

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	Chapter 11
	:	
Wordsworth Academy,	:	Case No. 17- 14463 (AMC)
	:	
Debtor.	:	(Joint Administration Requested)
	:	
In re:	:	Chapter 11
	:	
Wordsworth CUA 5, LLC,	:	Case No. 17- 14466 (AMC)
	:	
Debtor.	:	(Joint Administration Requested)
	:	
In re:	:	Chapter 11
	:	
Wordsworth CUA 10, LLC,	:	Case No. 17- 14467 (AMC)
	:	
Debtor. ¹	:	(Joint Administration Requested)
	:	

**NOTICE OF DATE OF EXPEDITED HEARING, MATTERS THAT WILL BE HEARD
AT THE EXPEDITED HEARING AND HOW TO RESPOND**

The above-captioned debtors (collectively, the “Debtors”) each filed voluntary chapter 11 petitions for bankruptcy on June 30, 2017. The Debtors have also filed the Statement of Qualification as Complex Chapter 11 Cases and a Motion for Expedited Hearing.

The Debtors’ chapter 11 cases are being administered under L.B.R. 1001-(2) as Complex Chapter 11 Cases.

An Expedited Hearing is scheduled to be held before the Honorable Ashely M. Chan on **July 6, 2017 at 9:00 a.m.** (prevailing Eastern time) in Courtroom 5, United States Bankruptcy Court for the Eastern District of Pennsylvania, Robert N.C. Nix, Sr. Federal Courthouse 900 Market Street, Philadelphia, PA 19107.

At the Expedited Hearing, the court will consider the following motions and applications:

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: Wordsworth Academy (9031); Wordsworth CUA 5, LLC (0983); and Wordsworth CUA 10, LLC (5980). Wordsworth Academy has an address at 3300 Henry Ave., Philadelphia, PA 19129.

- a. Motion of the Debtors for an Order Directing Joint Administration of their Related Chapter 11 Cases (the “Joint Administration Motion”);
- b. Motion Of The Debtors For An Order Establishing Certain Notice, Case Management, And Administrative Procedures (the “Case Management Motion”);
- c. Motion of the Debtors for an Order (A) Authorizing the Debtors to Pay Certain Prepetition (I) Wages, Salaries, Bonuses, and Other Compensation, (II) Reimbursable Employee Expenses, and (III) Employee Medical and Similar Benefits; (B) Confirming that the Debtors May Continue Prepetition Employee Programs in the Ordinary Course of Business; and (C) Directing Banks and Other Financial Institutions to Honor all Related Checks and Electronic Payment Requests (the “Employee Wages Motion”);
- d. Motion of the Debtors for Entry of an Order: (A) Authorizing the Debtors to (I) Continue Cash Management System, (II) Maintain Existing Bank Accounts and Business Forms and (III) Maintain Existing Investment Practices; and (B) Granting Postpetition Intercompany Claims Administrative Expense Priority (the “Cash Management Motion”);
- e. Motion of the Debtors for Entry of Interim and Final Orders Determining Adequate Assurance of Payment for Future Utility Services (the “Utility Motion”);
- f. Motion of the Debtors for Entry of Interim and Final Orders: (A) Authorizing the Debtors to Use of Cash Collateral of Existing Secured Lenders and Granting Adequate Protection for Use and (B) Prescribing Form and Manner of Notice and Setting the Time for the Final Hearing (the “Cash Collateral Motion”);
- g. Debtor’s Motion For Entry Of An Order Authorizing The Debtors To Continue Insurance Coverage And Premium Financing Entered Into Pre-Petition And Honor Obligations Related Thereto (the “Insurance Motion”);
- h. Motion of Debtors for Entry of an Order Authorizing Assumption of Certain Executory Contracts (the “Assumption Motion”);
- i. Motion of Debtors for Entry of an Order Authorizing The Rejection of Real Property Lease Effective As Of July 31, 2017 (the “Rejection Motion”); and

- j. Motion Of The Debtors For Entry Of Interim And Final Orders: (I) Authorizing Them To Obtain Post-Petition Financing From Play And Learn Pursuant To Sections 363 And 364 Of The Bankruptcy Code, (ii) Authorizing Them To Enter Into The Debtor-In-Possession Credit Agreement, And (Iii) Granting Liens And Administrative Priority Claims To Dip Lender Pursuant To Section 364 Of Bankruptcy Code And Modifying The Automatic Stay To Implement The Terms Of The Dip Order (the “DIP Motion”)

YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.

1. If you do not want the court to grant the relief sought in a motion or an application, or if you wish to object to the Debtors’ cases being administered as Complex Chapter 11 cases, or if you want the court to consider your views on a motion or an application, then you or your attorney must

- (a) file an answer or objection explaining your position with the bankruptcy clerks’ office at the United States Bankruptcy Court for the Eastern District of Pennsylvania, 900 Market Street., Suite 400, Philadelphia, PA 19107 before the start of the Expedited Hearing on July 6, 2017; or
- (b) appear at the Expedited Hearing on July 6, 2017 and either
 - i. file an answer or objection explaining your position by delivering it to the court, or
 - ii. orally present an answer or objection explaining your position.

If you mail your answer to the bankruptcy clerk’s office for filing, you must mail it early enough so that it will be received on or before the start of the Expedited Hearing on July 6, 2017.

2. If you file an answer or objection with the bankruptcy clerk’s office or with the court at the Expedited Hearing, you must also provide a copy of your answer or objection to the Debtors’ attorneys. You may have it delivered by mail or other means of delivery to the Debtors’ attorneys at the addresses shown below before the date of the Expedited Hearing or you may deliver it to the Debtors’ attorneys at the Expedited Hearing.

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3. If you or your attorney do not take the steps described in paragraphs 1 and 2 above, the court may enter an order granting the relief requested in a motion or application.

4. Copies of the motions and applications that will be heard at the Expedited Hearing are included in the Motion for Expedited Hearing, a copy of which is attached hereto as **Exhibit A**.

5. Unless the court orders otherwise, the hearing will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Federal Rule of Bankruptcy Procedure 9014(d).

Dated: June 30, 2017
Philadelphia, Pennsylvania

/s/ Lawrence G. McMichael

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*Proposed Counsel for the Debtors and Debtors
in Possession*