

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MISSOURI

In re:	)	
	)	
JOHN FITZGIBBON MEMORIAL	)	Case No. 26-40689-11
HOSPITAL, INC., <i>et al.</i> ,	)	
	)	
	)	Chapter 11
Debtors.	)	(Jointly Administered)

**STIPULATION EXTENDING DEBTORS' USE OF CASH COLLATERAL AND
REQUEST FOR CONTINUANCE OF STATUS CONFERENCE REGARDING DIP
LENDER'S REMEDIES NOTICE, EXPEDITED STAY RELIEF HEARING AND
DETERMINATION OF DEFAULT**

UMB Bank, N.A., in its capacity as Master Trustee and Bond Trustee and as debtor-in-possession lender (the “**DIP Lender**”) and Debtors file this Stipulation extending Debtors’ use of Cash Collateral¹ through 11:59 p.m. CT on September 18, 2026 under the same terms and conditions as set forth in the Final DIP Order, and further request the Court continue the Status Conference set for 1:00 p.m. CT on September 9, 2026 to Thursday September 17, 2026 at 1:30 p.m. CT. In support of this Stipulation, DIP Lender and Debtors respectfully state as follows:

1. On September 1, 2026, DIP Lender filed its *Remedies Notice Declaring DIP Facility Termination Event, Accelerating DIP Obligations, Terminating DIP Facility, and Imposing Default Interest* (Doc. 374) (the “**Remedies Notice**”).
2. On that same date, DIP Lender filed its *Emergency Motion for Expedited Stay Relief Hearing and Determination of Event of Default* (Doc. 376) (the “**Stay Relief Motion**”).
3. The DIP Lender’s Remedies Notice and Stay Relief Motion were filed due to the sale of substantially all of Debtors’ assets not closing by the August 31, 2026 milestone required under the Final DIP Order.

¹ Capitalized terms used herein and not otherwise defined shall have the same meaning given to them in the Court’s *Order of the Court Agreed Final Order (I) Authorizing Secured Postpetition Financing on a Superpriority Basis, (II) Authorizing Use of Cash Collateral, And (C) Grant Liens and Provide Administrative Expense Claims; AND (III) Granting Adequate Protection* (Doc. 312) (the “**Final DIP Order**”).

4. The sale contemplated by the Final DIP Order closed on September 8, 2026. *See* Doc. 402—Debtors’ Notice Regarding Occurrence of Closing Date filed September 8, 2026.

5. A continued status conference on the Remedies Notice and Stay Relief Hearing is scheduled for September 9, 2026 at 1:00 p.m. CT.

6. Notwithstanding DIP Lender’s rights under the Remedies Notice and the Stay Relief Motion, in consultation with Debtors’ counsel, DIP Lender has agreed to allow the Debtors to use Cash Collateral in accordance with the budget included in the Final DIP Order through 11:59 p.m. on September 18, 2026 to provide additional time for the parties to assess Debtors’ financial situation and options for resolving the Remedies Notice and Stay Relief Motion.

WHEREFORE, DIP Lender and Debtors respectfully request that the Court continue the status conference set for 1:00 p.m. CT on September 9, 2026 to September 17, 2026 at 1:30 p.m. CT.

Dated: September 9, 2026

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on September 9, 2026, a true and correct copy of the foregoing was served through the Court's CM/ECF system upon all parties registered to receive electronic notice and was delivered by USPS First-Class Mail, prepaid and email to the following:

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