

**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
RELATED TO THE MOTION OF THE DEBTORS FOR ENTRY OF INTERIM AND
FINAL ORDERS: (I) AUTHORIZING THEM TO OBTAIN POST-PETITION
FINANCING FROM SIENA LENDING GROUP LLC PURSUANT TO SECTIONS 363
AND 364 OF THE BANKRUPTCY CODE, (II) AUTHORIZING THEM TO ENTER
INTO THE DEBTOR-IN-POSSESSION LOAN AND SECURITY 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**

PLEASE TAKE NOTICE that on August 23, 2017, the above-captioned debtors (the “Debtors”) filed a Motion For Entry Of Interim And Final Orders: (I) Authorizing Them To Obtain Post-Petition Financing From Siena Lending Group LLC Pursuant To Sections 363 And 364 Of The Bankruptcy Code, (II) Authorizing Them To Enter Into The Debtor-In-Possession Loan And Security 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. 222) 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.

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 **August 29, 2017 by 12:00 p.m.**, you or your attorney must do all of the following:

- a) File an Objection explain your position at Clerk’s Office, Room 400, 900 Market Street, Philadelphia, Pennsylvania, 19107. If you mail your Objection to the

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.

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:

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

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

3. An expedited hearing on the Motion is scheduled to be held before the Honorable Ashely M. Chan, on **August 30, 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 Lawrence G. McMichael, whose address is below.

5. You may contact the Bankruptcy Clerk's Office at 215-408-2800 for hearing information.

Dated: August 24, 2017
Philadelphia, Pennsylvania

/s/ Peter C. Hughes

DILWORTH PAXSON LLP

Lawrence G. McMichael

Peter C. Hughes

Anne M. Aaronson

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Counsel for the Debtors and Debtors in Possession