



IT IS ORDERED as set forth below:

Date: February 24, 2025

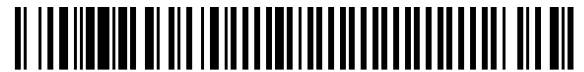
*Paul Baisier*

Paul Baisier  
U.S. Bankruptcy Court Judge

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

In re:	)	Chapter 11
LAVIE CARE CENTERS, LLC, <i>et al.</i> ,	)	Case No. 24-55507 (PMB)
Debtors. <sup>1</sup>	)	(Jointly Administered)
LAVIE CARE CENTERS, LLC and BRANDON FACILITY OPERATIONS, LLC,	)	Adv. Proc. No. 25-05007 (PMB)
Plaintiffs,	)	<b>Related to Adv. Docket Nos. 1, 2, 3, 4, 11</b>
v.	)	
CREA BRANDON-C LLC and BRANDON HEALTH OPCO, LLC,	)	
Defendants.	)	

<sup>1</sup> 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.veritaglobal.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.



**STIPULATION AND AGREED ORDER**

This Stipulation and Agreed Order (this “Order” or this “Stipulation”) is entered into by and among (a) LaVie Care Centers, LLC (“LaVie”) and Brandon Facility Operations, LLC (“Brandon” and, together with LaVie, the “Debtor-Plaintiffs”) and (b) CREA Brandon-C LLC and Brandon Health OpCo, LLC (together, the “Brandon Entities” and together with the Debtor-Plaintiffs, the “Parties”) regarding the above-captioned adversary proceeding (the “Adversary Proceeding”). In support hereof, the Parties hereby stipulate as follows:

**RECITALS**

**WHEREAS**, on January 6, 2025, the Debtor-Plaintiffs filed (i) the *Complaint* [Adv. Docket No. 1] (the “Complaint”), commencing the Adversary Proceeding; (ii) the *Debtor-Plaintiffs’ Motion for Entry of Order Extending Automatic Stay and/or Preliminarily Enjoining Claims and Causes of Action Against Non-Debtor Defendants* [Adv. Docket No. 2] (the “Motion”), seeking entry of an order extending the automatic stay and preliminarily enjoining the claims and causes of action asserted against Pourlessoins, LLC d/b/a Synergy Healthcare Services and Jared Elliott (together, the “Non-Debtor Defendants”) in that certain lawsuit pending in the Circuit Court for the Ninth Judicial Circuit in and for Orange County, Florida Business Court filed by the Brandon Entities captioned *CREA Brandon-C LLC and Brandon Health OpCo, LLC v. Pourlessoins, LLC, d/b/a Synergy Healthcare Services and Jared Elliott*, No. 24-CA-007910-O (the “2024 Brandon Action”); (iii) the *Brief in Support of Debtors’ Emergency Motion for Entry of Order Extending Automatic Stay and/or Preliminarily Enjoining Claims and Causes of Action Against Non-Debtor Defendants* [Adv. Docket No. 3]; and (iv) the *Declaration of Sydney Reitzel in Support of Debtor-Plaintiffs’ Emergency Motion for Entry of Order Extending Automatic Stay and/or Preliminarily Enjoining Claims and Causes of Action Against Non-Debtor Defendants* [Adv. Docket No. 4];

**WHEREAS**, the Non-Debtor Defendants and the Brandon Entities agreed via stipulation filed in the 2024 Brandon Action on January 22, 2025 (the “2024 Brandon Action Stipulation”) to hold the 2024 Brandon Action in abeyance until the Adversary Proceeding is resolved or an order is entered by the Bankruptcy Court (or the Parties reach an agreement) providing that the 2024 Brandon Action can proceed;

**WHEREAS**, on February 12, 2025, the Debtor-Plaintiffs and the Brandon Entities filed a *Stipulation and Agreed Order* (the “February 12 Stipulation”) [Adv. Docket No. 11] whereby the Debtor-Plaintiffs agreed to give the Brandon Entities an extension of the deadlines to respond to the Motion and the Complaint until February 24, 2025 (the “Response Deadline”); and

**WHEREAS**, on February 20, 2025, the Brandon Entities sought an extension of the Response Deadline through and including March 12, 2025, and the Debtor-Plaintiffs agreed to the Brandon Entities’ requested extension, reserving all rights in connection with the Adversary Proceeding and the 2024 Brandon Action;

**STIPULATION AND AGREED ORDER**

1. This Stipulation shall have no force or effect unless and until approved by the Bankruptcy Court.

2. As reflected in the 2024 Brandon Action Stipulation, the 2024 Brandon Action shall be held in abeyance until the Adversary Proceeding is resolved by Bankruptcy Court order or agreement between the Parties.

3. The Brandon Entities shall have until March 12, 2025, at 4:00 p.m. (prevailing Eastern Time) to respond to the relief requested in the Motion and the Complaint.

4. Nothing herein shall prejudice, waive, or release the rights, claims, counterclaims, objections, or defenses of the Debtor-Plaintiffs or the Brandon Entities with respect to the Adversary Proceeding or the 2024 Brandon Action, and all of the foregoing are expressly reserved.

5. Each of the Parties shall bear its own attorneys' fees and costs of suit incurred in connection with the drafting and negotiation of this Order.

6. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation and/or interpretation of this Order.

END OF ORDER

**STIPULATED AND AGREED TO:**

/s/ Daniel M. Simon

Daniel M. Simon (Georgia Bar No. 690075)

**MCDERMOTT WILL & EMERY LLP**

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/s/ Elizabeth Green

Elizabeth Green (admitted *pro hac vice*)

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*Counsel for the Brandon Entities*

- and -

Emily C. Keil (admitted *pro hac vice*)

Catherine Lee (admitted *pro hac vice*)

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*Counsel for the Debtors and Debtors-in-Possession*

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Brandon Health OpCo, LLC  
701 Victoria Street  
Brandon, FL 33510

LaVie Care Centers, LLC,  
Plaintiff  
CREA Brandon-C LLC,  
Defendant

Adv. Proc. No. 25-05007-pmb

## CERTIFICATE OF NOTICE

District/off: 113E-9

User: bncadmin

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Date Rcvd: Feb 24, 2025

Form ID: pdf492

Total Noticed: 2

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Feb 26, 2025:

Recip ID	Recipient Name and Address
+	Emily C. Keil, McDermott Will & Emery LLP, 444 West Lake Street, Suite 4000, Chicago, IL 60606-0029

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
ust	+ Email/Text: ustpregion21.at.ecf@usdoj.gov	Feb 24 2025 20:40:00	Office of the United States Trustee, 362 Richard Russell Building, 75 Ted Turner Drive, SW, Atlanta, GA 30303-3315

TOTAL: 1

## BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, \*duplicate of an address listed above, \*P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
*+		Emily C. Keil, McDermott Will & Emery LLP, 444 West Lake Street, Suite 4000, Chicago, IL 60606-0029

TOTAL: 0 Undeliverable, 1 Duplicate, 0 Out of date forwarding address

## NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Feb 26, 2025

Signature: /s/Gustava Winters

## CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on February 24, 2025 at the address(es) listed below:

Name	Email Address
Daniel M. Simon	on behalf of Plaintiff Brandon Facility Operations LLC dmsimon@mwe.com, dnorthrop@mwe.com;ekeil@mwe.com

Daniel M. Simon

District/off: 113E-9

User: bncadmin

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on behalf of Plaintiff LaVie Care Centers LLC dmsimon@mwe.com, dnorthrop@mwe.com;ekeil@mwe.com

Pierce Rigney

on behalf of Interested Party Official Committee of Unsecured Creditors pierce.rigney@troutman.com

TOTAL: 3