



### **STIPULATION AND AGREED ORDER**

This Stipulation and Agreed Order (this “Order” or this “Stipulation”) is entered into by and among (a) Vero Beach Operations, LLC (“Plaintiff”) and (b) LaVie Care Centers, LLC (“LaVie”) and Vero Beach Facility Operations, LLC (“Operations”, together with LaVie, the “Defendants” and together with the Plaintiff, the “Parties”) regarding the above-captioned adversary proceeding (the “Adversary Proceeding”). In support hereof, the Parties hereby stipulate as follows:

### **RECITALS**

**WHEREAS**, on April 17, 2025, the Plaintiff filed the *Complaint* [Adv. Docket No. 1] (the “Complaint”), commencing the Adversary Proceeding;

**WHEREAS**, Plaintiff effectuated proper service of the Complaint and *Summons in an Adversary Proceeding* [Adv. Docket No. 2] upon the Defendants as indicated in the *Certificate of Service* [Adv. Docket No. 3];

**WHEREAS**, the current deadline for Defendants to respond to the Complaint is May 19, 2025 (the “Response Deadline”); and

**WHEREAS**, on April 29, 2025, the Defendants sought an extension of the Response Deadline through and including July 3, 2025, and the Plaintiff agreed to the Defendants’ requested extension, reserving all rights in connection with the Adversary Proceeding;

### **STIPULATION AND AGREED ORDER**

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

2. The Defendants shall have until July 3, 2025, at 4:00 p.m. (prevailing Eastern Time) to respond to the Complaint.

3. Nothing herein shall prevent the Defendants from seeking any additional extensions to respond to the Complaint.

4. Nothing herein shall prejudice, waive, or release the rights, claims, counterclaims, objections, or defenses of the Defendants with respect to the Adversary Proceeding, 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

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