

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

In re)	
)	Chapter 11
LAVIE CARE CENTERS, LLC, <i>et al.</i> ¹)	Case No. 24-55507-PMB
)	
Debtors.)	(Jointly Administered)

**MOTION OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
FOR RULE 2004 EXAMINATIONS**

The Official Committee of Unsecured Creditors (the “Committee”) of the above-captioned debtors and debtors-in-possession (the “Debtors”), by and through its proposed undersigned counsel, hereby moves (this “Motion”), pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), for entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), authorizing and directing the 2004 Examinees (defined below) to produce documents, communications, and information within their respective possession, custody, or control that are responsive to the document requests set forth on Exhibit 1 to the Proposed Order (the “2004 Requests”). In support of this Motion, the Committee respectfully states as follows:

RELIEF REQUESTED

1. The Committee seeks entry of the Proposed Order authorizing and directing the below-listed entities (the “2004 Examinees”) to produce all documents, communications, and

¹ The last four digits of LaVie Care Centers, LLC’s federal tax identification number are 5592. There are 282 Debtors in these chapter 11 cases, which are being jointly administered for procedural purposes only. A complete list of the Debtors and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://www.kccllc.net/LaVie>. The location of LaVie Care Centers, LLC’s corporate headquarters and the Debtors’ service address is 1040 Crown Pointe Parkway, Suite 600, Atlanta, GA 30338.



information within their respective possession, custody, or control that are responsive to the 2004

Requests:

2004 Examinees
Parkview KY Opco, LLC
SRZ OP Ashton LLC
BRIDGEWALK ON HARDEN HEALTH AND REHABILITATION, LLC
Winter Haven FL Opco, LLC
Lakeview SNF Operations LLC
Vero Beach Operations, LLC
Palm Springs SNF Operations LLC
NEW PORT RICHEY OPCO, LLC
Franco SNF Operations LLC
BRANDON HEALTH OPCO, LLC
Lake Parker SNF Operations LLC
Melbourne Opco LLC
Pensacola Opco LLC
Bayonet Opco, LLC
Kissimmee Opco LLC
Sarasota Opco, LLC
West Altamonte Opco, LLC
Port Charlotte Opco, LLC
PAVA PA OPCO LLC
Somerset Senior Living Operating Company LLC
Parks Operating LLC

2004 Examinees
Lecanto FL Opco LLC
Melbourne FL Opco LLC
WEST DONEGAN AVE ALF OPCO LLC
SAN JOSE BLVD OPCO LLC
COUNTRYSIDE BLVD OPCO LLC
Deltona Operating LLC
SOUTH TUTTLE AVE OPCO LLC
WEST FLETCHER AVE OPCO LLC
13th Street OPCO LLC
MIAMI ROAD OPCO LLC
Albee Farm Road Opco LLC
WEST DONEGAN AVE SNF OPCO LLC
Wedgewood Operating LLC
Bryan Dairy Road Opco LLC
Island Operating LLC
NW 10TH PLACE OPCO LLC
Reed Canal Road Opco LLC
Vista Manor Operating LLC
West Colonial Drive Opco LLC
13th Road OPCO LLC
Shore Drive OPCO LLC
Pondella Road OPCO LLC
Southpoint Drive East OPCO LLC

2004 Examinees
Dr MLK Street OPCO LLC
Park Boulevard OPCO LLC
Oak Street OpCo LLC
Marshall Drive OPCO LLC
Hillcrest Opco LLC
Santa Barbara Blvd Opco LLC
Hillview Drive Opco LLC
Drury Lane Opco LLC
Evans Avenue Opco LLC
North Brentwood Circle Opco LLC
Ginger Drive Opco LLC
Palm Coast Pkwy Opco LLC
NE 2nd Street Opco LLC
Rio Opco LLC
Habana Way Opco LLC
Wallis Road Opco LLC
Phillips Street Opco LLC
1059 Virginia St Opco LLC
6305 Cortez Rd W Opco LLC
1465 Oakfield Dr Opco LLC
1445 Howell Ave Opco LLC
626 N Tyndall Pkwy Opco LLC
710 N Sun Dr Opco LLC

2004 Examinees
500 Hospital Dr Opco LLC
5405 Babcock St NE Opco LLC
541 Old Canoe Creek Rd Opco LLC
3920 Rosewood Way Opco LLC
1061 Virginia St Opco LLC
12170 Cortez Blvd Opco LLC
743 S Beneva Rd Opco LLC
743 S Beneva Rd Opco LLC
702 S Kings Ave Opco LLC
2939 S Haverhill Rd Opco LLC
1215 Kingsley Ave Opco LLC
2575 Airline Drive OpCo LLC d/b/a Heritage Manor Health & Rehab
2000 FRANK SNF, LLC d/b/a Heritage Manor of Ferriday
2000 FRANK SNF, LLC d/b/a Fair City Health and Rehab
4405 Airline Drive OpCo LLC d/b/a Adira Health & Rehab
Baya Pointe SNF Operations LLC
Floridean SNF Operations LLC
Alexandria Operator, LLC
Southampton Operator, LLC
Fork Union SNF Operations LLC
Chelsea Operator, LLC
Lawrenceville SNF Operations LLC
Westover Hills SNF Operations LLC

2004 Examinees
Staunton SNF Operations LLC
Williamsburg SNF Operations LLC
Winchester SNF Operations LLC
Belmont Bay Operator, LLC
Osprey SNF Operations LLC

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the Northern District of Georgia, Atlanta Division (the “Court”) has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b). Venue of these cases and the Motion in this District is proper under 28 U.S.C. §§ 1408 and 1409.

3. The legal predicates for the relief requested herein are sections 105(a) of title 11 of the United States Code (the “Bankruptcy Code”) and Bankruptcy Rules 2004.

BACKGROUND

4. On June 2, 2024 and June 3, 2024 (together, the “Petition Dates”), the Debtors filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code, initiating the above-captioned chapter 11 cases (the “Chapter 11 Cases”) The Debtors remain in possession of their property and continue to operate their business as debtors-in-possession in accordance with Sections 1107 and 1108 of the Bankruptcy Code.

5. On June 3, 2024, the Court entered orders authorizing the joint administration and procedural consolidation of the Chapter 11 Cases.

6. On June 13, 2024, the Office of the United States Trustee organized the Committee and appointed its members.

7. As is explained in greater depth in the *Declaration of M. Benjamin Jones in Support of Chapter 11 Petitions and First Day Pleadings* [Docket No. 17] (the “First Day Declaration”), the Debtors are in the business of operating skilled nursing and independent living facilities (“Facilities”). Prior to the Petition Dates, the Debtors divested from multiple Facilities—the Debtors operated approximately 140 Facilities in 2020, approximately 114 as of June 2023, and only 43 as of the Petition Dates. *See* First Day Declaration at ¶ 12. This divestiture, which was part of series of strategic alternatives to bankruptcy and which was undertaken with the support of the Debtors’ landlords, including Omega, did not generate enough liquidity to cover May 2023 rent due to Omega and, of course, did not ultimately prevent the Debtors from filing for chapter 11 relief. *See id.*, at ¶¶ 69-72.

8. Despite the failure of the Debtors’ divestiture of certain Facilities to prevent the filing of the Chapter 11 Cases, and given that the Debtors have provided little to no detail surrounding the various transactions connected to the transfer of its Facilities, the Committee seeks further information regarding such transfers from the 2004 Examinees, each of which is a transferee of one or more Facility. The Committee’s goal in pursuing the 2004 Requests is to determine whether any value to the estates was lost in the Debtors’ mass divestiture, whether such value may be recovered for the benefit of creditors, and whether the conduct surrounding such transactions gives rise to claims that can be pursue on behalf of creditors.

BASIS FOR RELIEF REQUESTED

9. Bankruptcy Rule 2004 provides, in pertinent part, that upon the motion of any party in interest, “the court may order the examination of any entity.” FED. R. BANKR. P. 2004(a). The scope of the examination is far reaching. Pursuant to Bankruptcy Rule 2004(b), the examination “may relate . . . to the acts, conduct or property . . . of the debtor, or to any matter which may affect

the administration of the debtor’s estates” FED. R. BANKR. P. 2004(b). Indeed, “Rule 2004 examinations and requests for production are necessarily broad to serve the primary purpose of revealing the nature and extent of a bankruptcy estate, discovering assets, examining transactions, and determining whether wrongdoing has occurred.” *In re 3 Kings Constr. Residential LLC*, No. 22-10965-PMB, 2024 Bankr. LEXIS 1169, at *4 (Bankr. N.D. Ga. May 17, 2024); *see also In re Stewart*, No. 5:95-CV-235-4(DF), 1995 U.S. Dist. LEXIS 22333, at *4-5 (M.D. Ga. June 7, 1995) (noting that Rule 2004 examinations are meant to be a “fishing expedition” and as “exploratory and groping as appears proper”, in contrast to discovery under FED. R. CIV. P. 26(c)) (citing *In re Ionosphere Clubs, Inc.*, 156 B.R. 414, 432 (S.D.N.Y. 1993), *aff’d* 17 F.3d 600 (2nd. Cir. 1994)). Further, this Court is empowered to grant the relief sought in the Motion on an *ex parte* basis, as courts often do with respect to requests under Bankruptcy Rule 2004. *See In re Bennett*, No. 07-77463, 2008 Bankr. LEXIS 1742, at *5 (Bankr. N.D. Ga. Apr. 15, 2008) (“The advisory committee note to Bankruptcy Rule 2004 points out that motions under that rule may be granted *ex parte*.”); *In re M4 Enters.*, 190 B.R. 471, 473 n.2 (Bankr. N.D. Ga. 1995) (“As most practitioners are aware, courts customarily dispose of Rule 2004 motions on an *ex parte* basis.”).

10. Here, the 2004 Requests put forth by the Committee fall well within the broad ambit of what is appropriate under Bankruptcy Rule 2004. The 2004 Requests are aligned with the Committee’s mandate to investigate in these Chapter 11 Cases potential claims involving prepetition conduct to obtain the best possible recovery for all unsecured creditors. To pursue this necessary investigation into potential claims, the Committee seeks the information requested in the 2004 Requests to shed light on the prepetition transfers of certain of the Debtors’ Facilities. Such information may reveal potential claims, such as claims for fraudulent transfer or theories of successor liability vis-à-vis the transferees of such Facilities. Absent access to the information

sought in the 2004 Requests, the Committee cannot adequately pursue all avenues of recovery for unsecured creditors—in violation of its fiduciary duties.

11. Indeed, the Committee submits its must pursue production of the information sought in the 2004 Requests to adequately carry out its obligations as fiduciaries to the estate. As a threshold matter, as an estate fiduciary, the Committee can obtain such information:

A committee . . . may

...

(2) investigate the acts, conduct, assets, liabilities, and financial condition of the debtor, the operation of the debtor's business and the desirability of the continuance of such business, and *any other matter relevant to the case* or to the formulation of a plan.

11 U.S.C. § 1103(c) (emphasis added).

12. The 2004 Requests seek information that may be the source of significant recovery for unsecured creditors, the absence of which would significantly limit the Committee's ability to conduct a comprehensive investigation into prepetition conduct. Accordingly, the Committee submits that it is entitled to investigate and otherwise obtain the information sought by the 2004 Requests to fulfill its fiduciary obligations.

13. As the 2004 Requests are related to transactions by the 2004 Examinees, they should possess the information sought by such requests. Accordingly, this Motion seeking the 2004 Examinees' production of the information contained in the 2004 Requests is both reasonable and appropriate.

RESERVATION OF RIGHTS

14. The Committee reserves all rights to request, pursuant to Bankruptcy Rule 2004 or otherwise, additional documents or an examination upon review of the documents produced in connection with this Motion or otherwise

CONCLUSION

WHEREFORE, the Committee respectfully requests that the Court grant the Motion and enter the Proposed Order and grant such further relief as is just and appropriate.

Dated: July 26, 2024

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*Proposed Counsel for the Official Committee of
Unsecured Creditors*

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

)	
In re)	Chapter 11
)	
LAVIE CARE CENTERS, LLC, <i>et al.</i> ¹)	Case No. 24-55507-PMB
)	
Debtors.)	(Jointly Administered)
)	
)	Related to Docket No. ____
)	

**ORDER GRANTING THE MOTION OF THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR RULE 2004 EXAMINATIONS**

The Motion of the Committee of Unsecured Creditors (the “Movant”) for an order pursuant to Federal Rule of Bankruptcy Procedure 2004 to take discovery and conduct an examination of

¹ The last four digits of LaVie Care Centers, LLC’s federal tax identification number are 5592. There are 282 Debtors in these chapter 11 cases, which are being jointly administered for procedural purposes only. A complete list of the Debtors and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://www.kccllc.net/LaVie>. The location of LaVie Care Centers, LLC’s corporate headquarters and the Debtors’ service address is 1040 Crown Pointe Parkway, Suite 600, Atlanta, GA 30338.

the 2004 Examinees (as defined in the Motion), filed herein on July 26, 2024 (the “Motion”)² (Docket No. ____), having been read and considered, it is

ORDERED that the Motion be, and the same hereby is, **granted** as follows: pursuant to Fed.R.Bankr.P. 2004(a), the Movant is authorized to proceed with discovery and conduct an examination of each of the 2004 Examinees, in accordance with Fed.R.Bankr.P. 2004(b). It is further

ORDERED that if production of designated documents in connection with said examination, cannot be obtained voluntarily, the Movant may compel such production of documents as stated in Fed.R.Bankr.P. 2004(c) in the manner provided in Fed.R.Bankr.P. 9016, which incorporates the procedure for the issuance of a subpoena as set forth in Federal Rule of Civil Procedure 45. It is further

ORDERED that each of the 2004 Examinees shall timely respond to the 2004 Requests attached hereto as **Exhibit 1** in accordance with Fed.R.Bankr.P. 2004(c). Each of the 2004 Examinees may assert written objections in good faith to the requests as if such requests had been served pursuant to Fed.R.Bankr.P. 7034 and shall produce to the Movant all responsive documents that are not subject to a valid timely asserted objection.

The Clerk is directed to serve a copy of this Order upon counsel for the Debtor, counsel for the Movant, each of the 2004 Examinees, and the United States Trustee.

[END OF DOCUMENT]

² Capitalized terms used but not defined herein shall have the meaning ascribed to them in the Motion.

Prepare and presented by:

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Proposed Counsel for the Official Committee of Unsecured Creditors

EXHIBIT 1

2004 Requests

RULE 2004 DOCUMENT REQUESTS

Definitions

Except as set forth below, all words used in this document request have their ordinary meaning:

“COMMUNICATION” means any transmission, relation, or delivery of things, facts, thoughts or ideas by any means, method, or medium on or by which intelligence or information can be delivered, transported, recorded maintained or retrieved, including telephonic face to face conversation, without limitation, any handwritten, typed, printed, graphic, electric, magnetic or illustrative material of any kind or description, including drafts and final versions, originals and reproductions, signed and unsigned versions, however produced or reproduced, and regardless of whether approved, signed, sent, received, redrafted, prepared by or for, or in the possession, custody or control of the party to whom these requests are propounded or any other person acting or purporting to act on behalf of such party.

“DEBTORS” mean the following 282 entities, each of which are a debtor in a chapter 11 bankruptcy case filed before the Bankruptcy Court for the Northern District of Georgia with the case number for each such case listed next to each DEBTOR:

Debtor	Case No.
LaVie Care Centers, LLC	24-55507
10040 Hillview Road Operations LLC	24-55721
1010 Carpenters Way Operations LLC	24-55558
1026 Albee Farm Road Operations LLC	24-55562
1061 Virginia Street Operations LLC	24-55567
1111 Drury Lane Operations LLC	24-55571
1120 West Donegan Avenue Operations LLC	24-55575
11565 Harts Road Operations LLC	24-55725
12170 Cortez Boulevard Operations LLC	24-55730
125 Alma Boulevard Operations LLC	24-55509
1445 Howell Avenue Operations LLC	24-55577
1465 Oakfield Drive Operations LLC	24-55579
1507 South Tuttle Avenue Operations LLC	24-55583
15204 West Colonial Drive Operations LLC	24-55734
1550 Jess Parrish Court Operations LLC	24-55589

Debtor	Case No.
1615 Miami Road Operations LLC	24-55596
1820 Shore Drive Operations LLC	24-55598
1851 Elkcam Boulevard Operations LLC	24-55605
1937 Jenks Avenue Operations LLC	24-55610
195 Mattie M. Kelly Boulevard Operations LLC	24-55512
216 Santa Barbara Boulevard Operations LLC	24-55514
2333 North Brentwood Circle Operations LLC	24-55624
2401 NE 2nd Street Operations LLC	24-55629
2826 Cleveland Avenue Operations LLC	24-55634
2916 Habana Way Operations LLC	24-55641
2939 South Haverhill Road Operations LLC	24-55645
3001 Palm Coast Parkway Operations LLC	24-55653
3101 Ginger Drive Operations LLC	24-55656
3110 Oakbridge Boulevard Operations LLC	24-55657
3735 Evans Avenue Operations LLC	24-55660
3825 Countryside Boulevard Operations LLC	24-55664
3920 Rosewood Way Operations LLC	24-55675
4200 Washington Street Operations LLC	24-55680
4641 Old Canoe Creek Road Operations LLC	24-55684
500 South Hospital Drive Operations LLC	24-55518
5065 Wallis Road Operations LLC	24-55686
518 West Fletcher Avenue Operations LLC	24-55521
5405 Babcock Street Operations LLC	24-55689
611 South 13th Street Operations LLC	24-55524
626 North Tyndall Parkway Operations LLC	24-55529
6305 Cortez Road West Operations LLC	24-55693
6414 13th Road South Operations LLC	24-55696
650 Reed Canal Road Operations LLC	24-55535
6700 NW 10th Place Operations LLC	24-55700
702 South Kings Avenue Operations LLC	24-55542
710 North Sun Drive Operations LLC	24-55546
741 South Beneva Road Operations LLC	24-55550
777 Ninth Street North Operations LLC	24-55554
7950 Lake Underhill Road Operations LLC	24-55704
9035 Bryan Dairy Road Operations LLC	24-55707
9311 South Orange Blossom Trail Operations LLC	24-55711
9355 San Jose Boulevard Operations LLC	24-55717
Alpha Health Care Properties, LLC	24-55511
Ambassador Rehabilitative Services, LLC	24-55517

Debtor	Case No.
Ashland Facility Operations, LLC	24-55522
Ashton Court HealthCare, LLC	24-55526
Assisted Living at Frostburg Village Facility Operations, LLC	24-55532
Augusta Facility Operations, LLC	24-55536
Augusta Health Care Properties, LLC	24-55540
Baya Nursing and Rehabilitation, LLC	24-55551
Bayonet Point Facility Operations, LLC	24-55555
Bossier HealthCare, LLC	24-55559
Brandon Facility Operations, LLC	24-55563
Brentwood Meadow Health Care Associates, LLC	24-55568
Briley Facility Operations, LLC	24-55572
Canonsburg Property Investors, LLC	24-55588
Capital Health Care Associates, LLC	24-55593
Cardinal North Carolina HealthCare, LLC	24-55600
Carey Facility Operations, LLC	24-55606
Cary HealthCare, LLC	24-55612
Catalina Gardens Health Care Associates, LLC	24-55616
Catalina Health Care Associates, LLC	24-55620
Centennial Acquisition Corporation	24-55630
Centennial Employee Management, LLC	24-55635
Centennial Five Star Master Tenant, LLC	24-55640
Centennial HealthCare Corporation	24-55504
Centennial HealthCare Holding Company, LLC	24-55647
Centennial HealthCare Investment Corporation	24-55651
Centennial HealthCare Management Corporation	24-55655
Centennial HealthCare Properties Corporation	24-55659
Centennial HealthCare Properties, LLC	24-55670
Centennial Management Investment, LLC	24-55673
Centennial Newco Holding Company, LLC	24-55687
Centennial Professional Therapy Services Corporation	24-55690
Centennial Service Corporation - Grant Park	24-55703
Chenal HealthCare, LLC	24-55712
Cheswick Facility Operations, LLC	24-55718
CHIC Holding Company, LLC	24-55723
CHMC Holding Company, LLC	24-55727
CHPC Holding Company, LLC	24-55733
Clay County HealthCare, LLC	24-55737
Coastal Management Investment, LLC	24-55747
Consulate EV Acquisition, LLC	24-55750

Debtor	Case No.
Consulate EV Master Tenant, LLC	24-55752
Consulate EV Operations I, LLC	24-55754
Consulate Facility Leasing, LLC	24-55508
Consulate Management Company III, LLC	24-55516
Consulate MZHBS Leaseholdings, LLC	24-55520
Consulate NHCG Leaseholdings, LLC	24-55523
Country Meadow Facility Operations, LLC	24-55527
Crestline Facility Operations, LLC	24-55533
Cypress Manor Health Care Associates, LLC	24-55538
Cypress Square Health Care Associates, LLC	24-55543
D.C. Medical Investors Limited Partnership	24-55547
Donegan Square Health Care Associates, LLC	24-55561
Down East HealthCare, LLC	24-55566
Edinburgh Square Health Care Associates, LLC	24-55570
Emerald Ridge HealthCare, LLC	24-55580
Envoy Health Care, LLC	24-55585
Envoy Management Company, LLC	24-55590
Envoy of Alexandria, LLC	24-55594
Envoy of Denton, LLC	24-55601
Envoy of Forest Hills, LLC	24-55604
Envoy of Fork Union, LLC	24-55611
Envoy of Goochland, LLC	24-55615
Envoy of Lawrenceville, LLC	24-55618
Envoy of Norfolk, LLC	24-55622
Envoy of Pikesville, LLC	24-55625
Envoy of Richmond, LLC	24-55628
Envoy of Somerset, LLC	24-55633
Envoy of Staunton, LLC	24-55638
Envoy of Williamsburg, LLC	24-55643
Envoy of Winchester, LLC	24-55649
Envoy of Woodbridge, LLC	24-55652
Epsilon Health Care Properties, LLC	24-55668
Ferriday HealthCare, LLC	24-55672
FLLVMT, LLC	24-55677
Florida Health Care Properties, LLC	24-55683
Floridian Facility Operations, LLC	24-55714
Forrest Oakes HealthCare, LLC	24-55726
Franklinton HealthCare, LLC	24-55732
Frostburg Facility Operations, LLC	24-55739

Debtor	Case No.
Garden Court HealthCare, LLC	24-55743
Gateway HealthCare, LLC	24-55746
Genoa Healthcare Consulting, LLC	24-55749
Genoa Healthcare Group, LLC	24-55756
Glenburney HealthCare, LLC	24-55761
Grant Park Nursing Home Limited Partnership	24-55762
Grayson Facility Operations, LLC	24-55764
Green Cove Facility Operations, LLC	24-55767
Greenfield Facility Operations, LLC	24-55769
Harbor Pointe Facility Operations, LLC	24-55772
HFLVMT, LLC	24-55773
Hilltop Mississippi HealthCare, LLC	24-55776
Hollywell HealthCare, LLC	24-55510
Hunter Woods HealthCare, LLC	24-55519
Jacksonville Facility Operations, LLC	24-55531
Jennings HealthCare, LLC	24-55534
Josera, LLC	24-55539
Kannapolis HealthCare, LLC	24-55544
Kenton Facility Operations, LLC	24-55552
Kenwood View HealthCare, LLC	24-55556
Kings Daughters Facility Operations, LLC	24-55564
Kissimmee Facility Operations, LLC	24-55569
Lake Parker Facility Operations, LLC	24-55574
Lakeland Facility Operations, LLC	24-55576
Legends Facility Operations, LLC	24-55581
Level Up Staffing, LLC	24-55586
Lidenskab, LLC	24-55595
Lincoln Center HealthCare, LLC	24-55599
Locust Grove Facility Operations, LLC	24-55602
LTC Insurance Associates, LLC	24-55607
Lucasville I Facility Operations, LLC	24-55613
Lucasville II Facility Operations, LLC	24-55617
Luther Ridge Facility Operations, LLC	24-55632
LV CHC Holdings I, LLC	24-55639
LV Operations I, LLC	24-55505
LV Operations II, LLC	24-55506
LVE Holdco, LLC	24-55642
LVE Master Tenant 1, LLC	24-55648
LVE Master Tenant 2, LLC	24-55666

Debtor	Case No.
LVE Master Tenant 3, LLC	24-55669
LVE Master Tenant 4, LLC	24-55671
LVFH Master Tenant, LLC	24-55674
LVLUPH, LLC	24-55679
Manor at St. Luke Village Facility Operations, LLC	24-55685
McComb HealthCare, LLC	24-55688
Melbourne Facility Operations, LLC	24-55691
Miami Facility Operations, LLC	24-55695
Montclair HealthCare, LLC	24-55702
Mount Royal Facility Operations, LLC	24-55706
NENC HealthCare Holding Company, LLC	24-55709
New Harmonie HealthCare, LLC	24-55713
New Port Richey Facility Operations, LLC	24-55719
Newport News Facility Operations, LLC	24-55722
Norfolk Facility Operations, LLC	24-55728
North Carolina Master Tenant, LLC	24-55731
North Fort Myers Facility Operations, LLC	24-55736
North Strabane Facility Operations, LLC	24-55740
Oak Grove HealthCare, LLC	24-55744
Oaks at Sweeten Creek HealthCare, LLC	24-55515
Omro HealthCare, LLC	24-55530
Onetete, LLC	24-55537
Orange Park Facility Operations, LLC	24-55545
Osprey Nursing and Rehabilitation, LLC	24-55584
Paloma Blanca Health Care Associates, LLC	24-55592
Parkside Facility Operations, LLC	24-55597
Parkview Facility Operations, LLC	24-55603
Parkview Manor HealthCare, LLC	24-55614
Pavilion at St. Luke Village Facility Operations, LLC	24-55623
Penn Village Facility Operations, LLC	24-55627
Pennknoll Village Facility Operations, LLC	24-55631
Pensacola Facility Operations, LLC	24-55637
Perry Facility Operations, LLC	24-55644
Perry Village Facility Operations, LLC	24-55650
Pheasant Ridge Facility Operations, LLC	24-55661
Piketon Facility Operations, LLC	24-55663
Pine River HealthCare, LLC	24-55667
Pinelake HealthCare, LLC	24-55676
Port Charlotte Facility Operations, LLC	24-55697

Debtor	Case No.
QCPMT, LLC	24-55701
RAC Insurance Investors, LLC	24-55705
Reeders Facility Operations, LLC	24-55710
Retirement Village of North Strabane Facility Operations, LLC	24-55715
Ridgewood Facility Operations, LLC	24-55720
Riley HealthCare, LLC	24-55724
Rispetto, LLC	24-55729
Riverbend HealthCare, LLC	24-55735
Riverview of Ann Arbor HealthCare, LLC	24-55738
Royal Terrace HealthCare, LLC	24-55742
Safety Harbor Facility Operations, LLC	24-55748
Salus Management Investment, LLC	24-55751
Sarasota Facility Operations, LLC	24-55753
Sea Crest Management Investment, LLC	24-55755
Sheridan Indiana HealthCare, LLC	24-55757
Shoreline Healthcare Management, LLC	24-55758
Skyline Facility Operations, LLC	24-55759
Southpoint Health Care Associates, LLC	24-55760
St. Petersburg Facility Operations, LLC	24-55763
Starkville Manor HealthCare, LLC	24-55766
Summit Facility Operations, LLC	24-55770
Susquehanna Village Facility Operations, LLC	24-55774
Swan Pointe Facility Operations, LLC	24-55775
Tallahassee Facility Operations, LLC	24-55777
Tarpon Health Care Associates, LLC	24-55779
Tosturi, LLC	24-55548
Transitional Health Partners	24-55557
Valley View HealthCare, LLC	24-55573
VAPAMT, LLC	24-55578
Vero Beach Facility Operations, LLC	24-55587
VNTG HD Master Tenant, LLC	24-55609
Walnut Cove HealthCare, LLC	24-55621
Wayne HealthCare, LLC	24-55626
Wellington HealthCare, LLC	24-55636
Wellston Facility Operations, LLC	24-55646
West Altamonte Facility Operations, LLC	24-55654
West Palm Beach Facility Operations, LLC	24-55658
Westerville Facility Operations, LLC	24-55662
Westwood HealthCare, LLC	24-55665

Debtor	Case No.
Whispering Hills Facility Operations, LLC	24-55692
Whitehall of Ann Arbor HealthCare, LLC	24-55716
Whitehall of Novi HealthCare, LLC	24-55765
Williamsburg Facility Operations, LLC	24-55771
Willowbrook HealthCare, LLC	24-55781
Wilora Lake HealthCare, LLC	24-55782
Windsor Facility Operations, LLC	24-55783
Winona Manor HealthCare, LLC	24-55784
Winter Haven Facility Operations, LLC	24-55785
Woodbine HealthCare, LLC	24-55786
Woodstock Facility Operations, LLC	24-55787
Ambassador Ancillary Services, LLC	24-55513
Brownsboro Hills HealthCare, LLC	24-55582
Centennial Master Subtenant, LLC	24-55678
Centennial Master Tenant, LLC	24-55682
Centennial SEHC Master Tenant, LLC	24-55699
Charlwell HealthCare, LLC	24-55708
Clearwater HealthCare, LLC	24-55741
Coastal Administrative Services, LLC	24-55745
Hilltopper Holding Corp.	24-55778
Hurstbourne HealthCare, LLC	24-55525
KD HealthCare, LLC	24-55549
Kimwell HealthCare, LLC	24-55560
Libby HealthCare, LLC	24-55591
MA Healthcare Holding Company, LLC	24-55681
Milton HealthCare, LLC	24-55698
Parkview HealthCare, LLC	24-55608
Parkwell HealthCare, LLC	24-55619
Pinewood HealthCare, LLC	24-55694
Stratford Facility Operations, LLC	24-55768
THS Partners I, Inc.	24-55780
THS Partners II, Inc.	24-55528
Transitional Health Services, Inc.	24-55565

For the avoidance of doubt, a “DEBTOR” means one of the foregoing 282 entities.

“DOCUMENT” and “DOCUMENTS” are used in their broadest sense and mean (1) the originals and any nonidentical copies (whether different from the originals because of notations made on such

copies or otherwise) of all “writings,” “recordings,” and “photographs” as those terms are defined in Rule 1001 of the Federal Rules of Evidence and (2) physical documents, electronic documents and documents created or stored by any means. This includes, but is not limited to, any written, graphic or otherwise recorded matter however created whether inscribed or stored by hand or by mechanical, electronic, microfilm, photogenic or phonic means or by any other means including abstracts, address books, agreements, analyses of any kind, appointment books, architectural blueprints and drawings, bids, billings, blueprints, books of account, brochures, calendars, audio and video cassettes, charts, circulars, compilations, computer runs and printouts, computer files and programs, consultant’s reports and studies, contracts, correspondence, desk calendars, diagrams, diaries, dictionaries, disks, diskettes, drawings, e-mail, estimates, electronic mail, electronic data of any kind, electronic records of any kind, expense account records, expert’s reports or studies, financial statements or calculations, floppy disks, flyers, graphs, house publications, inspection records, sheets and reports, inter-office or intraoffice communications, invoices, job descriptions or assignments, layouts, leaflets, ledgers, letters, licenses, lists, mailings, manuals, maps, memoranda of any kind, microfilm, minutes or records of any kind, movies, notes, notebooks, opinions, organizational charts, tables and lists, pamphlets, permits, photographs, pictures, plans, projections, promotional materials, press releases or clippings, publications, procedures, quotations, records and recordings of any kind, renderings, reports of any kind, rework instructions, orders and procedures, schedules, scripts, sketches, slide programs, specifications, statistical analyses, stenographers notebooks, studies of any kind, subcontracts, summaries, tabulations, tallies, tapes, telegrams, teletype messages, telephone logs, timesheets, undertakings, videotapes, vouchers, working drawings, papers and files.

“FACILITY” shall mean a skilled nursing and independent living facility owned and/or operated by any of the DEBTORS that YOU purchased or was otherwise transferred to YOU and, where

applicable, any assets that YOU purchased or were otherwise transferred to YOU in connection with the purchase or transfer of any such FACILITY.

“OMEGA” shall mean Omega Healthcare Investors, Inc. and any affiliates thereof.

“REAL PROPERTY” shall mean the real property on which each FACILITY operates and all improvements thereto.

“REGARDING” shall have the same meaning as relate, refer, referring to, related to, evidence, evidencing, and constitute and includes referring to, recording, reflecting, supporting, interpreting, prepared in connection with, used in preparation for, pertaining to, mentioning, having any relationship to, or being in any way legally, logically, or factually connected with the matter discussed, in whole or in part.

“SYNERGY” shall mean: (i) Pourlessoins, LLC d/b/a Synergy Healthcare Services; (ii) Zomleben, LLC d/b/a Synergy Healthcare Solutions; or (iii) any affiliate thereof.

“YOU” and “YOUR” means you, any entity that you own an equity interest in or that owns an equity interest in you, or any entity that you manage, and all of your predecessors, successors, or affiliates and all of your attorneys and all other agents or representatives of any kind.

Instructions

1. Except where otherwise stated, the requests are for DOCUMENTS and COMMUNICATIONS related to the time period starting January 1, 2019 through and including the present day.

2. In producing these DOCUMENTS and COMMUNICATIONS, YOU are required to furnish all DOCUMENTS and COMMUNICATIONS in YOUR possession, ownership, custody or control, actual or constructive.

3. The DOCUMENTS and COMMUNICATIONS produced in response to this request must not be redacted or altered in any manner.

4. The DOCUMENTS and COMMUNICATIONS produced in response to this request shall be segregated and clearly marked or labeled as to the specific request to which such DOCUMENTS and COMMUNICATIONS are responsive and are being produced. Otherwise, such DOCUMENTS and COMMUNICATIONS shall be produced as they are kept in the usual course of business, including the production of the files from which such DOCUMENTS and COMMUNICATIONS are taken.

5. If any of these DOCUMENTS and COMMUNICATIONS cannot be produced in full, YOU are requested to produce them to the fullest extent possible, specifying clearly the reasons for YOUR inability to produce the remainder and stating whatever information, knowledge, or belief YOU have concerning the unproduced DOCUMENTS and COMMUNICATIONS.

6. If any of the DOCUMENTS and COMMUNICATIONS requested were at one time in existence, but no longer are, so state and specify for each DOCUMENT and COMMUNICATIONS: (a) the type of DOCUMENT or COMMUNICATIONS, (b) the type of information once contained therein, (c) the date upon which it ceased to exist, (d) the circumstance under which it ceased to exist, (e) the identity of all persons having knowledge of the circumstances under which it ceased to exist and (f) the identify of all persons having knowledge or who had knowledge of the contents thereof.

7. YOU shall respond to these document requests no later than 30 days from the entry of the order of the Bankruptcy Court for the Northern District of Georgia approving such requests

pursuant to Fed. R. Bankr. P. 2004. All responses to these requests shall be provided to the proposed counsel to the Committee of Unsecured Creditors, as set forth below:

Pierce E. Rigney
600 Peachtree Street, NE, Suite 3000
Atlanta, GA 30308
Email: pierce.rigney@troutman.com

-and-

Francis J. Lawall
3000 Two Logan Square
Eighteenth and Arch Streets
Philadelphia, PA 19103-2799
Email: francis.lawall@troutman.com

-and-

Mathew R. Brooks
Deborah Kovsky-Apap
875 Third Avenue
New York, NY 10022
Email: matthew.brooks@troutman.com
deborah.kovsky@troutman.com

Document Requests

1. For each FACILITY that YOU purchased or was otherwise transferred to YOU, any and all COMMUNICATIONS and DOCUMENTS regarding the valuation of such FACILITY both before and after the purchase or transfer of such FACILITY.

2. For each FACILITY that YOU purchased or was otherwise transferred to YOU, any and all COMMUNICATIONS and DOCUMENTS regarding the financial performance of such FACILITY both before and after the purchase or transfer of such FACILITY.

3. For each FACILITY that YOU purchased or was otherwise transferred to YOU, any and all COMMUNICATIONS and DOCUMENTS regarding the purchase or transfer of such

FACILITY, including, but not limited to, the documents effecting the transaction through which the FACILITY was transferred from any of the DEBTORS to YOU.

4. For each FACILITY that YOU purchased or was otherwise transferred to YOU, any and all COMMUNICATIONS and DOCUMENTS regarding consideration (whether cash or otherwise) paid by YOU for the purchase or transfer of such FACILITY, whether to any of the DEBTORS, to OMEGA, or otherwise.

5. For each FACILITY that YOU purchased or was otherwise transferred to YOU, DOCUMENTS sufficient to disclose the identity of the individuals involved in the negotiations for the purchase or transfer of such FACILITY, whether affiliated with YOU, any of the DEBTORS, OMEGA, or otherwise.

6. For each FACILITY that YOU purchased or was otherwise transferred to YOU, any and all COMMUNICATIONS and DOCUMENTS regarding any confidentiality restrictions related to such purchase or transfer, including without limitation informal confidentiality requests or agreements.

7. For each FACILITY that YOU purchased or was otherwise transferred to YOU, any and all COMMUNICATIONS and DOCUMENTS regarding the ownership of the FACILITY, including indirect ownership of the FACILITY, both prior to and following the purchase or transfer of such FACILITY, and including, but not limited to, any COMMUNICATIONS and DOCUMENTS indicating whether any entities in the current post-transfer ownership structure of such FACILITY (whether directly or indirectly) is affiliated in any way with any of the DEBTORS.

8. For each FACILITY that YOU purchased or was otherwise transferred to YOU, any and all COMMUNICATIONS and DOCUMENTS regarding the management of the such

FACILITY, including the identities of individuals in management positions, both prior to and following the purchase or transfer of such FACILITY.

9. For each FACILITY that YOU purchased or was otherwise transferred to YOU, any and all COMMUNICATIONS and DOCUMENTS regarding the employees working at such FACILITY, including employee or personnel lists, both prior to and following the purchase or transfer of such FACILITY.

10. For each FACILITY that YOU purchased or was otherwise transferred to YOU, any and all COMMUNICATIONS and DOCUMENTS regarding the residents living at such FACILITY, including lists of residents, both prior to and following the purchase or transfer of such FACILITY.

11. For each FACILITY that YOU purchased or was otherwise transferred to YOU, any and all COMMUNICATIONS and DOCUMENTS regarding any and all federal or state licenses, permits or certificates of need held by any of the DEBTORS in connection with operation of such FACILITY.

12. For each FACILITY that YOU purchased or was otherwise transferred to YOU, any and all COMMUNICATIONS and DOCUMENTS regarding any and all federal or state licenses or permits held by YOU in connection with operation of such FACILITY, including any and all COMMUNICATIONS and DOCUMENTS regarding YOUR operation of such FACILITY using any federal or state licenses, permits or certificates of need held by any of the DEBTORS or in the name of any of the DEBTORS.

13. For each FACILITY that YOU purchased or was otherwise transferred to YOU, any and all COMMUNICATIONS and DOCUMENTS regarding the name under which YOU

conduct business at the FACILITY and hold YOURSELF out to third parties in connection with the FACILITY.

14. For each FACILITY that YOU purchased or was otherwise transferred to YOU, any and all COMMUNICATIONS and DOCUMENTS regarding the name under which any of the DEBTORS conducted business and the FACILITY and held themselves out to third parties in connection with the FACILITY prior to such sale or transfer.

15. For each FACILITY that YOU purchased or was otherwise transferred to YOU, any and all COMMUNICATIONS and DOCUMENTS regarding the contact information through which YOU conduct business at the FACILITY, including any and all email addresses, websites, and phone numbers.

16. For each FACILITY that YOU purchased or was otherwise transferred to YOU, any and all COMMUNICATIONS and DOCUMENTS regarding the contact information through which any of the DEBTORS conducted business and the FACILITY prior to such sale or transfer, including any and all email addresses, websites, and phone numbers.

17. For each FACILITY that YOU purchased or was otherwise transferred to YOU, any and all COMMUNICATIONS and DOCUMENTS regarding services provided to the DEBTORS by SYNERGY related to the FACILITY prior to such purchase or transfer.

18. Any and all COMMUNICATIONS and DOCUMENTS regarding any services provided to YOU by, or any contractual or business relationship YOU have with, any affiliate of the Debtors, including but not limited to SYNERGY, regardless of whether in connection with a FACILITY that YOU purchased or was otherwise transferred to YOU.

19. For each FACILITY that YOU purchased or was otherwise transferred to YOU, any and all COMMUNICATIONS and DOCUMENTS regarding any ongoing business or contractual relationship between YOU and any of the DEBTORS with respect to such FACILITY.

20. For each FACILITY that YOU purchased or was otherwise transferred to YOU, any and all COMMUNICATIONS and DOCUMENTS regarding any lease agreement YOU entered into related to such FACILITY, whether with OMEGA or otherwise, and including, but not limited to, the operative DOCUMENTS effecting such new lease agreements.

21. For each FACILITY that YOU purchased or was otherwise transferred to YOU, any and all COMMUNICATIONS and DOCUMENTS regarding any pending, threatened, or potential litigation involving any of the DEBTORS related to such FACILITY prior to the purchase or transfer of such FACILITY.

22. For all REAL PROPERTY that YOU purchased, any and all COMMUNICATIONS and DOCUMENTS regarding the purchase of such REAL PROPERTY, including, but not limited to, the documents effecting the transaction through which the REAL PROPERTY was transferred from the prior owner(s) to YOU.

23. For all REAL PROPERTY that YOU purchased, any and all COMMUNICATIONS and DOCUMENTS regarding the valuation of such REAL PROPERTY both before and after the purchase of such REAL PROPERTY.

24. DOCUMENTS sufficient to show all holders of direct or indirect equity, membership, or ownership interests in YOU and the percentage ownership of such holders.

CERTIFICATE OF SERVICE

I hereby certify that on July 26, 2024, all ECF participants registered in this case were served electronically with the *Motion of the Official Committee of Unsecured Creditors for Rule 2004 Examinations* (the "Motion") through the Court's ECF system at their respective email addresses registered with the Court.

I further certify that on July 26, 2024, I caused a true and correct copy of the Motion to be served by first class mail to the entities on the service list attached here to as **Exhibit I**.

/s/ Pierce E. Rigney

Pierce E. Rigney (GA ID No. 656946)
Troutman Pepper Hamilton Sanders LLP
600 Peachtree Street, NE, Suite 3000
Atlanta, GA 30308
Telephone: (404) 885-3901
Email: pierce.rigney@troutman.com

*Proposed Counsel to the Official Committee of
Unsecured Creditors*

SERVICE BY FIRST CLASS MAIL

Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip
Counsel to American Federation of State, County & Municipal Employees, AFL-CIO (AFSCME)	American Federation of State, County & Municipal Employees, AFL-CIO	Matthew Stark Blumin, Office of General Counsel	1101 17th Street NW, Suite 900			Washington	DC	20036
Creditors Committee Member / Top 30 Creditor	Amidon Nurse Staffing, LLC	Eli Schick	1732 Kingsley Avenue, Suite 1			Orange Park	FL	32073
Creditors Committee Member / Top 30 Creditor	Amidon Nurse Staffing, LLC		PO Box 436			Malverne	NY	11565
Creditors Committee Member / Counsel for Claimants and Interested Parties	Anthony and Partners, LLC	John Anthony	100 S. Ashley Drive, Suite 1600			Tampa	FL	33602
Counsel to Jacksonville Nursing Home, Ltd.	Baker Donelson Bearman Caldwell & Berkowitz, PC	Kathleen G Furr	3414 Peachtree Road, N.E., Suite 1500	Monarch Plaza		Atlanta	GA	30326
Counsel to Empirian Health, LLC	Burr & Forman LLP	Derek F Meek	420 North 20th Street, Suite 3400			Birmingham	AL	35203
Counsel to Healthcare Services Group, Inc.	Burr & Forman LLP	Graham H Stieglitz	1075 Peachtree Street, N.E., Suite 3000			Atlanta	GA	30309
Creditors Committee Member	CBD Services USA, LLC	Sidney Robert Bradley	3707 W. Jetton Avenue			Tampa	FL	33629
Centers for Medicare & Medicaid Services	Centers for Medicare & Medicaid Services		7500 Security Blvd			Baltimore	MD	21244
Counsel to the Debtors' Proposed DIP Lenders (TIX 33433 LLC)	DLA Piper LLP (US)	Attn James Muenker	1900 N Pearl St, Suite 2200			Dallas	TX	75201
Counsel to the Debtors' Proposed DIP Lenders (TIX 33433 LLC)	DLA Piper LLP (US)	Attn Kira Mineroff	1251 Avenue of the Americas			New York	NY	10020
Counsel to the Debtors' Proposed DIP Lenders (TIX 33433 LLC)	DLA Piper LLP (US)	Emily Marshall	1201 West Peachtree Street NW			Atlanta	GA	30309
Counsel to Elderberry Nursing Home Landlords	Elderberry	Attn C. Lynch Christian, III	1000 Church Street, Third Floor			Lynchburg	VA	24504
Counsel to the Prepetition Omega Secured Parties, Omega Landlords, and Proposed DIP Lenders (OHI DIP Lender, LLC & OHI Mezz Lender, LLC)	Ferguson Braswell Fraser Kubasta PC	Attn Leighton Aiken	2500 Dallas Parkway, Suite 600			Plano	TX	75093
State Attorney General	Florida Attorney General	Attn Bankruptcy Department	PL-01 The Capitol			Tallahassee	FL	32399-1050
State Attorney General	Georgia Attorney General	Attorney General Chris Carr	40 Capitol Square, SW			Atlanta	GA	30334
Georgia Department of Revenue	Georgia Department of Revenue	Attn Bankruptcy Dept	State Revenue Commissioner	1800 Century Blvd NE, Suite 15300		Atlanta	GA	30345
Counsel to Welltower NNN Group, LLC	Gibson, Dunn & Crutcher LLP	Jeffrey C. Krause, Michael G. Farag	333 South Grand Avenue			Los Angeles	CA	90071
Counsel to the Prepetition Omega Secured Parties, Omega Landlords, and Proposed DIP Lenders (OHI DIP Lender, LLC & OHI Mezz Lender, LLC)	Goodwin Proctor LLP	Attn Robert J Lemons, Liza L. Burton	The New York Times Building	620 Eighth Avenue		New York	NY	10018
Counsel to Harts Harbor Health Landlords	Harts Harbor	Baker Donelson Bearman Caldwell & Berkowitz, PC	Attn Sandra Adams	200 East Broward Blvd, Suite 2000		Fort Lauderdale	FL	33301
Creditors Committee Member	Healthcare Negligence Settlement Recovery Corp.	John M. Herskowitz	c/o John A. Anthony	100 S. Ashley Drive, Suite 1600		Tampa	FL	33602
Creditors Committee Member / Top 30 Creditor	Healthcare Services Group	Patrick J Orr, Pete Nenstiel	3220 Tilman Drive, Suite No 300			Bensalem	PA	18201

SERVICE BY FIRST CLASS MAIL

Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip
Internal Revenue Service	Internal Revenue Service	Centralized Insolvency Operation	2970 Market St			Philadelphia	PA	19104
Internal Revenue Service	Internal Revenue Service	Centralized Insolvency Operation	PO Box 7346			Philadelphia	PA	19101-7346
Counsel to CAREmasters Homehealth LLC and CAREmasters Healthcare Services LLC	Jones & Walden LLC	Thomas T. McClendon	699 Piedmont Avenue, NE			Atlanta	GA	30308
Claims and Noticing Agent	KCC dba Verita	Sydney Reitzel	222 N Pacific Coast Highway, Ste 300			El Segundo	CA	90245
Counsel to LEAF Capital Funding, LLC	Kilpatrick Townsend & Stockton LLP	Paul M. Rosenblatt	1100 Peachtree St NE, Suite 2800			Atlanta	GA	30309
Counsel for Claimants and Interested Parties	Lamberth, Cifelli, Ellis & Nason, PA	G. Frank Nason, IV	6000 Lake Forrest Drive, NW Suite 435			Atlanta	GA	30328
Debtors	LaVie Care Centers LLC	M Benjamin Jones	c/o Ankura Consulting Group, LLC	485 Lexington Avenue, 10th Floor		New York	NY	10017
Counsel for the Debtors and Debtors-in-Possession	McDermott Will & Emery, LLP	Daniel M Simon	1180 Peachtree Street NE, Suite 3350			Atlanta	GA	30309
Counsel for the Debtors and Debtors-in-Possession	McDermott Will & Emery, LLP	Emily C Keil and Landon Foody	444 West Lake Street, Suite 4000			Chicago	IL	60606
Counsel for the Debtors and Debtors-in-Possession	McDermott Will & Emery, LLP	Jake Jumbeck, Catherine Lee	444 West Lake Street, Suite 4000			Chicago	IL	60606
State Attorney General	Mississippi Attorney General	Attn Bankruptcy Department	Walter Sillers Building	550 High St Ste 1200		Jackson	MS	39201
State Attorney General	North Carolina Attorney General	Attn Bankruptcy Department	9001 Mail Service Center			Raleigh	NC	27699-9001
Office of the United States Trustee for the Northern District of Georgia	Office of the United States Trustee	Jonathan S. Adams, R. Jeneane Treace	362 Richard B Russell Bldg	75 Ted Turner Drive, SW		Atlanta	GA	30303
Creditors Committee Member / Top 30 Creditor	Omnicare Inc	Foley & Lardner, LLP	Geoff Goodman	321 North Clark Street, Suite 300		Chicago	IL	60654
Creditors Committee Member / Top 30 Creditor	Omnicare Inc	Greg Day	6285 W. Galveston Street, #3			Chandler	AZ	85226
Creditors Committee Member / Top 30 Creditor	Omnicare Inc	Karen Dailey	100 E River Center Blvd			Covington	KY	41011
Counsel to Carolina Rehabilitation & Surgical Associates, P.A.	Pamela P. Keenan		PO Box 19766			Raleigh	NC	27619-9766
Counsel to the Debtors' Prepetition ABL Lender (MidCap Funding IV Trust)	Parker, Hudson, Rainer & Dobbs LLP	Bryan E. Bates	303 Peachtree Street NE, Suite 3600			Atlanta	GA	30308
State Attorney General	Pennsylvania Attorney General	Attn Bankruptcy Department	16th Floor, Strawberry Square			Harrisburg	PA	17120
Counsel to CDB Services USA LLC d/b/a weCare Staffing Services	Pierson Ferdinand LLP	Susan V Warner	333 SE 2nd Avenue, Suite 2000			Miami	FL	33131
Creditors Committee Member / Counsel to CDB Services USA LLC d/b/a weCare Staffing Services	Pierson Ferdinand LLP	Thomas R Walker	260 Peachtree Street NW, Suite 2200			Atlanta	GA	30303
Counsel to Welltower NNN Group, LLC	Polsinelli, PC	David E Gordon, Caryn E Wang, Ashley D Champion	1201 West Peachtree, Street NW, Suite 1100			Atlanta	GA	30309

SERVICE BY FIRST CLASS MAIL

Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip
Counsel to the Debtors' Prepetition ABL Lender (MidCap Funding IV Trust)	Proskauer Rose LLP	Attn Charles A Dale	One International Place			Boston	MA	02110
Counsel to the Debtors' Prepetition ABL Lender (MidCap Funding IV Trust)	Proskauer Rose LLP	Dylan Marker	Eleven Times Square			New York	NY	10036-8299
Counsel to United Steelworkers	Quinn, Connor, Weaver, Davies & Rouco, LLP	Glen M. Connor, Richard P. Rouco	Two North Twentieth Street Suite 930			Birmingham	AL	35203
Counsel to United Steelworkers and AFSCME	Quinn, Connor, Weaver, Davies & Rouco, LLP	Nicolas M. Stanojevich	4100 Perimeter Park South			Atlanta	GA	30341
Counsel to the Prepetition Omega Secured Parties, Omega Landlords, and Proposed DIP Lenders (OHI DIP Lender, LLC & OHI Mezz Lender, LLC)	Scroggins & Williamson, P.C.	Attn Matthew W Levin	4401 Northside Parkway, Suite 450			Atlanta	GA	30327
Creditors Committee Member / Top 30 Creditor	Shiftmed, LLC	Continental PLLC	c/o Jesus M. Suarez	255 Alhambra Circle, Suite 640		Coral Gables	FL	33134
Creditors Committee Member / Top 30 Creditor	Shiftmed, LLC	Susan M. Overton, General Counsel	7925 Jones Branch Drive, Suite 1100			McClellan	VA	22102
Patient Care Ombudsman for Virginia Facilities	State Long-Term Care Ombudsman	Joani Latimer	8004 Franklin Farms Drive			Richmond	VA	23229
Patient Care Ombudsman for Mississippi Facilities	State Long-Term Care Ombudsman	Lisa M. Smith	200 S. Lamar Street			Jackson	MS	39201
Patient Care Ombudsman for Pennsylvania Facilities	State Long-Term Care Ombudsman	Margaret Barajas	555 Walnut Street, 5th Floor			Harrisburg	PA	17101
Patient Care Ombudsman for Florida Facilities	State Long-Term Care Ombudsman	Terri Cantrell	4040 Esplande Way			Tallahassee	FL	32399
Patient Care Ombudsman for North Carolina Facilities	State Long-Term Care Ombudsman	Victor Orija	2101 Mail Service Center			Raleigh	NC	27699
Creditors Committee Member / Counsel to Healthcare Services Group, Inc.	Stevens & Lee	Robert Lapowsky, Elizabeth Rogers	620 Freedom Business Center, Suite 200			King of Prussia	PA	19406
Creditors Committee Member	The Estate of Nancy Walsh	Dawn Lograsso, as Personal Representative	c/o Blair Mendes	4401 W. Kennedy Boulevard, Suite 250		Tampa	FL	33609
Creditors Committee Member	Theodore Horrobin	Gordon & Partners	c/o Scott Fischer	4114 Northlake Boulevard		Palm Beach Gardens	FL	33410
Counsel to the Official Committee of Unsecured Creditors	Troutman Pepper Hamilton Sanders LLP	Francis J Lawall	3000 Two Logan Square	Eighteenth and Arch Streets		Philadelphia	PA	19103-2799
Counsel to the Official Committee of Unsecured Creditors	Troutman Pepper Hamilton Sanders LLP	Joanna J Cline, Heather P Smillie	1313 N. Market Street	Hercules Plaza, Suite 5100	PO Box 1709	Wilmington	DE	19899-1709
Counsel to the Official Committee of Unsecured Creditors	Troutman Pepper Hamilton Sanders LLP	Matthew R Brooks, Deborah Kovsky-Apap	875 Third Avenue			New York	NY	10022
Counsel to the Official Committee of Unsecured Creditors	Troutman Pepper Hamilton Sanders LLP	Pierce E. Rigney	600 Peachtree Street, NE, Suite 3000			Atlanta	GA	30308
Creditors Committee Member / Top 30 Creditor	Twin Med LLC	David Klamer	11333 Greenstone Avenue			Santa Fe Springs	CA	90670
Creditors Committee Member / Top 30 Creditor	Twin Med LLC		PO Box 847340			Los Angeles	CA	90084-7340
Securities & Exchange Commission	U.S. Securities & Exchange Commission	Office of Reorganization	950 East Paces Ferry Road NE, Suite 900			Atlanta	GA	30326-1382

SERVICE BY FIRST CLASS MAIL

Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip
United States Attorney for the Northern District of Georgia	United States Attorney Northern District of Georgia		600 Richard B Russell Bldg	75 Ted Turner Drive, SW		Atlanta	GA	30303-3309
Counsel to the Internal Revenue Service	United States Attorney's Office	Vivieon Kelly Jones, Assistant US Attorney	75 Ted Turner Drive SW, Suite 600			Atlanta	GA	30303
Counsel to the Debtors' Prepetition ABL Lender (MidCap Funding IV Trust)	Vedder Price PC	Attn Kathryn L Stevens	222 North LaSalle Street, Suite 2600			Chicago	IL	60601
State Attorney General	Virginia Attorney General	Attn Bankruptcy Department	202 North Ninth St			Richmond	VA	23219
Counsel to Superior Medical Staffing and Gale Healthcare Solutions, LLC	Walters Levine & DeGrave	Heather A. DeGrave	601 Bayshore Boulevard, Suite 720			Tampa	FL	33606
	Parkview KY Opco, LLC	c/o Plainview	1449 37th Street, Suite 605			Brooklyn	NY	11218
	SRZ OP Ashton LLC	Attention: Samuel Goldner	22 Herrick Drive			Lawrence	NY	11559
	BRIDGEWALK ON HARDEN HEALTH AND REHABILITATION, LLC	505 Ariana Avenue				Auburndale	FL	33823
	Winter Haven FL Opco, LLC	c/o Allen V. Koss, Esq.	Koss & Schonfeld, LLP	90 John Street, Suite 503		New York	NY	10038
	Lakeview SNF Operations LLC	Attn: Abe Berkovits	1463 66th Street			Brooklyn	NY	11219
	Vero Beach Operations, LLC	Attn: Abe Berkovits	1463 66th Street			Brooklyn	NY	11219
	Palm Springs SNF Operations LLC	Attn: Abe Berkovits	1463 66th Street			Brooklyn	NY	11219
	NEW PORT RICHEY OPCO, LLC	c/o Topaz Fiscal Services		6085 Strickland Avenue		Brooklyn	NY	11234
	Franco SNF Operations LLC	Attn: Abe Berkovits	1463 66th Street			Brooklyn	NY	11219
	BRANDON HEALTH OPCO, LLC	c/o Topaz Fiscal Services		6085 Strickland Avenue		Brooklyn	NY	11234
	Lake Parker SNF Operations LLC	Attn: Abe Berkovits	1463 66th Street			Brooklyn	NY	11219
	Melbourne Opco LLC	c/o Topaz Fiscal Services		6085 Strickland Avenue		Brooklyn	NY	11234
	Pensacola Opco LLC	c/o Topaz Fiscal Services		6085 Strickland Avenue		Brooklyn	NY	11234
	Bayonet Opco, LLC	c/o Topaz Fiscal Services		6085 Strickland Avenue		Brooklyn	NY	11234
	Kissimmee Opco LLC	c/o Topaz Fiscal Services		6085 Strickland Avenue		Brooklyn	NY	11234
	Sarasota Opco, LLC	c/o Topaz Fiscal Services		6085 Strickland Avenue		Brooklyn	NY	11234
	West Altamonte Opco, LLC	c/o Topaz Fiscal Services		6085 Strickland Avenue		Brooklyn	NY	11234
	Port Charlotte Opco, LLC	c/o Topaz Fiscal Services		6085 Strickland Avenue		Brooklyn	NY	11234
	PAVA PA OPCO LLC	PAVA PA OPCO LLC	228 Siemon Drive			Somerset	PA	15501
	Somerset Senior Living Operating Company LLC	c/o PAVA PA OPCO LLC	228 Siemon Drive			Somerset	PA	15501
	Parks Operating LLC	974 Rt. 45, Suite 1200				Pomono	NY	10970
	Lecanto FL Opco LLC	3512 Quentin Road				Brooklyn	NY	11234
	Melbourne FL Opco LLC	3512 Quentin Road				Brooklyn	NY	11234
	WEST DONEGAN AVE ALF OPCO LLC	338 Whitesville Road				Jackson	NJ	08527
	SAN JOSE BLVD OPCO LLC	338 Whitesville Road				Jackson	NJ	08527
	COUNTRYSIDE BLVD OPCO LLC	338 Whitesville Road				Jackson	NJ	08527
	Deltona Operating LLC	338 Whitesville Road				Jackson	NJ	08527
	SOUTH TUTTLE AVE OPCO LLC	338 Whitesville Road				Jackson	NJ	08527
	WEST FLETCHER AVE OPCO LLC	338 Whitesville Road				Jackson	NJ	08527
	13th Street OPCO LLC	338 Whitesville Road				Jackson	NJ	08527

SERVICE BY FIRST CLASS MAIL

Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip
	MIAMI ROAD OPCO LLC	338 Whitesville Road				Jackson	NJ	08527
	Albee Farm Road Opco LLC	974 Rt. 45. Suite 1200				Pomona	NY	10970
	WEST DONEGAN AVE SNF OPCO LLC	338 Whitesville Road				Jackson	NJ	08527
	Wedgewood Operating LLC	974 Rt. 45. Suite 1200				Pomona	NY	10970
	Bryan Dairy Road Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	Island Operating LLC	29 Little Nassau Street, Suite 102				Brooklyn	NY	11025
	NW 10TH PLACE OPCO LLC	338 Whitesville Road				Jackson	NJ	08527
	Reed Canal Road Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	Vista Manor Operating LLC	338 Whitesville Road				Jackson	NJ	08527
	Vista Manor Operating LLC	Attn: Robert Schoenfeld	3512 Quentin Road			Brooklyn	NY	11234
	West Colonial Drive Opco LLC	3512 Quentin Road				Brooklyn	NY	11234
	13th Road OPCO LLC	9311 South Orange Blossom Trail				Orlando	FL	32837
	Shore Drive OPCO LLC	338 Whitesville Road				Jackson	NJ	08527
	Pondella Road OPCO LLC	338 Whitesville Road				Jackson	NJ	08527
	Southpoint Drive East OPCO LLC	338 Whitesville Road				Jackson	NJ	08527
	Dr MLK Street OPCO LLC	338 Whitesville Road				Jackson	NJ	08527
	Park Boulevard OPCO LLC	338 Whitesville Road				Jackson	NJ	08527
	Oak Street OpCo LLC	338 Whitesville Road				Jackson	NJ	08527
	Marshall Drive OPCO LLC	338 Whitesville Road				Jackson	NJ	08527
	Hillcrest Opco LLC	974 Rt. 45. Suite 1200				Pomona	NY	10970
	Santa Barbara Blvd Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	Hillview Drive Opco LLC	974 Rt. 45. Suite 1200				Pomona	NY	10970
	Drury Lane Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	Evans Avenue Opco LLC	2901 Stirling Road, Suite 200				Fort Lauderdale	FL	33312
	North Brentwood Circle Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	Ginger Drive Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	Palm Coast Pkwy Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	NE 2nd Street Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	Rio Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	Habana Way Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	Wallis Road Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	Phillips Street Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	1059 Virginia St Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	6305 Cortez Rd W Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	1465 Oakfield Dr Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	1445 Howell Ave Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	626 N Tyndall Pkwy Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	710 N Sun Dr Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	500 Hospital Dr Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	5405 Babcock St NE Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	541 Old Canoe Creek Rd Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	3920 Rosewood Way Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	1061 Virginia St Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	12170 Cortez Blvd Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	743 S Beneva Rd Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	743 S Beneva Rd Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	702 S Kings Ave Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	2939 S Haverhill Rd Opco LLC	338 Whitesville Road				Jackson	NJ	08527
	1215 Kingsley Ave Opco LLC	338 Whitesville Road				Jackson	NJ	08527

SERVICE BY FIRST CLASS MAIL

Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip
	2575 Airline Drive OpCo LLC d/b/a Heritage Manor Health & Rehab	338 Whitesville Road				Jackson	NJ	08527
	2000 FRANK SNF, LLC d/b/a Heritage Manor of Ferriday	338 Whitesville Road				Jackson	NJ	08527
	2000 FRANK SNF, LLC d/b/a Fair City Health and Rehab	338 Whitesville Road				Jackson	NJ	08527
	4405 Airline Drive OpCo LLC d/b/a Adira Health & Rehab	338 Whitesville Road				Jackson	NJ	08527
	Baya Pointe SNF Operations LLC	1000 Gates Avenue				Brooklyn	NY	11221
	Floridean SNF Operations LLC	1000 Gates Avenue				Brooklyn	NY	11221
	Alexandria Operator, LLC	c/o Tryko Partners	Attn: Joseph Frank	1608 Rt. 88		Brick	NJ	08724
	Southampton Operator, LLC	c/o Tryko Partners	Attn: Joseph Frank	1608 Rt. 88		Brick	NJ	08724
	Fork Union SNF Operations LLC	c/o Tryko Partners	Attn: Joseph Frank	1608 Rt. 88		Brick	NJ	08724
	Chelsea Operator, LLC	c/o Tryko Partners	Attn: Joseph Frank	1608 Rt. 88		Brick	NJ	08724
	Lawrenceville SNF Operations LLC	c/o Tryko Partners	Attn: Joseph Frank	1608 Rt. 88		Brick	NJ	08724
	Westover Hills SNF Operations LLC	c/o Tryko Partners	Attn: Joseph Frank	1608 Rt. 88		Brick	NJ	08724
	Staunton SNF Operations LLC	c/o Tryko Partners	Attn: Joseph Frank	1608 Rt. 88		Brick	NJ	08724
	Williamsburg SNF Operations LLC	c/o Tryko Partners	Attn: Joseph Frank	1608 Rt. 88		Brick	NJ	08724
	Winchester SNF Operations LLC	c/o Tryko Partners	Attn: Joseph Frank	1608 Rt. 88		Brick	NJ	08724
	Belmont Bay Operator, LLC	c/o Tryko Partners	Attn: Joseph Frank	1608 Rt. 88		Brick	NJ	08724
	Osprey SNF Operations LLC	1000 Gates Avenue				Brooklyn	NY	11221