

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

In re:	:	Chapter 11
	:	
Wordsworth Academy, <i>et al.</i> , ¹	:	Case No. 17- 14463 (AMC)
	:	
Debtors.	:	Jointly Administered
	:	

**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

PLEASE TAKE NOTICE that on June 30, 2017, the above-captioned debtors (the “Debtors”) filed *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* (D.I. 20) and related papers with the Court seeking an entry of Order granting Debtor’s 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 an attorney.

PLEASE TAKE FURTHER NOTICE that on July 6, 2017, the Bankruptcy Court entered the Interim Order and Proposed Final Order (the “Interim Order,” a copy of which is attached hereto).

1. If you do not want the Court to grant the relief sought in the Motion, or if you want the Court to consider your views on the Motion, then on or before **4:00 p.m. on July 24, 2017**, you or your attorney must do all of the following:

(a) file an Objection explaining your position at Clerk’s Office, Room 400, 900 Market Street, Philadelphia, Pennsylvania, 19107. If you mail your Objection to the Bankruptcy Clerk’s Office for filing, you must mail it early enough so that it will be received on or before the date and time stated above; and

(b) mail a copy to the movant’s attorney:

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.

Lawrence G. McMichael, Esquire
Dilworth Paxson LLP
1500 Market St., Suite 3500E
Philadelphia, PA 19102

With a copy to counsel to the DIP Lender:

William J. Burnett, Esquire
Flaster Greenberg, P.C.
1835 Market Street, suite 1050
Philadelphia, PA 19103

2. If you or your attorney do not take the steps described in Paragraphs 1(a) & 1(b) above and attend the hearing, the Court may enter an Order granting relief requested in the Motion.

3. A hearing on the Motion is scheduled to be held before the Honorable Ashely M. Chan, on **July 26, 2017 at 11:00 a.m.** at the United States Bankruptcy Court, Courtroom #5, 900 Market Street, Philadelphia, Pennsylvania 19107.

4. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from Anne M. Aaronson, whose address is below.

5. You may contact the Bankruptcy Clerk's Office at 215-408-2800 to find out whether the hearing has been canceled because no one filed a Response.

Dated: July 7, 2017
Philadelphia, Pennsylvania

/s/ Anne M. Aaronson

DILWORTH PAXSON LLP

Lawrence G. McMichael

Peter C. Hughes

Anne M. Aaronson

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*Proposed Counsel for the Debtors and Debtors
in Possession*