

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

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

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

PLEASE TAKE NOTICE that Wordsworth Academy (the “Debtors”) has filed its Motion of the Reorganized Debtors for Approval of Escrow Funds Designated as Distributable Cash Under the Plan (the “*Motion*”) and related papers with the Court seeking the entry of an Order Approving Dilworth Paxson LLP as Escrow Agent with Respect to Distributable Cash Under the Debtors’ Confirmed Plan.

- 1. 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).**
- 2. 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 **February 1, 2018** you or your attorney must file a response to the Motion.** (See Instructions on next page.)
- 3. A hearing on the Motion is scheduled to be held before the Honorable Ashely M. Chan, on **February 14, 2018 at 11:00 a.m.** at the United States Bankruptcy Court, Courtroom #5, 900 Market Street, Philadelphia, PA 19107. Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing.**
- 4. If you do not file a response to the Motion, the court may cancel the hearing and enter an order granting the relief requested in the Motion.**
- 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.**
- 6. 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 the attorney whose name and address is listed on the next page of this Notice.**

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<sup>1</sup> 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.

**Filing Instructions**

7. **If you are required to file documents electronically by Local Bankruptcy Rule 5005-1**, you must file your response electronically.
8. **If you are not required to file electronically**, you must file your response at  
  
**United States Bankruptcy Court  
Eastern District Of Pennsylvania  
Clerk's Office  
900 Market Street, Suite 400  
Philadelphia, Pa 19107**
9. **If you mail your response** 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 stated in Paragraph 2 on the previous page of this Notice.
10. On the same day that you file or mail your Response to the Motion, you must mail or deliver a copy of the Response to the movant's attorney:

Peter C. Hughes, Esquire  
Dilworth Paxson, LLP  
1500 Market Street, Suite 3500E  
Philadelphia, PA 19102  
(215) 575-7000  
(215) 757-7200 (fax)  
[phughes@dilworthlaw.com](mailto:phughes@dilworthlaw.com)

Dated: January 11, 2018  
Philadelphia, Pennsylvania

/s/ Peter C. Hughes

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**DILWORTH PAXSON LLP**

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*Counsel for the Debtors and Debtors in  
Possession*