

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

In re:

LAVIE CARE CENTERS, LLC, *et al.*¹

Debtors.

)
) Chapter 11
)
) Case No. 24-55507 (PMB)
)
) (Jointly Administered)
)
) Related to Docket Nos. 481, 571, 593, 603, 630,
) 678, 679, 730, 731, 735, 736, 885
)

**NOTICE OF FIFTH AMENDED PLAN SUPPLEMENT WITH RESPECT TO THE
DEBTORS' MODIFIED SECOND AMENDED COMBINED DISCLOSURE
STATEMENT AND JOINT CHAPTER 11 PLAN OF REORGANIZATION**

PLEASE TAKE NOTICE that, on October 1, 2024, LaVie Care Centers, LLC and certain of its affiliates and subsidiaries (collectively, the “Debtors”) filed the *Debtors’ Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* [Docket No. 481] in the United States Bankruptcy Court for the Northern District of Georgia (the “Court”).

PLEASE TAKE FURTHER NOTICE that, on October 21, 2024, the Debtors filed the *Notice of Filing of GUC Trust Agreement with Respect to the Debtors’ Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* [Docket No. 571] (the “GUC Trust Agreement”).

PLEASE TAKE FURTHER NOTICE that, on October 28, 2024, the Debtors filed the *Notice of Filing of Plan Supplement with Respect to the Debtors’ Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* [Docket No. 593] (the “Original Plan Supplement”), which, among other things, set forth Timothy Lehner as the sole officer of the Debtors.

PLEASE TAKE FURTHER NOTICE that, on November 5, 2024, the Debtors filed the *First Amended Plan Supplement with Respect to the Debtors’ Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* [Docket No. 630] (the “First Amended Plan Supplement”).

PLEASE TAKE FURTHER NOTICE that, on November 13, 2024, the Debtors filed (i) the *Second Amended Plan Supplement with Respect to the Debtors’ Second Amended Combined*

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.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.



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Disclosure Statement and Joint Chapter 11 Plan of Reorganization [Docket No. 678] (the “Second Amended Plan Supplement”) and (ii) the *Debtors’ Modified Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* [Docket No. 679] (as amended, modified, or supplemented, the “Plan”).

PLEASE TAKE FURTHER NOTICE that, on November 14, 2024, the Court held a hearing on confirmation of the Debtors’ proposed plan of reorganization (the “Confirmation Hearing”) and concluded that the Plan satisfied the confirmation requirements set forth in section 1129(a) of the Bankruptcy Code.

PLEASE TAKE FURTHER NOTICE that, on December 4, 2024, the Debtors filed (i) the *Debtors’ Modified Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* [Docket No. 730] and (ii) the *Third Amended Plan Supplement with Respect to the Debtors’ Modified Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* [Docket No. 731] (the “Third Amended Plan Supplement”).

PLEASE TAKE FURTHER NOTICE that, on December 5, 2024, the Court entered the *Findings of Fact, Conclusions of Law, and Order Approving on a Final Basis and Confirming Debtors’ Modified Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* [Docket No. 735] (the “Confirmation Order”) and issued its *Memorandum Decision on Opt Out Third-Party Releases Included in Debtors’ Joint Second Amended Plan of Reorganization* [Docket No. 736] (the “Release Opinion”). The Confirmation Order provides that, in the event that Mr. Lehner resigned prior to the Effective Date, the Debtors shall file a notice on the docket designating his replacement.

PLEASE TAKE FURTHER NOTICE that, on March 18, 2025, the Debtors filed the *Fourth Amended Plan Supplement with Respect to the Debtors’ Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* [Docket No. 885] (the “Fourth Amended Plan Supplement”).

PLEASE TAKE FURTHER NOTICE that, because Mr. Lehner resigned prior to the Effective Date, the Debtors, pursuant to the Confirmation Order, hereby file the *Fifth Amended Plan Supplement with Respect to the Debtors’ Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* (the “Fifth Amended Plan Supplement,” and collectively with the Original Plan Supplement, the First Amended Plan Supplement, the Second Amended Plan Supplement, the Third Amended Plan Supplement, and the Fourth Amended Plan Supplement, the “Plan Supplement”), disclosing Mr. Lehner’s replacement as sole officer of the Reorganized Debtors.

<u>Exhibit</u>	<u>Description</u>
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Exhibit C	Revised Identity of Officers and Directors
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PLEASE TAKE FURTHER NOTICE that the Plan, the Original Plan Supplement, the First Amended Plan Supplement, the Second Amended Plan Supplement, the Third Amended Plan Supplement, the Fourth Amended Plan Supplement, the Fifth Amended Plan Supplement, the Confirmation Order, and all other documents and materials filed in the above-captioned chapter 11 cases may be examined by any party-in-interest at the Debtors’ case website

(<https://www.veritaglobal.net/LaVie>). Such documents may also be obtained by written request to Verita Global (the “Voting Agent”) by clicking the “Submit an Inquiry” option at <https://veritaglobal.net/lavie/inquiry> or by telephoning the Voting Agent at (877) 709-4750 (toll-free, U.S. or Canada) or (424) 236-7230 (International).

Dated: May 14, 2025
Atlanta, Georgia

MCDERMOTT WILL & EMERY LLP

/s/ Daniel M. Simon

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EXHIBIT C

Identity of Officers and Directors

Timothy Lehner has resigned from his position as manager of the Debtors and the current managers of the Debtors are as follows:

- LaVie Care Centers, LLC and LV Operations II, LLC—Tiffany Hoback, Manager
- OpCo Facility Debtors (as defined in the Plan and except for 11565 Harts Road Operations, LLC) and Consulate Management Company III, LLC—Ashley Winkle, Manager
- 11565 Harts Road Operations, LLC—Brad Lee, Manager

Pursuant to Article VI.B.9 of the Plan, on the Effective Date, any term of existing directors and officers of the Debtors, including the Chief Restructuring Officer and the Independent Manager (each as defined in the Plan), will expire and new officers or directors, as applicable, will be appointed by the Reorganized Debtors.

On the Effective Date, it is expected that Tiffany Hoback, as Manager, and the respective licensed NHA for each facility, as Manager, will be appointed as the sole managers of the Reorganized Debtors, subject to the ability of the Reorganized Debtors to make any future determination with respect to such individuals pursuant to the approval of the Reorganized Debtors after the Effective Date. Synergy is expected to provide back-office management services to the Reorganized Debtors on and after the Effective Date.