

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:

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

Debtors.

Chapter 11

Case No. 24-42473-659

(Jointly Administered)

Re: Docket No. 813

Hearing Date: September 29, 2025

Hearing Time: 11:00 a.m. (CT)

Hearing Location: Courtroom 7 North

**DEBTORS MOTION FOR ENTRY OF AN ORDER
SCHEDULING AN EXPEDITED HEARING**

The above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), by an through their undersigned counsel, respectfully state as follows in support of this motion (this “Motion”):

RELIEF REQUESTED

1. By this Motion, and pursuant to § 105(a) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 9006(c) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and Rule 9013-2(A) of the Local Rules of Bankruptcy Procedure for the United States Bankruptcy Court for the Eastern District of Missouri (the “Local Bankruptcy

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].



Rules”), the Debtors seek entry of an order (a) shortening the notice requirement for the *Debtors’ Sixth Motion Pursuant to 11 U.S.C. § 1121(d) to Extend Exclusivity Periods* [Docket No. 813] (the “Sixth Exclusivity Motion”)² and (b) scheduling an expedited hearing on the Sixth Exclusivity Motion for September 29, 2025 at 11:00 a.m. (prevailing Central Time) (the “Hearing”).

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the Eastern District of Missouri (the “Court”) has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334 and Rule 9.01(B) of the Local Rules of the United States District Court for the Eastern District of Missouri. 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).

3. The statutory and legal predicates for the relief requested herein are § 105(a) of the Bankruptcy Code, Rule 9006(c) of the Bankruptcy Rules, and Rule 9013- 2(A) of the Local Bankruptcy Rules.

4. On July 16, 2024, (the “Petition Date”), the Debtors filed voluntary petitions for relief pursuant to chapter 11 of the Bankruptcy Code.

5. The Debtors continue in the operation and management of their business as debtors-in-possession pursuant to §§ 1107 and 1108 of the Bankruptcy Code.

6. On August 8, 2024, the United States Trustee appointed an Official Committee of Unsecured Creditors [Docket No. 121] (the “Creditors’ Committee”).

7. Information regarding the Debtors’ businesses, their capital and debt structure, and the events leading to the filing of these chapter 11 cases is set forth in the *Declaration of Kathleen*

² Capitalized terms used but not otherwise defined herein shall have the meaning ascribed to them in the Fourth Omnibus Rejection Motion.

(Kate) Bertram in Support of the Debtors' Chapter 11 Petition and First Day Motions [Docket No. 3] (the "First Day Declaration"), incorporated by reference herein.

BASIS FOR RELIEF

8. Pursuant to the Local Bankruptcy Rules, the Debtors are seeking an expedited hearing because the Sixth Exclusivity Motion will be filed and served less than twenty-one (21) days prior to the Hearing.

9. Section 105(a) of the Bankruptcy Code authorizes this Court to "issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code]." Further, Bankruptcy Rule 9006(c) provides that the Court, for cause shown, may in its discretion reduce the notice period normally required for motions. Finally, Local Bankruptcy Rule 9013-2(A) allows a hearing to be scheduled on an expedited basis "by written motion, setting forth the reason the matter should be considered on an expedited . . . basis."

10. The Debtors request that the Court shorten the notice period otherwise required by the Local Rules and hear the Sixth Exclusivity Motion on an expedited basis. The relief requested in the Sixth Exclusivity Motion is necessary for the Debtors to continue to effectively wind down their business and continue the transition of certain ongoing collections to the buyers of the Debtors' facilities.

11. The Debtors waited to file the Sixth Exclusivity Motion until such time as the Committee could meet to form an opinion on the relief sought in the Sixth Exclusivity Motion. The Committee was able to meet on Monday September 15, 2025 and the Debtors filed the Sixth Exclusivity Motion the next day.

12. Shortening the notice period will not harm the Debtors' estates or their other creditors.

13. Courts in this district have granted similar relief concerning expedited consideration in other large chapter 11 cases. *See, e.g., In re Foresight Energy LP*, Case No. 20-41308-659 (Bankr. E.D. Mo. May 20, 2021) (granting expedited hearing on reorganized debtors' and general unsecured claims administrators' motion to extend the claims objection deadline); *In re Payless Holdings LLC*, Case No. 19-40883-659 (Bankr. E.D. Mo. October 28, 2019) (granting expedited hearing on debtors' motion to dispose of returned merchandise); *In re Abengoa Bioenergy US Holding, LLC*, No. 16-41161 (Bankr. E.D. Mo. June 16, 2016) (granting expedited hearing on debtors' motion to pay certain prepetition claims); *In re Peabody Energy Corp.*, No. 16-42529 (BSS) (Bankr. E.D. Mo. Dec. 14, 2016) (granting an expedited hearing on DIP repayment motion); *In re Noranda Aluminum, Inc.*, No. 16-10083 (BSS) (Bankr. E.D. Mo. May 13, 2016) (granting expedited hearing to hear debtors' motion approving agreed stipulation and order); *In re Arch Coal, Inc.*, No. 16-40120 (CER) (Bankr. E.D. Mo. Aug. 11, 2016) (granting expedited hearing on debtors' motion to enter into a new insurance premium finance agreement).

NOTICE

14. This Motion and notice of this Motion will be served respectively on the current Master Service List, the current Master Notice List, and any other parties requiring notice to the Sixth Exclusivity Motion. Notice of this Motion and any order entered hereon will be served in accordance with Local Rule 9013-3(A)(1). The Debtors submit that, under the circumstances, no other or further notice is required.

WHEREFORE, the Debtors respectfully request entry of an order granting the relief requested herein, together with such other and further relief as the Court deems just and proper.

Dated: September 16, 2025
St. Louis, Missouri

Respectfully submitted,

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/s/ Stephen O'Brien

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