



**IT IS ORDERED as set forth below:**

**Date: May 22, 2025**

*Paul Baisier*

**Paul Baisier  
U.S. Bankruptcy Court Judge**

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

In re:

LAVIE CARE CENTERS, LLC, *et al.*,<sup>1</sup>

Debtors.

)  
) Chapter 11  
)

) Case No. 24-55507 (PMB)  
)

) (Jointly Administered)  
)

) Related to Docket No. 985  
)

**ORDER (I) APPROVING (A) OMNIBUS CLAIMS OBJECTION  
PROCEDURES AND (B) FILING OF SUBSTANTIVE CLAIMS  
OBJECTIONS, (II) WAIVING THE REQUIREMENT OF  
BANKRUPTCY RULE 3007(e)(6), AND (III) GRANTING RELATED RELIEF**

Upon the *Debtors' Motion for Entry of Order (I) Approving (A) Omnibus Claims Objection  
Procedures and (B) Filing of Substantive Claims Objections, (II) Waiving the Requirement of*

<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.



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*Bankruptcy Rule 3007(e)(6), and (III) Granting Related Relief* [Docket No. 985] (the “Motion”)<sup>2</sup> filed on May 7, 2025 by the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) for entry of an order (i) approving (a) the Objection Procedures attached hereto as **Exhibit 1**, (b) the Objection Notice attached hereto as **Exhibit 2**, and (c) the filing of substantive objections by the Debtors or any person or entity with the powers to reconcile Claims, including requests for payment of Administrative Claims pursuant to the Confirmed Plan, in an omnibus format pursuant to Bankruptcy Rule 3007(c), (ii) waiving the requirement of Bankruptcy Rule 3007(e)(6), and (iii) granting related relief, all as more fully set forth in the Motion; and the Court having jurisdiction over the Motion pursuant to 28 U.S.C. §§ 1334 and 157(b), the Motion being a core matter pursuant to 28 U.S.C. § 157(b)(2), the Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtors’ estates, their creditors, and other parties in interest; and the Court being able to enter a final order consistent with Article III of the United States Constitution; and the Debtors having filed a notice setting the Motion and any responses thereto for hearing on May 22, 2025 (the “Hearing”); and the Court having found that notice of the Motion and opportunity for hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and the Court having found that all requisite parties-in-interest had an opportunity to file a response to the Motion and attend the Hearing to support any asserted response to the Motion; and no response to the Motion was filed and no creditor or party in interest appeared to oppose the relief requested in the Motion; and the Court having reviewed and considered the Motion and all other matters of record in these

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<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

chapter 11 cases, including the lack of objection thereto; and it appearing that the relief requested in the Motion is in the best interests of the Debtors, their estates, and their creditors, and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation thereon; and good and sufficient cause appearing therefor, it is hereby ORDERED that:

1. The Motion is GRANTED as set forth herein.
2. Notwithstanding anything to the contrary in the Bankruptcy Code and Bankruptcy Rules, and pursuant to Bankruptcy Rule 3007(c), and Local Rule 3007-1, the Debtors (or any successors thereto) and the GUC Trustee may file Omnibus Objections that include objections to Claims on any basis provided for in Bankruptcy Rule 3007(d), Bankruptcy Local Rule 3007-1, and/or the Additional Grounds.
3. Notwithstanding anything to the contrary in the Bankruptcy Code and Bankruptcy Rules, and pursuant to Bankruptcy Rule 3007(c), and Local Rule 3007-1, the Debtors (or any successors thereto) and the GUC Trustee may object to more than 100 Claims in a single Omnibus Objection on any of the bases set forth in Bankruptcy Rule 3007(d) or the Additional Grounds.
4. The Debtors (or any successors thereto) and the GUC Trustee shall be authorized to file and prosecute any Omnibus Objections in accordance with the Objection Procedures attached hereto as **Exhibit 1**, which are hereby approved, and the other procedural safeguards set forth in Bankruptcy Rule 3007(e) (excluding the limitations set forth in Bankruptcy Rule 3007(e)(6)) and Bankruptcy Local Rule 3007-1.
5. The form of Objection Notice attached hereto as **Exhibit 2** is hereby approved.
6. For the avoidance of doubt, the relief accorded by any provision of this Order to the Debtors shall also be available to the GUC Trustee with respect to its reconciliation of General

Unsecured Claims in Class 6A (OpCo General Unsecured Claims), Class 6B (DivestCo General Unsecured Claims), and Class 6C (Joint & Several OpCo General Unsecured Claims) in accordance with the Plan and related GUC Trust Agreement.

7. For the avoidance of doubt, to the extent that an Omnibus Objection is filed pursuant to the Objection Procedures, such Omnibus Objection shall not waive or impair the right of the Debtors (or any successors thereto) or the GUC Trustee to file one or more additional objections to the same Claim on separate grounds.

8. Nothing in this Order shall affect the Debtors' (or any successors' thereto) authority to pay Claims to the extent authorized by a separate order of the Court.

9. Nothing in this Order shall obligate the Debtors (or any successors thereto) or the GUC Trustee to settle or pursue settlement of any particular Claim. Settlements of Claims may be negotiated and compromised by the Debtors (or any successors thereto) or the GUC Trustee, as applicable, in their or its sole discretion (subject to applicable law).

10. For the avoidance of doubt, the Debtors (or any successors thereto) or the GUC Trustee may include scheduled Claims in Omnibus Objections.

11. Notice of the Motion as provided therein is hereby deemed good and sufficient notice of such Motion, and the requirements of the Bankruptcy Rules and the Bankruptcy Local Rules are satisfied by such notice.

12. The terms and conditions of this Order are immediately effective and enforceable upon its entry.

13. The Debtors and the GUC Trustee are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order.

14. This Court shall retain jurisdiction with respect to any matters, claims, rights, or disputes arising from or relating to the implementation of this Order.

END OF DOCUMENT

Prepared and presented by:

/s/ Daniel M. Simon

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

**EXHIBIT 1**

**Objection Procedures**

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

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

**PROCEDURES FOR FILING OMNIBUS CLAIM OBJECTIONS**

1. Grounds for Omnibus Objections. In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), the Debtors and/or the GUC Trustee may file omnibus objections (each, an “Omnibus Objection”) to Claims on the grounds that such Claims, in part or in whole:

- (a) are inconsistent with the Debtors’ books and records;
- (a) fail to specify the asserted Claim amount (or only list the Claim amount as “unliquidated”);
- (b) seek recovery of amounts for which the Debtors are not liable;
- (c) are incorrectly or improperly classified, including, but not limited to, as (i) Claims entitled to improper priority treatment under the Bankruptcy Code or (ii) Claims with an asserted but unperfected or invalid security interest against the Debtors;
- (d) assert administrative priority under Bankruptcy Code section 503(b)(9) but fail to assert a Claim for goods delivered to the Debtors within 20 days of the Petition Date;
- (e) have been formally withdrawn by the claimant through the filing of a pleading or through the entry of a Court order indicating withdrawal of the Claim;

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<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.



- (f) are filed against non-Debtors, the incorrect Debtor, or are filed against multiple Debtors;
- (g) fail to specify a Debtor against whom the Claim is asserted;
- (h) are disallowed pursuant to Bankruptcy Code section 502;
- (i) fail to sufficiently specify the basis for the Claim or provide sufficient supporting documentation therefor;
- (j) are disallowed pursuant to, or asserted in an amount, priority, or on terms that are otherwise inconsistent with, the Plan; or
- (k) have been satisfied by payment in full or in part on account of such Claim from a party that is not a debtor, including one or more of the Debtors' insurers. For the avoidance of doubt, a partial satisfaction of a Claim shall result in a reduction by the applicable portion of such Claim that has been satisfied, not a disallowance of such Claim.

2. Form of Omnibus Objection. Each Omnibus Objection will be numbered consecutively, regardless of basis.

3. Claims Exhibits. An exhibit listing the Claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the Claims to which there is a common basis for the objection. Claims for which there is more than one basis for the objection will be referenced on each exhibit applicable thereto. Including an Omnibus Objection on one exhibit will not constitute a waiver of the Debtors' or the GUC Trustee's right to object to the Claim on an additional basis or bases. The exhibits will include, without limitation, the following information alphabetized by claimant:

- (a) the Claims that are the subject of the Omnibus Objection and, if applicable, the Proof of Claim number or Schedule number related thereto from the Claims Register;
- (b) the asserted amount of the Claim;
- (c) the grounds for the objection;

- (d) other information, as applicable, including: (i) the proposed classification of Claims the Debtors or the GUC Trustee seek(s) to reclassify; (ii) the reduced Claim amounts of Claims the Debtors or the GUC Trustee seek(s) to reduce; or (iii) the surviving Claims of claimants affected by the Omnibus Objection; and
- (e) each Omnibus Objection will be accompanied by a proposed form of order granting the Omnibus Objection.

4. Objection Notice. Each Omnibus Objection will be accompanied by an objection notice, substantially in the form annexed to the Order as Exhibit 2 (the “Objection Notice”), which will:

- (a) describe the basis of the objection;
- (b) inform creditors that their rights may be affected by the objection;
- (c) describe the procedures for filing a written response (each, a “Response”) to the objection, including all relevant dates and deadlines related thereto;
- (d) identify the hearing date, if applicable, and related information; and
- (e) describe how copies of Proofs of Claim, the Omnibus Objection, and other pleadings filed in the Chapter 11 Cases may be obtained.

5. Notice and Service. Each Omnibus Objection will be filed with the Court and served electronically using the Court’s electronic filing system. Each Omnibus Objection (along with a copy of the Objection Notice) will be mailed to each Claim holder (and, if available its attorney of record) that is subject to such objection.

6. Omnibus Claims Objection Hearings. Each Omnibus Objection may be set for hearing no less than 30 days after service of the Omnibus Objection (each, a “Hearing”). In the Debtors’ or the GUC Trustee’s sole discretion, as applicable, and after notice to the affected claimant, the Debtors, or the GUC Trustee, as applicable, may (without further order of the Court) adjourn the Hearing on the Omnibus Objection to a subsequent hearing date by filing a notice or statement on the record. For Claims subject to an Omnibus Objection and with respect to which

either (a) no Response is filed in accordance with the proposed response procedures or (b) a Response is filed in accordance with the proposed response procedures but such Response is resolved prior to the Hearing, the Debtors or the GUC Trustee, as applicable, may submit a certificate of no objection to the Court and request that the Court enter an order granting the Omnibus Objection with respect to such Claims. Contested Claims for which a Response is filed in accordance with the proposed response procedures but such Response is not resolved prior to the Hearing and an appearance is made at the Hearing may be heard at the Hearing or adjourned to a subsequent hearing date in the Debtors' or the GUC Trustee's sole discretion, as applicable, subject to the Court's availability. If a subsequent hearing is determined to be necessary, the Debtors or the GUC Trustee, as applicable, shall file with the Court and serve on the affected claimants a notice of the hearing (the date of which shall be determined in consultation with the affected claimant(s)) or announce such adjournment on the record. Notwithstanding the foregoing, nothing herein shall prejudice the Debtors' or the GUC Trustee's rights to seek entry of an order sustaining the Omnibus Objection as to any or all Claims contained therein, as applicable.

7. Contested Matter. Each Claim subject to an Omnibus Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such Claim. The Debtors or the GUC Trustee, as applicable, may, in their or its discretion and in accordance with other orders of this Court and the provisions of the Bankruptcy Code and Bankruptcy Rules, settle the priority, amount, and validity of such contested Claims without any further notice to or action, order, or approval of the Court.

**Responses to Omnibus Objections**

8. Parties Required to File a Response. Any party who disagrees with an objection is required to file a Response in accordance with the procedures set forth herein and to appear at the Hearing if such Response is not resolved prior to the Hearing. If a claimant whose Claim is subject to an Omnibus Objection does not file and serve a Response in compliance with the procedures below or fails to appear at the Hearing, the Court may grant the objection with respect to such Claim without further notice to the claimant.

9. Response Contents. Each Response must contain the following (at a minimum):

- (a) a caption stating the name of the Court, the names of the Debtors, the case number, and the Omnibus Objection to which the Response is directed, and, if applicable, the Proof of Claim number(s) related thereto from the Claims Register;
- (b) a concise statement setting forth the reasons why the Court should not grant the objection with respect to such Claim, including the factual and legal bases upon which the claimant will rely in opposing the Omnibus Objection;
- (c) a copy of any other documentation or other evidence of the Claim, to the extent not already included with the Claim, upon which the claimant will rely in opposing the objection; provided that the claimant need not disclose confidential, proprietary, or otherwise protected information in the Response; provided, further, that the claimant shall disclose to counsel for the Debtors or the GUC Trustee, as applicable, all information and provide copies of all documents that the claimant believes to be confidential, proprietary, or otherwise protected and upon which the claimant intends to rely in support of its Claim, subject to appropriate confidentiality constraints;
- (d) a declaration or other statement of a person with personal knowledge of the relevant facts that support the Response; and
- (e) the following contact information for the responding party:
  - (i) the name, address, telephone number, and email address of the responding claimant or the name, address, telephone number, and email address of the claimant's attorney or designated representative

to whom the attorneys for the Debtors or the GUC Trustee, as applicable, should serve a reply to the Response, if any; or

- (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the claimant's behalf.

10. Filing and Service of the Response. A Response will be deemed timely only if it is filed with the Court and served electronically using the Court's electronic filing system and actually received by 4:00 p.m. (prevailing Eastern Time) on the day that is thirty (30) calendar days from the date the Omnibus Objection is served (the "Response Deadline") unless as otherwise ordered by the Court, by the following parties (the "Notice Parties"):

- (a) the Office of the United States Trustee, 362 Richard Russell Federal Building, 75 Ted Turner Drive, SW, Atlanta, GA 30303, Attn: Jonathan S. Adams (jonathan.s.adams@usdoj.gov);
- (b) counsel to the Debtors, McDermott Will & Emery LLP, 1180 Peachtree Street NE, Suite 3350, Atlanta, GA 30309, Attn: Daniel M. Simon (dsimon@mwe.com) and 444 W. Lake Street, Suite 4000, Chicago, IL 60606, Attn: Emily C. Keil (ekeil@mwe.com);
- (c) the GUC Trustee, Ryniker Consultants LLC, 1178 Broadway, 3rd Floor #1505, New York, NY 10001, Attn: Brian Ryniker (brian@rkcllc); and
- (d) counsel to the GUC Trustee, Troutman Pepper Hamilton Sanders LLP, 3000 Two Logan Square, Eighteenth and Arch Street, Philadelphia, PA 19103-2799, Attn: Francis J. Lawall (francis.lawall@troutman.com) and 875 Third Avenue, New York, NY 10022, Attn: Deborah Kovsky-Apap (deborah.kovsky@troutman.com).

11. Discovery. If the Debtors or the GUC Trustee, as applicable, determine that discovery is necessary in advance of a hearing on an Omnibus Objection, the Debtors or the GUC Trustee, as applicable, will serve notice on the affected claimant and its counsel of record that the scheduled hearing will be treated as a status conference during which the parties will request that the Court issue a scheduling order to facilitate dismissal or resolution of the litigation. Such notice

may be incorporated into the initial agenda letter for the hearing or may be provided by separate notice.

12. Failure to Respond. A Response that is not filed and served in accordance with the procedures set forth herein may not be considered by the Court at the Hearing. Absent reaching an agreement with the Debtors or the GUC Trustee, as applicable, resolving the objection to a Claim (as described in the Objection Notice), failure to timely file and serve a Response as set forth herein or to appear at the Hearing may result in the Court granting the Omnibus Objection without further notice or hearing. Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

13. Reply to a Response. The Debtors or the GUC Trustee, as applicable, shall be permitted to file a reply to any Response no later than one business day before the hearing with respect to the relevant Omnibus Objection.

#### **Miscellaneous**

14. Additional Information. Copies of these procedures, the Motion, the Order, or any other pleadings (the “Pleadings”) filed in these chapter 11 cases are available at no cost at the Debtors’ restructuring website: <https://www.veritaglobal.net/lavie>. You may also obtain copies of any of the pleadings filed in these chapter 11 cases for a fee at the Court’s website at [www.ganb.uscourts.gov](http://www.ganb.uscourts.gov).

15. Reservation of Rights. NOTHING IN ANY OMNIBUS OBJECTION OR OBJECTION NOTICE IS INTENDED OR SHALL BE DEEMED TO CONSTITUTE (A) AN ADMISSION AS TO THE VALIDITY OF ANY PREPETITION CLAIM AGAINST A DEBTOR ENTITY; (B) A WAIVER OF ANY RIGHT OF ANY DEBTOR OR THE GUC TRUSTEE, AS APPLICABLE, TO DISPUTE ANY PREPETITION CLAIM ON ANY

GROUNDS, ASSERT COUNTERCLAIMS, RIGHTS OF OFFSET OR RECOUPMENT, DEFENSES, OBJECT TO CLAIMS (OR OTHER CLAIMS OR CAUSES OF ACTION OF A CLAIMANT) ON ANY GROUNDS NOT PREVIOUSLY RAISED IN AN OBJECTION, UNLESS THE COURT HAS ALLOWED A CLAIM OR ORDERED OTHERWISE, OR SEEK TO ESTIMATE ANY CLAIM AT A LATER DATE; (C) A PROMISE OR REQUIREMENT TO PAY ANY PREPETITION CLAIM; (D) AN IMPLICATION OR ADMISSION THAT ANY PARTICULAR CLAIM IS OF A TYPE SPECIFIED OR DEFINED IN THIS MOTION OR ANY ORDER GRANTING THE RELIEF REQUESTED BY THIS MOTION; (E) A REQUEST OR AUTHORIZATION TO ASSUME ANY PREPETITION AGREEMENT, CONTRACT, OR LEASE PURSUANT TO SECTION 365 OF THE BANKRUPTCY CODE; OR (F) A WAIVER OF ANY RIGHT OF ANY DEBTOR OR THE GUC TRUSTEE, AS APPLICABLE, UNDER THE BANKRUPTCY CODE OR ANY OTHER APPLICABLE LAW.

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**EXHIBIT 2**

**Objection Notice**



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

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

**NOTICE OF HEARING AND DEADLINE TO RESPOND TO  
THE [DEBTORS’/GUC TRUSTEE’S] [NUMBER] OMNIBUS CLAIMS OBJECTION**

**THIS IS AN OBJECTION TO YOUR CLAIM. SUBSTANTIVE RIGHTS MAY BE AFFECTED BY THIS OBJECTION AND BY ANY FURTHER OBJECTION THAT MAY BE FILED. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON EXHIBIT A ATTACHED HERETO TO LEARN THE GROUNDS FOR THE OBJECTION PERTAINING TO THEIR CLAIMS AND THE RELIEF BEING SOUGHT BY THE [DEBTORS/GUC TRUSTEE].**

**PLEASE BE AWARE THAT THE [DEBTORS/GUC TRUSTEE] ARE ASKING THE COURT TO DISALLOW THE CLAIM(S) THAT YOU FILED IN THESE CHAPTER 11 CASES. TO THE EXTENT YOU DISAGREE WITH THE RELIEF SOUGHT IN THE OBJECTION, YOU SHOULD IMMEDIATELY CONTACT THE [DEBTORS/GUC TRUSTEE] TO RESOLVE THE DISPUTE. IF YOU DO NOT REACH AN AGREEMENT, YOU MUST FILE A RESPONSE TO THIS OBJECTION AND SEND A COPY OF YOUR RESPONSE TO THE [DEBTORS/GUC TRUSTEE] AND THEIR COUNSEL BY [ ], 2025 AT 4:00 P.M. (PREVAILING EASTERN TIME). YOUR RESPONSE MUST STATE WHY THE OBJECTION IS NOT VALID. IF YOU DO NOT FILE A RESPONSE BY [ ], 2025 AT 4:00 P.M. (PREVAILING EASTERN TIME), YOUR CLAIM MAY BE DISALLOWED, EXPUNGED, OR ELIMINATED WITHOUT FURTHER NOTICE OR HEARING.**

**A HEARING (THE “HEARING”) ON THE OBJECTION AND ANY RESPONSES FILED THERETO WILL TAKE PLACE ON [ ], 2025 AT [ ]:[ ] [ ].M. (PREVAILING EASTERN TIME) BEFORE THE HONORABLE PAUL M. BAISIER AT THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF GEORGIA, 75**

<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.

TED TURNER DR. SW, COURTROOM 1202, ATLANTA, GEORGIA 30303, WHICH MAY BE ATTENDED IN PERSON OR VIRTUALLY VIA THE COURT'S VIRTUAL HEARING ROOM. YOU MAY JOIN THE VIRTUAL HEARING ROOM THROUGH THE "DIAL-IN AND VIRTUAL BANKRUPTCY HEARING INFORMATION" LINK AT THE TOP OF THE HOMEPAGE OF THE COURT'S WEBSITE, [WWW.GANB.USCOURTS.GOV](http://WWW.GANB.USCOURTS.GOV), OR THE VIRTUAL HEARING ROOM LINK ON JUDGE BAISIER'S WEBPAGE, WHICH CAN BE FOUND AT [HTTPS://WWW.GANB.USCOURTS.GOV/CONTENT/HONORABLE-PAUL-M-BAISIER](https://WWW.GANB.USCOURTS.GOV/CONTENT/HONORABLE-PAUL-M-BAISIER). PLEASE ALSO REVIEW THE "HEARING INFORMATION" TAB ON JUDGE BAISIER'S WEBPAGE FOR FURTHER INFORMATION ABOUT THE HEARINGS. YOU SHOULD BE PREPARED TO APPEAR AT THE HEARINGS VIA VIDEO, BUT YOU MAY LEAVE YOUR CAMERA IN THE OFF POSITION UNTIL THE COURT INSTRUCTS OTHERWISE. UNREPRESENTED PERSONS WHO DO NOT HAVE VIDEO CAPABILITY MAY USE THE TELEPHONE DIAL-IN INFORMATION ON JUDGE BAISIER'S WEBPAGE.

THE RELIEF SOUGHT HEREIN IS WITHOUT PREJUDICE TO THE [DEBTORS/GUC TRUSTEE] OR ANY PARTY IN INTEREST'S RIGHTS TO PURSUE FURTHER OBJECTIONS AGAINST THE CLAIMS LISTED ON EXHIBIT A TO THIS OBJECTION.

### **Important Information Regarding the Objection**

Grounds for the Objection. By the Objection, the [Debtors or the GUC Trustee] [are/is] seeking to [**disallow/expunge/reclassify/reduce/subordinate**] your Claim(s) listed in the schedule attached hereto on the grounds that your Claim(s) [is/are] [ ]. The Claim(s) subject to the Objection may also be found on the schedules attached to the Objection, a copy of which has been provided with this notice.

Objection Procedures. On [ ], the United States Bankruptcy Court for the Northern District of Georgia (the "Court") entered an order [Docket No. [ ]] approving procedures for filing and resolving objections to Claims asserted against the Debtors in these chapter 11 cases (the "Objection Procedures"). A copy of the Objection Procedures is included with this notice. **Please review the Objection Procedures to ensure your response to the Objection, if any, is timely and correctly filed and served.**

### **Resolving the Objection**

Parties Required to File a Response. If you disagree with the Objection filed with respect to your Claim, you must file a response (each, a "Response") with the Court in accordance with the procedures described below and appear at the Hearing if such Response is not resolved prior to the Hearing.

Response Contents. Each Response must contain the following (at a minimum):

- (a) a caption stating the name of the Court, the names of the Debtors, the case number, and the Omnibus Objection to which the Response is directed, and, if applicable, the Proof of Claim number(s) related thereto from the Claims Register;
- (b) a concise statement setting forth the reasons why the Court should not grant the objection with respect to such Claim, including the factual and legal bases upon which the claimant will rely in opposing the Omnibus Objection;
- (c) a copy of any other documentation or other evidence of the Claim, to the extent not already included with the Claim, upon which the claimant will rely in opposing the objection; provided that the claimant need not disclose confidential, proprietary, or otherwise protected information in the Response; provided, further, that the claimant shall disclose to counsel for the Debtors or the GUC Trustee, as applicable, all information and provide copies of all documents that the claimant believes to be confidential, proprietary, or otherwise protected and upon which the claimant intends to rely in support of its Claim, subject to appropriate confidentiality constraints;
- (d) a declaration or other statement of a person with personal knowledge of the relevant facts that support the Response; and
- (e) the following contact information for the responding party:
  - (i) the name, address, telephone number, and email address of the responding claimant or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the attorneys for the Debtors or the GUC Trustee, as applicable, should serve a reply to the Response, if any; or
  - (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the claimant's behalf.

**Notice and Service.** Your Response must be filed with the Court and served electronically using the Court's electronic filing system and **actually received by 4:00 p.m. (prevailing Eastern Time)** on [ ], 2025 (the "Response Deadline") by the following parties (the "Notice Parties"):

- (a) the Office of the United States Trustee, 362 Richard Russell Federal Building, 75 Ted Turner Drive, SW, Atlanta, GA 30303, Attn: Jonathan S. Adams (jonathan.s.adams@usdoj.gov);
- (b) counsel to the Debtors, McDermott Will & Emery LLP, 1180 Peachtree Street NE, Suite 3350, Atlanta, GA 30309, Attn: Daniel M. Simon (dsimon@mwe.com) and 444 W. Lake Street, Suite 4000, Chicago, IL 60606, Attn: Emily C. Keil (ekeil@mwe.com);

- (c) the GUC Trustee, Ryniker Consultants LLC, 1178 Broadway, 3rd Floor #1505, New York, NY 10001, Attn: Brian Ryniker (brian@rkc.llc); and
- (d) counsel to the GUC Trustee, Troutman Pepper Hamilton Sanders LLP, 3000 Two Logan Square, Eighteenth and Arch Street, Philadelphia, PA 19103-2799, Attn: Francis J. Lawall (francis.lawall@troutman.com) and 875 Third Avenue, New York, NY 10022, Attn: Deborah Kovksy-Apap (deborah.kovksy@troutman.com).

**Failure to Respond.** A Response that is not filed and served in accordance with the procedures set forth herein may not be considered by the Court at the Hearing. Absent an agreement with the Debtors or the GUC Trustee, as applicable, resolving the Objection to a Claim, failure to timely file and serve a Response as set forth herein and appear at the Hearing may result in the Court granting the Objection without further notice or hearing. Upon entry of an order, affected creditors will be served with a notice of entry, and a copy, of the order.

### **Discovery Related to the Objection**

**Discovery.** If the Debtors or the GUC Trustee, as applicable, determine that discovery is necessary in advance of a hearing on an Objection, the Debtors or the GUC Trustee, as applicable, will serve notice on the affected claimant and its counsel of record of a scheduled hearing to be treated as a status conference during which the parties will request that the Court issue a scheduling order to facilitate dismissal or resolution of the litigation. Any such notice may be incorporated into the initial agenda letter for the hearing or may be provided by separate notice.

### **Additional Information**

**Additional Information.** Copies of these procedures, the Motion, the Order, or any other pleadings (the “Pleadings”) filed in these chapter 11 cases are available at no cost at the Debtors’ restructuring website: <https://www.veritaglobal.net/lavie>. You may also obtain copies of any of the pleadings filed in these chapter 11 cases for a fee at the Court’s website at [www.ganb.uscourts.gov](http://www.ganb.uscourts.gov).

**Reservation of Rights.** NOTHING IN ANY OMNIBUS OBJECTION OR OBJECTION NOTICE IS INTENDED OR SHALL BE DEEMED TO CONSTITUTE (A) AN ADMISSION AS TO THE VALIDITY OF ANY PREPETITION CLAIM AGAINST A DEBTOR ENTITY; (B) A WAIVER OF ANY RIGHT OF ANY DEBTOR OR THE GUC TRUSTEE, AS APPLICABLE, TO DISPUTE ANY PREPETITION CLAIM ON ANY GROUNDS, ASSERT COUNTERCLAIMS, RIGHTS OF OFFSET OR RECOUPMENT, DEFENSES, OBJECT TO CLAIMS (OR OTHER CLAIMS OR CAUSES OF ACTION OF A CLAIMANT) ON ANY GROUNDS NOT PREVIOUSLY RAISED IN AN OBJECTION, UNLESS THE COURT HAS ALLOWED A CLAIM OR ORDERED OTHERWISE, OR SEEK TO ESTIMATE ANY CLAIM AT A LATER DATE; (C) A PROMISE OR REQUIREMENT TO PAY ANY PREPETITION CLAIM; (D) AN IMPLICATION OR ADMISSION THAT ANY PARTICULAR CLAIM IS OF A TYPE SPECIFIED OR DEFINED IN THIS MOTION OR ANY ORDER GRANTING THE RELIEF REQUESTED BY THIS MOTION; (E) A REQUEST OR AUTHORIZATION TO ASSUME ANY PREPETITION AGREEMENT, CONTRACT, OR LEASE PURSUANT TO

SECTION 365 OF THE BANKRUPTCY CODE; OR (F) A WAIVER OF ANY RIGHT OF ANY DEBTOR OR THE GUC TRUSTEE, AS APPLICABLE, UNDER THE BANKRUPTCY CODE OR ANY OTHER APPLICABLE LAW.

Dated: [ ], 2025

**[DEBTORS/GUC TRUSTEE COUNSEL]**

/s/ DRAFT

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