by Thomas Daniel Ellis as an administrative priority claim on the basis that the claim should be reclassified to a general unsecured claim in the amount of \$1,150.00. This modification is an adjustment after a review of the proof of claim and any attachments thereto, a reasonable review of the Debtors' books and records, and/or discussion with the claimant, none of which support that the claim is an administrative priority claim.

6. The Debtors object to Claim No. 30-2 filed by United Nursing Services d/b/a United Methodist Healthcare Recruitment (UMHR) as a secured claim on the basis that the claim should be reclassified to a general unsecured claim in the amount of \$100,599.12. This modification is an adjustment after a review of the proof of claim and any attachments thereto, a reasonable review of the Debtors' books and records, and/or discussion with the claimant, none of which support that the claim is a secured claim.

7. The Debtors object to Claim No. 7 filed by Vital Records Control as a secured claim on the basis that the claim should be reclassified to a general unsecured claim in the amount of

\$1,854.62. This modification is an adjustment after a review of the proof of claim and any attachments thereto, a reasonable review of the Debtors' books and records, and/or discussion with the claimant, none of which support that the claim is a secured claim.

Claims to be Modified as to Amount

1. The Debtors object to Claim No. 1 filed by Further Technology LLC in the amount of \$800.00, on the basis that the claim amount should be modified to \$600.00.
2. The Debtors object to Claim No. 4 filed by Integral Rx in the amount of \$16,652.51, on the basis that the claim amount should be modified to \$12,000.00.

Claims to be Modified as to Liability

1. The Debtors object to Claim No. 33 filed by Butler, Don & Carol in the secured amount of \$18,939.80, on the basis that the underlying liability for this claim has been assumed by the applicable facility purchaser pursuant to the terms of an Asset Purchase Agreement, and the Debtor is no longer the proper party in interest with respect to this claim.
2. The Debtors object to Claim No. 140 filed by Donald Butler and Carol Butler in the secured amount of \$18,939.80, on the same basis as its objection to Claim No. 33 and because its duplicative of Claim No. 33.
3. The Debtors object to Claim No. 150 filed by Grane Supply, Inc. d/b/a Grane Rx in the amount of \$18,442.87, on the basis that pursuant to the Debtors' book and records, no amounts are due and no liability exists for this claimant.
4. The Debtors object to Claim No. 18 filed by Karl Koenig f/b/o Lilliane Koenig in the amount of \$65,610.00, on the basis that the underlying liability for this claim has been assumed by the applicable facility purchaser pursuant to the terms of an Asset Purchase Agreement, and the Debtor is no longer the proper party in interest with respect to this claim.

Duplicate Claims

1. The Debtors object to Claim No. 30-1 filed by United Nursing Services d/b/a United Methodist Healthcare Recruitment (UMHR) in the secured amount of \$52,404.40 and the general unsecured amount of \$48,194.72, on the basis that it is duplicative of Claim No. 30-2 filed by claimant.

WARNING: THIS OBJECTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE OBJECTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE BY JUNE 23, 2025.

YOUR RESPONSE MUST STATE WHY THE OBJECTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE OBJECTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING ON THE DATE IS SET OUT ABOVE. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE OBJECTION AT THE HEARING. REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.

THIS OBJECTION WILL BE CALLED UP FOR HEARING ON JUNE 30, 2025 AT 11:00 A.M. (CT) OR AS SOON THEREAFTER AS COUNSEL MAY BE HEARD AT THE UNITED STATES BANKRUPTCY COURT, EASTERN DISTRICT OF MISSOURI, THOMAS F. EAGLETON U.S. COURTHOUSE, 111 SOUTH TENTH STREET, COURTROOM 7 NORTH, ST. LOUIS, MO 63102.

Dated: May 29, 2025
St. Louis, Missouri

Respectfully submitted,

DENTONS US LLP
/s/ Stephen O'Brien

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was filed electronically on May 29, 2025 with the United States Bankruptcy Court for the Eastern District of Missouri and has been served on the parties in interest via e-mail by the Court's CM/ECF System as listed on the Court's Electronic Mail Notice List.

/s/ Robert Richards

Robert Richards
Dentons US LLP

EXHIBIT A

THIRD OMNIBUS CLAIM OBJECTION SCHEDULES

3RD OMNIBUS CLAIMS OBJECTION
SCHEDULE 1

Midwest Christian Villages, Inc., et al. Case No. 24-42473
Claims to be Modified (Debtor)

	NAME	DATE FILED	CLAIM NUMBER / SCHEDULE ID	ASSERTED DEBTOR	MODIFIED DEBTOR	CLASSIFICATION	CLAIM AMOUNT	REASON FOR MODIFICATION
1	Encounter Telehealth, Inc.	09/16/2024	3	Washington Village Estates, LLC	Christian Homes, Inc	General Unsecured	\$358.21	The modification is an adjustment after further review and analysis of the scheduled claim amount and a reasonable review of the Debtors' books and records.

3RD OMNIBUS CLAIMS OBJECTION
SCHEDULE 2

Midwest Christian Villages, Inc., et al. Case No. 24-42473
Claims to be Modified (Classification)

	NAME	DATE FILED	CLAIM NUMBER / SCHEDULE ID	DEBTOR	ASSERTED CLASSIFICATION	CLAIM AMOUNT	MODIFIED CLASSIFICATION	CLAIM AMOUNT	REASON FOR MODIFICATION
1	Frank X. Farley	10/03/2024	141	Midwest Christian Villages, Inc.	Admin Priority	\$3,273.48	General Unsecured	\$3,273.48	The modification is an adjustment after a review of the proof of claim and any attachments thereto, a reasonable review of the Debtors' books and records, and/or discussion with the claimant.
2	Humana, Inc., Humana Insurance Company, and its Affiliates	10/08/2024	42	Christian Homes, Inc.	Secured	\$7,613.98	General Unsecured	\$7,613.98	The modification is an adjustment after a review of the proof of claim and any attachments thereto, a reasonable review of the Debtors' books and records, and/or discussion with the claimant.
3	Integral Rx	09/18/2024	4	Senior Care Pharmacy Services, LLC	Admin Priority Secured	\$16,652.51 \$81,364.20	Admin Priority General Unsecured	\$16,652.51 \$81,364.20	The modification is an adjustment after a review of the proof of claim and any attachments thereto, a reasonable review of the Debtors' books and records, and/or discussion with the claimant.
4	Mitsubishi HC Capital America, Inc.	04/15/2025	27	Spring River Christian Village, Inc.	Secured	\$69,713.00	General Unsecured	\$69,713.00	The modification is an adjustment after a review of the proof of claim and any attachments thereto, a reasonable review of the Debtors' books and records, and/or discussion with the claimant.
5	Thomas Daniel Ellis	09/30/2024	131	Midwest Christian Villages, Inc.	Admin Priority	\$1,150.00	General Unsecured	\$1,150.00	The modification is an adjustment after a review of the proof of claim and any attachments thereto, a reasonable review of the Debtors' books and records, and/or discussion with the claimant.
6	United Nursing Services d/b/a United Methodist Healthcare Recruitment (UMHR)	12/11/2024	30-2	Hickory Point Christian Village, Inc.	Secured General Unsecured	\$52,404.40 \$48,194.72	General Unsecured	\$100,599.12	The modification is an adjustment after a review of the proof of claim and any attachments thereto, a reasonable review of the Debtors' books and records, and/or discussion with the claimant.
7	Vital Records Control	09/23/2024	7	Spring River Christian Village, Inc.	Secured	\$1,854.62	General Unsecured	\$1,854.62	The modification is an adjustment after a review of the proof of claim and any attachments thereto, a reasonable review of the Debtors' books and records, and/or discussion with the claimant.

3RD OMNIBUS CLAIMS OBJECTION
SCHEDULE 3

Midwest Christian Villages, Inc., et al. Case No. 24-42473
Claims to be Modified (Amount)

	NAME	DATE FILED	CLAIM NUMBER / SCHEDULE ID	DEBTOR	CLASSIFICATION	ASSERTED CLAIM AMOUNT	MODIFIED CLAIM AMOUNT	REASON FOR MODIFICATION
1	Further Technology LLC	08/29/2024	1	Washington Village Estates, LLC	General Unsecured	\$800.00	\$600.00	The modification is an adjustment after a review of the proof of claim and any attachments thereto, a reasonable review of the Debtors' books and records, and/or discussion with the claimant.
2	Integral Rx	09/18/2024	4	Senior Care Pharmacy Services, LLC	Admin Priority	\$16,652.51	\$12,000.00	The modification is an adjustment after a review of the proof of claim and any attachments thereto, a reasonable review of the Debtors' books and records, and/or discussion with the claimant.

3RD OMNIBUS CLAIMS OBJECTION
SCHEDULE 4

Midwest Christian Villages, Inc., et al. Case No. 24-42473
No Liability Claims

	NAME	DATE FILED	CLAIM NUMBER / SCHEDULE ID	DEBTOR	CLASSIFICATION	CLAIM AMOUNT	REASON FOR MODIFICATION
1	Butler, Don & Carol	10/02/2024	33	Hickory Point Christian Village, Inc.	Secured	\$18,939.80	The underlying liability for this claim has been assumed by the applicable facility purchaser pursuant to the terms of an Asset Purchase Agreement, and the Debtor is no longer the proper party in interest with respect to this claim.
2	Donald Butler and Carol Butler	10/02/2024	140	Midwest Christian Villages, Inc.	Secured	\$18,939.80	The underlying liability for this claim has been assumed by the applicable facility purchaser pursuant to the terms of an Asset Purchase Agreement, and the Debtor is no longer the proper party in interest with respect to this claim.
3	Grane Supply, Inc. d/b/a Grane Rx	10/11/2024	150	Midwest Christian Villages, Inc.	Admin Priority	\$18,442.87	Pursuant to the Debtors' books and records, no amounts are due and no liability exists for this claimant.
4	Karl Koenig f/b/o Lilliane Koenig	10/15/2024	18	Crown Point Christian Village, Inc.	Secured	\$65,610.00	The underlying liability for this claim has been assumed by the applicable facility purchaser pursuant to the terms of an Asset Purchase Agreement, and the Debtor is no longer the proper party in interest with respect to this claim.

3RD OMNIBUS CLAIMS OBJECTION
SCHEDULE 5

Midwest Christian Villages, Inc., et al. Case No. 24-42473
Amended or Duplicate Claims

	NAME	SURVIVING CLAIM DATE FILED	AMENDED OR DUPLICATE CLAIM DATE FILED	SURVIVING CLAIM NUMBER / SCHEDULE ID	AMENDED OR DUPLICATE CLAIM NUMBER / SCHEDULE ID	SURVIVING DEBTOR	AMENDED OR DUPLICATE DEBTOR	CLASSIFICATION	CLAIM AMOUNT	REASON FOR MODIFICATION
1	Donald Butler and Carol Butler	10/02/2024	10/02/2024	140	33	Midwest Christian Villages, Inc.	Hickory Point Christian Village, Inc.	Secured General Unsecured	\$18,939.80 \$170,458.20	The creditor has submitted a proof of claim that is essentially the same as another claim they have already filed, making it redundant.
2	United Nursing Services d/b/a United Methodist Healthcare Recruitment (UMHR)	12/11/2024	10/08/2024	30-2	30-1	Hickory Point Christian Village, Inc.	Hickory Point Christian Village, Inc.	Secured General Unsecured	\$52,404.4 \$48,194.72	The creditor has submitted a proof of claim that is essentially the same as another claim they have already filed, making it redundant.