



IT IS ORDERED as set forth below:

Date: May 19, 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. ¹)	(Jointly Administered)
<hr/>		
VERO BEACH OPERATIONS, LLC,)	Adv. Proc. No. 25-05069 (PMB)
)	
)	
Plaintiff,)	
)	
v.)	
)	
VERO BEACH FACILITY OPERATIONS, LLC,)	
and LAVIE CARE CENTERS, LLC,)	
)	
Defendants.)	

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.



245550725052200000000001

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

Daniel M. Simon (Georgia Bar No. 690075)

MCDERMOTT WILL & EMERY LLP

1180 Peachtree Street NE, Suite 3350

Atlanta, Georgia 30309

Telephone: (404) 260-8535

Facsimile: (404) 393-5260

Email: dsimon@mwe.com

- and -

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

MCDERMOTT WILL & EMERY LLP

444 West Lake Street, Suite 4000

Chicago, Illinois 60606

Telephone: (312) 372-2000

Facsimile: (312) 984-7700

Email: ekeil@mwe.com

Counsel for the Defendants

/s/ Elizabeth Green

Elizabeth Green (admitted *pro hac vice*)

BAKERHOSTETLER LLP

200 S. Orange Ave., Suite 2300

Orlando, Florida 32801

Telephone: (407) 649-4036

Email: egreen@bakerlaw.com

Counsel for the Plaintiff

Distribution List

LaVie Care Centers, LLC
c/o Ankura Consulting Group, LLC,
485 Lexington Avenue, 10th Floor,
New York, NY 10017
Attn: M. Benjamin Jones

Daniel M. Simon
McDermott Will & Emery LLP
1180 Peachtree Street NE, Suite 3350
Atlanta, GA 30309

Emily C. Keil
McDermott Will & Emery LLP
444 West Lake Street, Suite 4000
Chicago, IL 60606

Kurtzman Carson Consultants LLC
222 N. Pacific Coast Highway, 3rd Floor
El Segundo, CA 90245

Jonathan S. Adams
Office of the United States Trustee
362 Richard Russell Federal Building
75 Ted Turner Drive, SW
Atlanta, GA 30303

Elizabeth Green
BAKERHOSTETLER LLP
200 S. Orange Ave., Suite 2300
Orlando, Florida 32801

Francis J. Lawall
Troutman Pepper Hamilton Sanders LLP
3000 Two Logan Square Eighteenth and Arch Streets
Philadelphia, PA 19103-2799

Deborah Kovsky-Apap
Troutman Pepper Hamilton Sanders LLP
875 Third Avenue
New York, NY 10022

United States Bankruptcy Court
Northern District of Georgia

Vero Beach Operations, LLC,
Plaintiff
Vero Beach Facility Operations, LLC,
Defendant

Adv. Proc. No. 25-05069-pmb

CERTIFICATE OF NOTICE

District/off: 113E-9

User: bncadmin

Page 1 of 2

Date Rcvd: May 19, 2025

Form ID: pdf492

Total Noticed: 11

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.
^	Addresses marked '^' were sent via mandatory electronic bankruptcy noticing pursuant to Fed. R. Bank. P. 9036.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on May 21, 2025:

Recip ID	Recipient Name and Address
	+ Daniel M. Simon, McDermott Will & Emery LLP, 1180 Peachtree Street NE, Suite 3350, Atlanta, GA 30309-7516
	+ Deborah Kovsky-Apap, Troutman Pepper Hamilton Sanders, 875 Third Avenue, New York, NY 10022-6225
	+ Elizabeth Green, BAKERHOSTETLER LLP, 200 S. Orange Ave., Suite 2300, Orlando, Florida 32801-3432
	+ Emily C. Keil, McDermott Will & Emery LLP, 444 West Lake Street, Suite 4000, Chicago, IL 60606-0029
	Francis J. Lawall, 3000 Two Logan Square Eighteenth, and Arch Streets, Philadelphia, PA 19103-2799
	Francis J. Lawall, Troutman Pepper Hamilton Sanders, 3000 Two Logan Square Eighteenth, and Arch Streets, Philadelphia, PA 19103-2799
	+ Jonathan S. Adams, Office of the United States Tr, 362 Richard Russell Federal Bldg, 75 Ted Turner Drive, SW, Atlanta, GA 30303-3315
	+ Kurtzman Carson Consultants LLC, 222 N. Pacific Coast Highway, 3rd Floor, El Segundo, CA 90245-5648
dft	+ LaVie Care Centers, LLC, 1040 Crown Point Parkway, Suite 600, Atlanta, GA 30338-4741

TOTAL: 9

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: ustpreion21.at.ecf@usdoj.gov	May 19 2025 20:32:00	Office of the United States Trustee, 362 Richard Russell Building, 75 Ted Turner Drive, SW, Atlanta, GA 30303-3315
	^ MEBN	May 19 2025 20:31:55	LaVie Care Centers, LLC, c/o Ankura Consulting Group, LLC, Attn: M. Benjamin Jones, 485 Lexington Avenue, 10th Floor, New York, NY 10017-2619

TOTAL: 2

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.

NONE

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: May 21, 2025

Signature: /s/Gustava Winters

District/off: 113E-9

User: bncadmin

Page 2 of 2

Date Rcvd: May 19, 2025

Form ID: pdf492

Total Noticed: 11

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on May 19, 2025 at the address(es) listed below:

Name	Email Address
Catherine T. Lee	on behalf of Defendant LaVie Care Centers LLC clee@mwe.com
Daniel M. Simon	on behalf of Defendant LaVie Care Centers LLC dmsimon@mwe.com, dnorthrop@mwe.com;ekeil@mwe.com
Elizabeth A. Green	on behalf of Plaintiff Vero Beach Operations LLC egreen@bakerlaw.com, orlbankruptcy@bakerlaw.com
Elyssa S. Kates	on behalf of Plaintiff Vero Beach Operations LLC ekates@bakerlaw.com
Emily C. Keil	on behalf of Defendant LaVie Care Centers LLC ekeil@mwe.com
Jack Gabriel Haake	on behalf of Defendant LaVie Care Centers LLC jhaake@mwe.com
Nathan M. Bull	on behalf of Defendant LaVie Care Centers LLC nbull@mwe.com
R. Jacob Jumbeck	on behalf of Defendant LaVie Care Centers LLC jjumbeck@mwe.com
Ronald Barrett Gaither, Jr	on behalf of Plaintiff Vero Beach Operations LLC rgaither@bakerlaw.com, sfarrington@bakerlaw.com

TOTAL: 9