

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

In re:)	
)	Chapter 11
)	
LAVIE CARE CENTERS, LLC, <i>et al.</i> , ¹)	Case No. 24-55507 (PMB)
)	
Debtors.)	(Jointly Administered)
)	
)	Obj. Deadline: 7/1/25 at 4:00 p.m. (ET)
)	Hr'g Date: 7/10/25 at 9:30 a.m. (ET)

NOTICE OF HEARING AND DEADLINE TO RESPOND TO
THE DEBTORS' NINTH OMNIBUS OBJECTION TO REQUESTS FOR PAYMENT OF
ADMINISTRATIVE EXPENSE CLAIMS UNDER 11 U.S.C. § 503(b)(9)
SET FORTH IN PROOFS OF CLAIM LISTED ON EXHIBIT A

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.

PLEASE BE AWARE THAT THE DEBTORS ARE ASKING THE COURT TO DISALLOW, REDUCE, OR RECLASSIFY 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 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 AND THEIR COUNSEL BY JULY 1, 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 JULY 1, 2025 AT 4:00 P.M. (PREVAILING EASTERN TIME), YOUR CLAIM MAY BE DISALLOWED, EXPUNGED, OR ELIMINATED WITHOUT FURTHER NOTICE OR HEARING.

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.



245550725052900000000004

A HEARING (THE “HEARING”) ON THE OBJECTION AND ANY RESPONSES FILED THERETO WILL TAKE PLACE ON JULY 10, 2025 AT 9:30 A.M. (PREVAILING EASTERN TIME) BEFORE THE HONORABLE PAUL M. BAISIER AT THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF GEORGIA, 75 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, 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. 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 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 seeking to **disallow/reclassify/reduce** your Claim(s) listed in the schedule attached hereto as Exhibit A on the grounds that your Claim(s) is/are not entitled to administrative priority under section 503(b)(9) of the Bankruptcy Code.

Objection Procedures. On May 22, 2025, the United States Bankruptcy Court for the Northern District of Georgia (the “Court”) entered an order [Docket No. 1003] 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 July 1, 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 copy of the same.

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.

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: May 29, 2025
Atlanta, Georgia

MCDERMOTT WILL & EMERY LLP

/s/ Daniel M. Simon

Daniel M. Simon (Georgia Bar No. 690075)
1180 Peachtree St. 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*)
444 West Lake Street, Suite 4000
Chicago, Illinois 60606
Telephone: (312) 372-2000
Facsimile: (312) 984-7700
Email: ekeil@mwe.com

Counsel for the Debtors and Debtors-in-Possession

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

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

**DEBTORS' NINTH OMNIBUS OBJECTION TO REQUESTS FOR PAYMENT OF
ADMINISTRATIVE EXPENSE CLAIMS UNDER 11 U.S.C. § 503(b)(9)
SET FORTH IN PROOFS OF CLAIM LISTED ON EXHIBIT A**

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

PLEASE BE AWARE THAT THE DEBTORS ARE ASKING THE COURT TO DISALLOW/REDUCE/RECLASSIFY 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 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 AND THEIR COUNSEL BY JULY 1, 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 JULY 1, 2025 AT 4:00 P.M. (PREVAILING EASTERN TIME), YOUR CLAIMS MAY BE DISALLOWED, REDUCED, EXPUNGED, OR ELIMINATED WITHOUT FURTHER NOTICE OR HEARING.

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

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.

LaVie Care Centers, LLC (“LaVie”) and certain of its affiliates and subsidiaries, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the “Debtors”), hereby submit this objection (this “Objection”) to the requests for payment of administrative expense claims pursuant to section 503(b)(9) (collectively, the “503(b)(9) Requests”) of chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) set forth in those certain proofs of claim set forth on **Exhibit A** attached hereto (collectively, the “Proofs of Claim”) filed by various respective claimants (collectively, the “Claimants”) and respectfully represent as follows:

RELIEF REQUESTED

2. By this Objection, the Debtors respectfully request entry of an order, substantially in the form attached hereto as **Exhibit B** (the “Proposed Order”), disallowing the 503(b)(9) Requests set forth in the Proofs of Claim because they do not assert a claim for goods delivered to the Debtors within twenty days prior to the Petition Date (as defined herein) as required by Bankruptcy Code section 503(b)(9) and reclassifying the 503(b)(9) Requests as non-priority, general unsecured claims.

JURISDICTION AND VENUE

3. The United States Bankruptcy Court for the Northern District of Georgia, Atlanta Division (the “Court”) has jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b). Venue of these cases and the Objection in this District is proper under 28 U.S.C. §§ 1408 and 1409.

4. The predicates for the relief requested herein are Bankruptcy Code sections 105 and 502, Rule 3007(d)(1) of the Federal Rules of Bankruptcy Procedures (the “Bankruptcy Rules”), Rule 3007-1 of the Local Rules of the United States Bankruptcy Court for the Northern District of Georgia (the “Local Rules”), and the *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 [Docket No. 1003] (the “Omnibus Claim Objection Procedures Order”).

BACKGROUND

I. The Chapter 11 Cases

5. On June 2, 2024 (the “Petition Date”), each Debtor commenced a case by filing a petition for relief under chapter 11 of the Bankruptcy Code (collectively, the “Chapter 11 Cases”) in the United States Bankruptcy Court for the Northern District of Georgia, Atlanta Division (the “Court”). The Debtors continue to operate their business and manage their property as debtors and debtors-in-possession pursuant to Bankruptcy Code sections 1107(a) and 1108. Additional information regarding the Debtors and these Chapter 11 Cases, including the Debtors’ business operations, capital structure, financial condition, and the reasons for and objectives of these Chapter 11 Cases, is set forth in the *Declaration of M. Benjamin Jones in Support of Chapter 11 Petitions and First Day Pleadings* [Docket No. 17].

6. On June 13, 2024, the Office of the United States Trustee for Region 21 (the “U.S. Trustee”) appointed an official committee in the Chapter 11 Cases (the “Committee”). *See Appointment and Notice of Appointment of Committee of Creditors Holding Unsecured Claims* [Docket No. 112]. To date, no trustee or examiner has been appointed in the Chapter 11 Cases.

7. On July 2, 2024, the Court entered the *Order (I) Establishing Bar Dates for Filing Claims Against the Debtors; and (II) Granting Related Relief* [Docket No. 218] (the “Bar Date Order”). The Bar Date Order (a) established August 30, 2024 at 5:00 p.m. (prevailing Eastern Time) (the “General Bar Date”) as the last day for creditors that are not governmental units to file proofs of claim, proofs of interest, and requests for payment of administrative expense claims under Bankruptcy Code section 503(b)(9); (b) established November 29, 2024 at 5:00 p.m. (prevailing Eastern Time) (the “Governmental Bar Date”) as the last day for creditors that are

governmental units to file proofs of claim, proofs of interest, and requests for payment of administrative expense claims under Bankruptcy Code section 503(b)(9); and (c) approved a form of bar date notice, proof of claim form, and other related procedures.

8. On November 14, 2024, the Court held a hearing on confirmation of the Debtors' proposed chapter 11 plan (the "Confirmation Hearing"). On December 5, 2024, the Court entered the *Findings of Fact, Conclusions of Law, and Order Approving on Final Basis and Confirming Debtors' Modified Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* [Docket No. 735] (the "Confirmation Order"), confirming the Debtors' *Modified Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* [Docket No. 730] (the "Plan"). As part of confirming the Plan, the Court also entered the *Memorandum Decision on Opt Out Third-Party Releases Included in Debtors' Joint Second Amended Plan of Reorganization* [Docket No. 736] (the "Confirmation Opinion").

9. On May 22, 2025, the Court entered the Omnibus Claim Objection Procedures Order, approving certain procedures for the Debtors and the GUC Trustee to utilize in filing various omnibus claim objections (collectively, the "Omnibus Claim Objection Procedures").

BASIS FOR RELIEF REQUESTED AND APPLICABLE AUTHORITY

10. Bankruptcy Code section 502 provides, in pertinent part, that "[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest . . . objects." 11 U.S.C. § 502(a). The debtor has a duty to object to the allowance of any claim that is improper. *See* 11 U.S.C. § 1107(a).

11. When asserting a proof of claim against a bankrupt estate, a claimant must allege facts that, if true, would support a finding that the debtor is legally liable to the claimant. *See In re Allegheny Int'l, Inc.*, 954 F.2d 167, 173 (3d Cir. 1992). Where the claimant alleges sufficient

facts to support its claim, its claim is afforded *prima facie* validity. *See id.*; *see also* Bankruptcy Rule 3001(f) (a properly executed and filed proof of claim “constitute[s] *prima facie* evidence of the validity and amount of the claim”).

12. A party wishing to dispute a claim’s validity must produce evidence sufficient to negate the claim’s *prima facie* validity. *See In re Allegheny Int’l, Inc.*, 954 F.2d at 173–74. Once an objecting party produces such evidence, the burden shifts back to the claimant to prove the validity of his or her claim by a preponderance of the evidence. *Id.* at 174; *see also Dollinger v. BV Retail, LLC (In re S&Q Shack, LLC)*, 2015 Bankr. LEXIS 1166, at *6-7 (N.D. Ga. Feb. 13, 2015); *Chambliss v. Oakwood Acceptance Corp. (In re Chambliss)*, 315 B.R. 166, 169 (Bankr. S.D. Ga. 2004). Ultimately, the burden of persuasion is on the claimant. *See In re Moss*, No. 94-11959, 1995 WL 17005342, at *1 (Bankr. S.D. Ga. Sept. 28, 1995).

13. Bankruptcy Code section 503(b)(9) grants administrative expense status for “the **value of any goods received by the debtor within 20 days before the date of commencement** of a case under this title in which the goods have been sold to the debtor in the ordinary course of such debtor’s business.” 11 U.S.C. § 503(b)(9) (emphasis added). The twentieth day prior to the Petition Date was May 13, 2024.

14. Bankruptcy Rule 3007(d)(1)-(2) permits objections to multiple claims to be joined in a single omnibus objection, subject to certain conditions, in an effort to streamline the claim objection process and allow debtors to efficiently challenge multiple claims in a single proceeding, thereby reducing procedural complexities and fostering judicial economy. *See generally* Fed. R. Bankr. P. 3007(d)(1)-(2). Bankruptcy Rule 3007(d)(2) provides that objections to more than one claim may be joined in a single objection if the objections are based solely on the grounds that the claims should be disallowed, in whole or in part, because they (a) duplicate other claims; (b) were

filed in the wrong case; (c) have been amended by later proofs of claim; (d) were not timely filed; (e) have been satisfied or released during the case; (f) were presented in a form that does not comply with applicable rules and the objector is therefore unable to determine a claim's validity; (g) are interests, not claims; or (h) assert a priority in an amount that exceeds the maximum amount allowable under Bankruptcy Code 507. *See* Fed. R. Bankr. P. 3007(d)(2)(A)-(H).

15. In addition to the grounds provided under Bankruptcy Rule 3007(d)(2), the Omnibus Claim Objection Procedures permit the Debtors and the GUC Trustee to file omnibus claim objections to multiple claims on additional grounds, including, among others, claims that 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. *See* Omnibus Claim Objection Procedures, at ¶ 1(d). The Omnibus Claim Objection Procedures also permit the Debtors and the GUC Trustee to object to more than 100 claims in a single objection, notwithstanding the procedural limitations set forth in Bankruptcy Rule 3007(e). *See* Omnibus Claim Objection Procedures Order, at ¶¶ 3-4.

16. Pursuant to Bankruptcy Code section 503(b)(9) and the Omnibus Claim Objection Procedures, the Debtors object to the 503(b)(9) Requests enumerated in the Proofs of Claim listed on **Exhibit A** hereto on the basis that they do not assert claims for goods delivered to the Debtors within twenty days prior to the Petition Date, as shown on the faces of the Proofs of Claim. Indeed, the Proofs of Claim assert that the amounts requested therein are either for services provided (as opposed to goods delivered) to the Debtors or for goods delivered to the Debtors on a date prior to May 13, 2024. Moreover, certain Proofs of Claim fail to attach materials or other substantiation sufficient to demonstrate the validity of the 503(b)(9) Requests. Therefore, the Debtors

respectfully request that the Court disallow the 503(b)(9) Requests identified on **Exhibit A** in their entirety and reclassify such amounts as non-priority, general unsecured claims.

RESERVATION OF RIGHTS

17. The Debtors reserve the right to object further to the 503(b)(9) Requests or the Proofs of Claim, as well as any other claim asserted by the Claimants, on any and all other substantive, non-substantive, legal, or factual grounds. Without limiting the generality of the foregoing, the Debtors specifically reserve the right to amend this Objection, file additional papers in support of this Objection, file a subsequent objection on any ground to the 503(b)(9) Requests if they are not disallowed and reclassified as requested herein or take other appropriate actions to (a) respond to any allegation or defense that may be raised in a response filed by or on behalf of the Claimants or other interested parties, (b) further object to the 503(b)(9) Requests and the Proofs of Claim for which Claimants provides (or attempts to provide) additional documentation or substantiation, or (c) further object to the 503(b)(9) Requests and the Proofs of Claim based on additional information that may be discovered upon further review by the Debtors or through discovery pursuant to the applicable provisions of Part VII of the Bankruptcy Rules. In addition, the Debtors reserve the right to object to all other claims and administrative expense priority requests filed in the Chapter 11 Cases.

NOTICE

18. The Debtors will provide notice of the Objection to: (a) the U.S. Trustee; (b) the GUC Trustee; (c) counsel to the GUC Trustee; and (d) the Claimants. The Debtors submit that no other or further notice is required.

NO PRIOR REQUEST

19. No previous request for the relief sought herein has been made to this or any other court.

COMPLIANCE WITH LOCAL RULE 3007-1

20. To the best of the Debtors' knowledge and belief, the Objection, including its exhibits, substantially complies with Local Rule 3007-1. To the extent that the Objection does not comply with the requirements of Local Rule 3007-1, the Debtors submit that the deviations are not material and respectfully request that those requirements be waived.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit B**, (i) disallowing entirely the 503(b)(9) Requests set forth in the Proofs of Claim and reclassifying such amounts as non-priority, general unsecured claims; and (ii) granting such other and further relief as the Court deems just and proper.

Dated: May 29, 2025
Atlanta, Georgia

MCDERMOTT WILL & EMERY LLP

/s/ Daniel M. Simon

Daniel M. Simon (Georgia Bar No. 690075)
1180 Peachtree St. 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*)
444 West Lake Street, Suite 4000
Chicago, Illinois 60606
Telephone: (312) 372-2000
Facsimile: (312) 984-7700
Email: ekeil@mwe.com

Counsel for the Debtors and Debtors-in-Possession

CERTIFICATE OF SERVICE

I hereby certify that on this date a true and correct copy of the foregoing Objection was served by the Court's CM/ECF system on all counsel of record registered in these Chapter 11 Cases through CM/ECF. The Debtors' claims and noticing agent will be simultaneously serving the foregoing document on the following parties via first class mail and/or electronic mail and will file a supplemental certificate of service on the docket to reflect the same.

ALTERNATE ELEVATOR SALES &
SERVICE LLC
1460 N. Goldenrod Road, Suite 125
Orlando, FL 32807
walvarado@alternateelevator.com

Bell Building Supply Inc.
402 East Lampkin St.
Starkville, MS 39759
foley@bellbuildingsupply.com

Cristina Cifuentes
Address on File

Cindy McGrath
Address on File

Coastal Doors Inc.
5872 NW 54th Circle
Coral Springs, FL 33607
coastaldoorsinc@gmail.com

Dr. John L. Cloninger III
Address on File

East Coast AP Marketing LLC
856 Lowcountry Blvd, Suite 100
Mt. Pleasant, SC 29464
billing@eastcoastap.com

East Coast AP Marketing LLC
75 Port City Landing Dr., Suite 110
Mt. Pleasant, SC 29464

Euler Hermes NA – Agent for Twin Med,
L.L.C.
100 International Dr., 22nd Floor
Baltimore, MD 21202
insolvency@allianz-trade.com

Jessica Fields
Address on File

Garden of Eden Florist
1740 E. Venice Ave., #17-18
Venice, FL 34292
floraldays@aol.com

Hattons Lawn Service Inc.
1430 College Ave., SW
Lenoir, NC 28645
hattonslawn@gmail.com

John Mott Enterprises, Inc.
5415 Galia St.
Sciotoville, OH
johnmottenterprises@yahoo.com

Lentz Septic Tank Service Inc.
410 Lentz Road
Statesville, NC 28625

NRG Business Marketing, LLC
804 Carnegie Center
1st Floor – Accounts Receivable
Princeton, NJ 08540
Alvin.barthe@nrg.com

Patricks Plumbing and Heating
Attn: Patrick Carlson
47023 Scout Camp Road
Atlantic Mine, MI 49905
patrick@up-hvac.com

Randolph Senior Adults Assoc.
Jolynn Hill, Finance Director
347 W. Salisbury St.
Asheboro, NC 27203
Jolynn.hill@senioradults.org

Esther Rodriguez
Address on File

Ross Jackson Plumbing Inc.
1506 Beeson Dr., NE

Brookhaven, MS39601
kim@rossjacksonplumbing.com
Signal Technologies
Attn: Jenny Stone
111 Centrum Drive
Irmo, SC 29063
jstone@signal-technologies.com

Skyview Energy LLC
P.O. Box 1400
Murphy, NC 28906
Heather.creamer@skyviewenergy.com

Skyview Energy LLC
PS Energy Group, Inc.
Roger W. Murray
4480 N. Shallowford Road, Suite 100
Dunwoody, GA 30338
Roger.murray@psenergy.com

Southern Air, Inc.
P.O. Box 4205
Lynchburg, VA24502

Staples, Inc.
Attn: Tom Riggelman
P.O. Box 102419
Columbia, SC 29224
Thomas.riggelman@staples.com

Staples, Inc.
Staples Business Advantage
Thomas D. Riggelman, Sr.
7 Technology Circle
Columbia, SC 29203
Thomas.riggelman@staples.com

Staples, Inc.
P.O. Box 105748
Atlanta, GA 30348
arremittance@staples.com

Summit Fire and Security LLC
1250 Northland Drive, Suite 200
Mendota Heights, MN 55120
mdvenezia@summitcompanies.com

Summit Fire and Security LLC
Accounts Receivable, Credit Department
P.O. Box 855227
Minneapolis, MN 55485
Ar-sfs@summitfiresecurity.com

Thermo Technics Air Conditioning Heating &
Refrige
3855 Dilg League Drive
Shreveport, LA 71109
thermotechnics@bellsouth.net

Yadkin Valley Economic Development District,
Inc.
P.O. Box 309
Boonville, NC 27011
jcockerham@yveddi.com

Yveddi Transportation Inc.
P.O. Box 309
Boonville, NC 27011
jcockerham@yveddi.com

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

Ryniker Consultants, LLC
Attn: Brian Ryniker
1178 Broadway, 3rd Floor #1505
New York, NY 10001
brian@rkcllc

Francis J. Lawall
Troutman Pepper Hamilton Sanders LLP
3000 Two Logan Square, Eighteenth and Arch
Street
Philadelphia, PA 19103-2799
francis.lawall@troutman.com

Deborah Kovsky-Apap
Troutman Pepper Hamilton Sanders LLP
875 Third Avenue
New York, NY 10022
deborah.kovsky@troutman.com

Dated: May 29, 2025
Atlanta, Georgia

MCDERMOTT WILL & EMERY LLP

/s/ Daniel M. Simon

Daniel M. Simon (Georgia Bar No. 690075)

1180 Peachtree St. NE, Suite 3350

Atlanta, Georgia 30309

Telephone: (404) 260-8535

Facsimile: (404) 393-5260

Email: dsimon@mwe.com

Counsel to Debtors and Debtors-in-Possession

EXHIBIT A

503(b)(9) Requests								
#	Claimant	Debtor	Case Number	Claim Number	503(b)(9) Request	Total Claim Amount	503(b)(9) Amount Objected to	Reason for Disallowance
1	ALTERNATE ELEVATOR SALES & SERVICE LLC	Catalina Gardens Health Care Associates, LLC	24-55616	1198	\$1,950.00	\$2,210.00	\$1,950.00	The Claimant's 503(b)(9) Request claims administrative priority for \$1,950.00 for "services performed." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
2	BELL BUILDING SUPPLY INC.	Starkville Manor HealthCare, LLC	24-55766	439	\$531.04	\$1,271.20	\$160.65	The Claimant's 503(b)(9) Request claims administrative priority for \$531.04 for "goods and materials sold." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request in part because certain of the invoices pre-date May 13, 2024, meaning that a portion of the goods sold were not delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9). Accordingly, the Debtors believe that this 503(b)(9) Request should be reduced to \$370.39 .
3	CIFUENTES, CRISTINA	LaVie Care Centers, LLC	24-55507	1159	\$564.84	\$564.87	\$564.84	The Claimant asserts \$564.84 for "services performed" entitled to priority treatment for unpaid wages without explanation and does not provide any documentation to support the same. Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as

503(b)(9) Requests								
#	Claimant	Debtor	Case Number	Claim Number	503(b)(9) Request	Total Claim Amount	503(b)(9) Amount Objected to	Reason for Disallowance
								required by Bankruptcy Code section 503(b)(9).
4	CLONINGER III, DR. JOHN L.	LaVie Care Centers, LLC	24-55507	5253	\$1,600.00	\$1,600.00	\$1,600.00	The Claimant's 503(b)(9) Request claims administrative priority for \$1,600.00 for "services performed." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
5	COASTAL DOORS INC.	LaVie Care Centers, LLC	24-55507	548	\$475.00	\$475.00	\$475.00	The Claimant's 503(b)(9) Request claims administrative priority for \$475.00 for "services performed on the automatic door." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
6	EAST COAST AP MARKETING LLC	Gateway HealthCare, LLC	24-55746	1122	\$1,115.21	\$1,115.21	\$815.21	The Claimant's 503(b)(9) Request claims administrative priority for \$1,115.21 for "goods sold." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request in part because one of the two invoices pre-dates May 13, 2024, meaning that a portion of the goods sold were not delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9). Moreover, the invoices contain shipping and setup charges that are not entitled to administrative priority. Accordingly,

503(b)(9) Requests								
#	Claimant	Debtor	Case Number	Claim Number	503(b)(9) Request	Total Claim Amount	503(b)(9) Amount Objected to	Reason for Disallowance
								the Debtors believe that this 503(b)(9) Request should be reduced to \$300.00 .
7	EAST COAST AP MARKETING LLC	Valley View HealthCare, LLC	24-55573	1262	\$1,016.08	\$1,016.08	\$527.58	The Claimant's 503(b)(9) Request claims administrative priority for \$1,016.08 for "goods sold." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request in part because one of the three invoices is dated postpetition, meaning that a portion of the goods sold were not delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9). Moreover, the invoices contain shipping and setup charges that are not entitled to administrative priority. Accordingly, the Debtors believe that this 503(b)(9) Request should be reduced to \$488.50 .
8	EAST COAST AP MARKETING LLC	Luther Ridge Facility Operations, LLC	24-55632	1265	\$300.13	\$300.13	\$300.13	The Claimant's 503(b)(9) Request claims administrative priority for \$300.13 for "goods sold." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because the invoice is dated February 2, 2024, meaning that the goods sold were not delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9). Moreover, the invoices contain shipping and setup charges that are not entitled to administrative priority.
9	EAST COAST AP MARKETING LLC	Glenburney HealthCare, LLC	24-55761	1350	\$1,386.03	\$1,386.03	\$1,386.03	The Claimant's 503(b)(9) Request claims administrative priority for \$1,386.03 for "goods sold." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because the invoice is dated April 11, 2024, meaning that the

503(b)(9) Requests								
#	Claimant	Debtor	Case Number	Claim Number	503(b)(9) Request	Total Claim Amount	503(b)(9) Amount Objected to	Reason for Disallowance
								goods sold were not delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9). Moreover, the invoices contain shipping and setup charges that are not entitled to administrative priority.
10	EULER HERMES N.A. – AGENT FOR TWIN MED, L.L.C.	Valley View HealthCare, LLC	24-55573	5116	\$3,712.69	\$57,556.55	\$207.69	The Claimant's 503(b)(9) Request, which was not timely filed, asserts administrative priority for \$3,712.69 for "goods and services." Proof of Claim, § 8. To the extent that the Court denies the Debtors' objection to the Proof of Claim on the basis that it was untimely (<i>see</i> Docket No. 947), the Debtors believe that the 503(b)(9) Request should be reduced to approximately \$3,505 to remove freight and other charges that are not associated with the costs of the goods provided.
11	EULER HERMES N.A. – AGENT FOR TWIN MED, L.L.C.	Wilora Lake HealthCare, LLC	24-55782	5211	\$5,252.58	\$62,713.23	\$176.00	The Claimant's 503(b)(9) Request, which was not timely filed, asserts administrative priority for \$5,252.58 for "goods and services." Proof of Claim, § 8. To the extent that the Court denies the Debtors' objection to the Proof of Claim on the basis that it was untimely (<i>see</i> Docket No. 947), the Debtors believe that the 503(b)(9) Request should be reduced to approximately \$5,077 to remove freight and other charges that are not associated with the costs of the goods provided.
12	EULER HERMES N.A. – AGENT FOR TWIN MED, L.L.C.	Winona Manor HealthCare, LLC	24-55784	5272	\$5,609.51	\$158,463.84	\$5,609.51	The Claimant's 503(b)(9) Request claims administrative priority for \$5,609.51 for "goods and services." Proof of Claim, § 8. The related

503(b)(9) Requests								
#	Claimant	Debtor	Case Number	Claim Number	503(b)(9) Request	Total Claim Amount	503(b)(9) Amount Objected to	Reason for Disallowance
								invoices were not provided with the Proof of Claim, which was not timely filed, and the Debtors are unable to tell whether the Claimant provided goods or services. To the extent that the Court denies the Debtors' objection to the Proof of Claim on the basis that it was untimely (<i>see</i> Docket No. 947), the Debtors object to this 503(b)(9) Request because, without more, it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
13	EULER HERMES N.A. – AGENT FOR TWIN MED, L.L.C.	Williamsburg Facility Operations, LLC	24-55771	5274	\$4,875.74	\$102,528.46	\$4,875.74	The Claimant's 503(b)(9) Request claims administrative priority for \$4,875.74 for "goods and services." Proof of Claim, § 8. The related invoices were not provided with the Proof of Claim, which was not timely filed, and the Debtors are unable to tell whether the Claimant provided goods or services. To the extent that the Court denies the Debtors' objection to the Proof of Claim on the basis that it was untimely (<i>see</i> Docket No. 947), the Debtors object to this 503(b)(9) Request because, without more, it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
14	FIELDS, JESSICA	LaVie Care Centers, LLC	24-55507	691	\$462.24	\$462.24	\$462.24	The Claimant's 503(b)(9) Request claims administrative priority for \$462.24 for "money withheld from wages." Proof of Claim, § 8. Ms. Fields was hired by the Debtors on 11/10/2020.

503(b)(9) Requests								
#	Claimant	Debtor	Case Number	Claim Number	503(b)(9) Request	Total Claim Amount	503(b)(9) Amount Objected to	Reason for Disallowance
								As a new hire, Ms. Fields elected to participate in the voluntary employee life insurance program up to \$80,000. This program is guaranteed issue as a new hire up to \$150,000. As a new hire, Ms. Fields also elected accident coverage for employee only. The cost of the voluntary employee life insurance program was \$4.06 per pay period and the accident coverage cost was \$4.50 per pay period. Ms. Fields submitted Evidence of Insurability for Spouse Voluntary Life in the amount of \$40,000. UNUM closed that request on 2/3/2022. Voluntary Spouse Life was never withheld from her paycheck. New Hire Enrollment for 2022 and 2023 were both passive. Existing benefit elections rolled over unless the employee completed Open Enrollment to make changes. Ms. Fields never completed Open Enrollment. As a result, Ms. Fields had \$80,000 in Voluntary Life and Accident Coverage Employee Only from 2/1/2021 through her last day of employment (6/23/2023). Accordingly, the Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
15	GARDEN OF EDEN FLORIST	1026 Albee Farm Road Operations LLC	24-55562	929	\$347.75	\$347.75	\$347.75	The Claimant's 503(b)(9) Request claims administrative priority for \$347.75 for "goods sold flowers." Proof of Claim, § 8. The Debtors object

503(b)(9) Requests								
#	Claimant	Debtor	Case Number	Claim Number	503(b)(9) Request	Total Claim Amount	503(b)(9) Amount Objected to	Reason for Disallowance
								to this 503(b)(9) Request because the invoices reflect delivery dates in 2017 and 2018, meaning that the goods were not delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
16	HATTONS LAWN SERVICE INC.	LaVie Care Centers, LLC	24-55507	505	\$1,836.00	\$1,836.00	\$1,836.00	The Claimant's 503(b)(9) Request claims administrative priority for \$1,836.00 for "services performed - mowing." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
17	JOHN MOTT ENTERPRISES, INC.	LaVie Care Centers, LLC	24-55507	835	\$430.00	\$430.00	\$430.00	The Claimant's 503(b)(9) Request claims administrative priority for \$430.00 for "services performed." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
18	LENTZ SEPTIC TANK SERVICE INC.	Willowbrook HealthCare, LLC	24-55781	495	\$325.00	\$325.00	\$325.00	The Claimant's 503(b)(9) Request claims administrative priority for \$325.00 for "services performed - grease tank cleaning." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as

503(b)(9) Requests								
#	Claimant	Debtor	Case Number	Claim Number	503(b)(9) Request	Total Claim Amount	503(b)(9) Amount Objected to	Reason for Disallowance
								required by Bankruptcy Code section 503(b)(9).
19	MCGRATH, CINDY	LaVie Care Centers, LLC	24-55507	5243	\$200.00	\$200.00	\$200.00	The Claimant's 503(b)(9) Request claims administrative priority for \$200.00 for "music services performed on site." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
20	NRG BUSINESS MARKETING, LLC	LaVie Care Centers, LLC	24-55507	2085	\$2,160.43	\$7,011.18	\$2,160.43	The Claimant's 503(b)(9) Request claims administrative priority for \$2,160.43 for "goods sold – natural gas services." Proof of Claim, § 8. The invoices were not provided with the Proof of Claim and the Debtors are unable to tell whether the Claimant provided goods or services to the Debtors. Without more, the Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
21	PATRICKS PLUMBING AND HEATING	Cypress Manor Health Care Associates, LLC	24-55538	2005	\$1,685.70	\$1,685.70	\$1,685.70	The Claimant's 503(b)(9) Request claims administrative priority for \$1,685.70 for "services performed." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).

503(b)(9) Requests								
#	Claimant	Debtor	Case Number	Claim Number	503(b)(9) Request	Total Claim Amount	503(b)(9) Amount Objected to	Reason for Disallowance
22	RANDOLPH SENIOR ADULTS ASSOCIATION	Westwood HealthCare, LLC	24-55665	797	\$1,538.16	\$1,538.16	\$1,538.16	The Claimant's 503(b)(9) Request claims administrative priority for \$1,538.16 for "transportation services performed." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
23	RODRIGUEZ, ESTHER	LaVie Care Centers, LLC	24-55507	852	\$2,280.00	\$2,280.00	\$2,280.00	The Claimant's 503(b)(9) Request claims administrative priority for \$2,280.00 for "120 PTO that was never given to me." Proof of Claim, § 8. No supporting materials or substantiation was provided in the Proof of Claim. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
24	ROSS JACKSON PLUMBING INC.	LaVie Care Centers, LLC	24-55507	783	\$967.84	\$967.84	\$967.84	The Claimant's 503(b)(9) Request claims administrative priority for \$967.84 for "service provided." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
25	SIGNAL TECHNOLOGIES	LaVie Care Centers, LLC	24-55507	154	\$1,048.63	\$1,048.63	\$1,048.63	The Claimant's 503(b)(9) Request claims administrative priority for \$1,048.63 for "services performed." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it

503(b)(9) Requests								
#	Claimant	Debtor	Case Number	Claim Number	503(b)(9) Request	Total Claim Amount	503(b)(9) Amount Objected to	Reason for Disallowance
								does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
26	SKYVIEW ENERGY LLC	Valley View HealthCare, LLC	24-55573	420	\$457.21	\$457.21	\$457.21	The Claimant's 503(b)(9) Request claims administrative priority for \$457.21 for "goods sold – diesel fuel for generator." Proof of Claim, § 8. However, the invoice reflects that the transaction date was July 20, 2023, meaning that this 503(b)(9) Request does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
27	SOUTHERN AIR, INC.	Kings Daughters Facility Operations, LLC	24-55564	1046	\$557.07	\$1,792.95	\$482.50	The Claimant's 503(b)(9) Request claims administrative priority for \$557.07 for "services performed." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request in part because the invoice provided reflects labor, trip, and fuel surcharges in addition to the cost of goods provided, which is only \$74.57. Accordingly, the Debtors believe that this 503(b)(9) Request should be reduced to <u>\$74.57</u> .
28	STAPLES, INC.	Perry Village Facility Operations, Inc.	24-55650	170	\$361.18	\$361.18	\$25.08	The Claimant's 503(b)(9) Request claims administrative priority for \$361.18 for "goods sold – office products." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request in part one of the invoices is dated postpetition. Accordingly, the Debtors believe that this 503(b)(9) Request should be reduced to <u>\$336.10</u> .

503(b)(9) Requests								
#	Claimant	Debtor	Case Number	Claim Number	503(b)(9) Request	Total Claim Amount	503(b)(9) Amount Objected to	Reason for Disallowance
29	STAPLES, INC.	Susquehanna Village Facility Operations, LLC	24-55774	173	\$225.34	\$1,747.66	\$225.34	The Claimant's 503(b)(9) Request claims administrative priority for \$225.34 for "goods sold – office products." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because no invoices were provided with the Proof of Claim, making it difficult to determine whether the goods sold were delivered within 20 days prior to the Petition Date.
30	SUMMIT FIRE AND SECURITY LLC	Ashland Facility Operations, LLC	24-55522	5275	\$1,967.00	\$6,050.14	\$1,967.00	The Claimant's 503(b)(9) Request claims administrative priority for \$1,967.00 for "fire equipment annual services, inspections, travel costs, and repairs." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
31	THERMO TECHNICS AIR CONDITIONING HEATING & REFRIGE	Garden Court HealthCare, LLC	24-55743	1186	\$1,751.46	\$1,751.46	\$1,751.46	The Claimant's 503(b)(9) Request claims administrative priority for \$1,751.46 for "services provided (a/c / heating)." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
32	YADKIN VALLEY ECONOMIC DEVELOPMENT DISTRICT, INC.	Willowbrook HealthCare, LLC	24-55781	1950	\$1,545.51	\$1,545.51	\$1,545.51	The Claimant's 503(b)(9) Request claims administrative priority for \$1,545.51 for "services provided, non-emergency transportation." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not

503(b)(9) Requests								
#	Claimant	Debtor	Case Number	Claim Number	503(b)(9) Request	Total Claim Amount	503(b)(9) Amount Objected to	Reason for Disallowance
								assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
33	YVEDDI TRANSPORTATION INC.	Willowbrook HealthCare, LLC	24-55781	1948	\$1,015.70	\$1,015.70	\$1,015.70	The Claimant's 503(b)(9) Request claims administrative priority for \$1,015.70 for "services provided, non-emergency transportation." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).

EXHIBIT B

Proposed Order

**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 No. __
)

**ORDER SUSTAINING DEBTORS' NINTH OMNIBUS OBJECTION TO REQUESTS
FOR PAYMENT OF ADMINISTRATIVE EXPENSE CLAIMS UNDER 11 U.S.C.
§ 503(b)(9) SET FORTH IN PROOFS OF CLAIM LISTED ON SCHEDULE 1**

*Upon the Debtors' Ninth Omnibus Objection to Request for Payment of Administrative
Expense Claims Under 11 U.S.C. § 503(b)(9) Set Forth in Proofs of Claim Listed on Exhibit A*

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.

[Docket No. [___]] (the “Objection”)² filed on May 29, 2025 by the above-captioned debtors and debtors-in-possession (collectively, the “Debtors”) for entry of an order disallowing the requests for payment of administrative expense claims under 11 U.S.C. § 503(b)(9) (collectively, the “503(b)(9) Requests”) set forth in the proofs of claim identified on **Schedule 1** attached hereto (collectively, the “Proofs of Claim”) and reclassifying the 503(b)(9) Requests to general unsecured claims, all as more fully set forth in the Objection; and the Court having jurisdiction over the Objection pursuant to 28 U.S.C. §§ 1334 and 157(b), the Objection being a core matter pursuant to 28 U.S.C. § 157(b)(2), the Court having found that venue of this proceeding and the Objection 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 Objection is in the best interests of the Debtors’ estates, their creditors, residents 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 Objection and any responses thereto for hearing on July 10, 2025 (the “Hearing”); and the Court having found that notice of the Objection and opportunity for hearing on the Objection 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 Objection and attend the Hearing to support any asserted response to the Objection; and no response to the Objection was filed and no creditor or party in interest appeared to oppose the relief requested in the Objection; and the Court having reviewed and considered the Objection and all other matters of record in these chapter 11 cases, including the lack of objection thereto; and it appearing that the relief requested in the Objection is in the best interests of the Debtors, their estates, and their

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Objection.

creditors, and that the legal and factual bases set forth in the Objection and at the Hearing 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 Objection is SUSTAINED and GRANTED as set forth herein.
2. The 503(b)(9) Requests set forth in the Proofs of Claim are hereby disallowed and reclassified as non-priority, general unsecured claims in Class 6A (OpCo General Unsecured Claims) or Class 6B (DivestCo General Unsecured Claims), as applicable.
3. For the avoidance of doubt, the Objection and this Order shall not waive, impair or bar the right of the Debtors (or any successors thereto) or the GUC Trustee to file one or more additional objections to the 503(b)(9) Requests or the Proofs of Claim on separate grounds.
4. The Debtors are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order.
5. 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

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 Debtors and Debtors-in-Possession

SCHEDULE 1

503(b)(9) Requests								
#	Claimant	Debtor	Case Number	Claim Number	503(b)(9) Request	Total Claim Amount	503(b)(9) Amount Objected to	Reason for Disallowance
1	ALTERNATE ELEVATOR SALES & SERVICE LLC	Catalina Gardens Health Care Associates, LLC	24-55616	1198	\$1,950.00	\$2,210.00	\$1,950.00	The Claimant's 503(b)(9) Request claims administrative priority for \$1,950.00 for "services performed." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
2	BELL BUILDING SUPPLY INC.	Starkville Manor HealthCare, LLC	24-55766	439	\$531.04	\$1,271.20	\$160.65	The Claimant's 503(b)(9) Request claims administrative priority for \$531.04 for "goods and materials sold." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request in part because certain of the invoices pre-date May 13, 2024, meaning that a portion of the goods sold were not delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9). Accordingly, the Debtors believe that this 503(b)(9) Request should be reduced to \$370.39 .
3	CIFUENTES, CRISTINA	LaVie Care Centers, LLC	24-55507	1159	\$564.84	\$564.87	\$564.84	The Claimant asserts \$564.84 for "services performed" entitled to priority treatment for unpaid wages without explanation and does not provide any documentation to support the same. Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as

503(b)(9) Requests								
#	Claimant	Debtor	Case Number	Claim Number	503(b)(9) Request	Total Claim Amount	503(b)(9) Amount Objected to	Reason for Disallowance
								required by Bankruptcy Code section 503(b)(9).
4	CLONINGER III, DR. JOHN L.	LaVie Care Centers, LLC	24-55507	5253	\$1,600.00	\$1,600.00	\$1,600.00	The Claimant's 503(b)(9) Request claims administrative priority for \$1,600.00 for "services performed." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
5	COASTAL DOORS INC.	LaVie Care Centers, LLC	24-55507	548	\$475.00	\$475.00	\$475.00	The Claimant's 503(b)(9) Request claims administrative priority for \$475.00 for "services performed on the automatic door." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
6	EAST COAST AP MARKETING LLC	Gateway HealthCare, LLC	24-55746	1122	\$1,115.21	\$1,115.21	\$815.21	The Claimant's 503(b)(9) Request claims administrative priority for \$1,115.21 for "goods sold." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request in part because one of the two invoices pre-dates May 13, 2024, meaning that a portion of the goods sold were not delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9). Moreover, the invoices contain shipping and setup charges that are not entitled to administrative priority. Accordingly,

503(b)(9) Requests								
#	Claimant	Debtor	Case Number	Claim Number	503(b)(9) Request	Total Claim Amount	503(b)(9) Amount Objected to	Reason for Disallowance
								the Debtors believe that this 503(b)(9) Request should be reduced to \$300.00 .
7	EAST COAST AP MARKETING LLC	Valley View HealthCare, LLC	24-55573	1262	\$1,016.08	\$1,016.08	\$527.58	The Claimant's 503(b)(9) Request claims administrative priority for \$1,016.08 for "goods sold." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request in part because one of the three invoices is dated postpetition, meaning that a portion of the goods sold were not delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9). Moreover, the invoices contain shipping and setup charges that are not entitled to administrative priority. Accordingly, the Debtors believe that this 503(b)(9) Request should be reduced to \$488.50 .
8	EAST COAST AP MARKETING LLC	Luther Ridge Facility Operations, LLC	24-55632	1265	\$300.13	\$300.13	\$300.13	The Claimant's 503(b)(9) Request claims administrative priority for \$300.13 for "goods sold." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because the invoice is dated February 2, 2024, meaning that the goods sold were not delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9). Moreover, the invoices contain shipping and setup charges that are not entitled to administrative priority.
9	EAST COAST AP MARKETING LLC	Glenburney HealthCare, LLC	24-55761	1350	\$1,386.03	\$1,386.03	\$1,386.03	The Claimant's 503(b)(9) Request claims administrative priority for \$1,386.03 for "goods sold." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because the invoice is dated April 11, 2024, meaning that the

503(b)(9) Requests								
#	Claimant	Debtor	Case Number	Claim Number	503(b)(9) Request	Total Claim Amount	503(b)(9) Amount Objected to	Reason for Disallowance
								goods sold were not delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9). Moreover, the invoices contain shipping and setup charges that are not entitled to administrative priority.
10	EULER HERMES N.A. – AGENT FOR TWIN MED, L.L.C.	Valley View HealthCare, LLC	24-55573	5116	\$3,712.69	\$57,556.55	\$207.69	The Claimant's 503(b)(9) Request, which was not timely filed, asserts administrative priority for \$3,712.69 for "goods and services." Proof of Claim, § 8. To the extent that the Court denies the Debtors' objection to the Proof of Claim on the basis that it was untimely (<i>see</i> Docket No. 947), the Debtors believe that the 503(b)(9) Request should be reduced to approximately \$3,505 to remove freight and other charges that are not associated with the costs of the goods provided.
11	EULER HERMES N.A. – AGENT FOR TWIN MED, L.L.C.	Wilora Lake HealthCare, LLC	24-55782	5211	\$5,252.58	\$62,713.23	\$176.00	The Claimant's 503(b)(9) Request, which was not timely filed, asserts administrative priority for \$5,252.58 for "goods and services." Proof of Claim, § 8. To the extent that the Court denies the Debtors' objection to the Proof of Claim on the basis that it was untimely (<i>see</i> Docket No. 947), the Debtors believe that the 503(b)(9) Request should be reduced to approximately \$5,077 to remove freight and other charges that are not associated with the costs of the goods provided.
12	EULER HERMES N.A. – AGENT FOR TWIN MED, L.L.C.	Winona Manor HealthCare, LLC	24-55784	5272	\$5,609.51	\$158,463.84	\$5,609.51	The Claimant's 503(b)(9) Request claims administrative priority for \$5,609.51 for "goods and services." Proof of Claim, § 8. The related

503(b)(9) Requests								
#	Claimant	Debtor	Case Number	Claim Number	503(b)(9) Request	Total Claim Amount	503(b)(9) Amount Objected to	Reason for Disallowance
								invoices were not provided with the Proof of Claim, which was not timely filed, and the Debtors are unable to tell whether the Claimant provided goods or services. To the extent that the Court denies the Debtors' objection to the Proof of Claim on the basis that it was untimely (<i>see</i> Docket No. 947), the Debtors object to this 503(b)(9) Request because, without more, it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
13	EULER HERMES N.A. – AGENT FOR TWIN MED, L.L.C.	Williamsburg Facility Operations, LLC	24-55771	5274	\$4,875.74	\$102,528.46	\$4,875.74	The Claimant's 503(b)(9) Request claims administrative priority for \$4,875.74 for "goods and services." Proof of Claim, § 8. The related invoices were not provided with the Proof of Claim, which was not timely filed, and the Debtors are unable to tell whether the Claimant provided goods or services. To the extent that the Court denies the Debtors' objection to the Proof of Claim on the basis that it was untimely (<i>see</i> Docket No. 947), the Debtors object to this 503(b)(9) Request because, without more, it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
14	FIELDS, JESSICA	LaVie Care Centers, LLC	24-55507	691	\$462.24	\$462.24	\$462.24	The Claimant's 503(b)(9) Request claims administrative priority for \$462.24 for "money withheld from wages." Proof of Claim, § 8. Ms. Fields was hired by the Debtors on 11/10/2020.

503(b)(9) Requests								
#	Claimant	Debtor	Case Number	Claim Number	503(b)(9) Request	Total Claim Amount	503(b)(9) Amount Objected to	Reason for Disallowance
								As a new hire, Ms. Fields elected to participate in the voluntary employee life insurance program up to \$80,000. This program is guaranteed issue as a new hire up to \$150,000. As a new hire, Ms. Fields also elected accident coverage for employee only. The cost of the voluntary employee life insurance program was \$4.06 per pay period and the accident coverage cost was \$4.50 per pay period. Ms. Fields submitted Evidence of Insurability for Spouse Voluntary Life in the amount of \$40,000. UNUM closed that request on 2/3/2022. Voluntary Spouse Life was never withheld from her paycheck. New Hire Enrollment for 2022 and 2023 were both passive. Existing benefit elections rolled over unless the employee completed Open Enrollment to make changes. Ms. Fields never completed Open Enrollment. As a result, Ms. Fields had \$80,000 in Voluntary Life and Accident Coverage Employee Only from 2/1/2021 through her last day of employment (6/23/2023). Accordingly, the Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
15	GARDEN OF EDEN FLORIST	1026 Albee Farm Road Operations LLC	24-55562	929	\$347.75	\$347.75	\$347.75	The Claimant's 503(b)(9) Request claims administrative priority for \$347.75 for "goods sold flowers." Proof of Claim, § 8. The Debtors object

503(b)(9) Requests								
#	Claimant	Debtor	Case Number	Claim Number	503(b)(9) Request	Total Claim Amount	503(b)(9) Amount Objected to	Reason for Disallowance
								to this 503(b)(9) Request because the invoices reflect delivery dates in 2017 and 2018, meaning that the goods were not delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
16	HATTONS LAWN SERVICE INC.	LaVie Care Centers, LLC	24-55507	505	\$1,836.00	\$1,836.00	\$1,836.00	The Claimant's 503(b)(9) Request claims administrative priority for \$1,836.00 for "services performed - mowing." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
17	JOHN MOTT ENTERPRISES, INC.	LaVie Care Centers, LLC	24-55507	835	\$430.00	\$430.00	\$430.00	The Claimant's 503(b)(9) Request claims administrative priority for \$430.00 for "services performed." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
18	LENTZ SEPTIC TANK SERVICE INC.	Willowbrook HealthCare, LLC	24-55781	495	\$325.00	\$325.00	\$325.00	The Claimant's 503(b)(9) Request claims administrative priority for \$325.00 for "services performed - grease tank cleaning." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as

503(b)(9) Requests								
#	Claimant	Debtor	Case Number	Claim Number	503(b)(9) Request	Total Claim Amount	503(b)(9) Amount Objected to	Reason for Disallowance
								required by Bankruptcy Code section 503(b)(9).
19	MCGRATH, CINDY	LaVie Care Centers, LLC	24-55507	5243	\$200.00	\$200.00	\$200.00	The Claimant's 503(b)(9) Request claims administrative priority for \$200.00 for "music services performed on site." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
20	NRG BUSINESS MARKETING, LLC	LaVie Care Centers, LLC	24-55507	2085	\$2,160.43	\$7,011.18	\$2,160.43	The Claimant's 503(b)(9) Request claims administrative priority for \$2,160.43 for "goods sold – natural gas services." Proof of Claim, § 8. The invoices were not provided with the Proof of Claim and the Debtors are unable to tell whether the Claimant provided goods or services to the Debtors. Without more, the Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
21	PATRICKS PLUMBING AND HEATING	Cypress Manor Health Care Associates, LLC	24-55538	2005	\$1,685.70	\$1,685.70	\$1,685.70	The Claimant's 503(b)(9) Request claims administrative priority for \$1,685.70 for "services performed." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).

503(b)(9) Requests								
#	Claimant	Debtor	Case Number	Claim Number	503(b)(9) Request	Total Claim Amount	503(b)(9) Amount Objected to	Reason for Disallowance
22	RANDOLPH SENIOR ADULTS ASSOCIATION	Westwood HealthCare, LLC	24-55665	797	\$1,538.16	\$1,538.16	\$1,538.16	The Claimant's 503(b)(9) Request claims administrative priority for \$1,538.16 for "transportation services performed." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
23	RODRIGUEZ, ESTHER	LaVie Care Centers, LLC	24-55507	852	\$2,280.00	\$2,280.00	\$2,280.00	The Claimant's 503(b)(9) Request claims administrative priority for \$2,280.00 for "120 PTO that was never given to me." Proof of Claim, § 8. No supporting materials or substantiation was provided in the Proof of Claim. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
24	ROSS JACKSON PLUMBING INC.	LaVie Care Centers, LLC	24-55507	783	\$967.84	\$967.84	\$967.84	The Claimant's 503(b)(9) Request claims administrative priority for \$967.84 for "service provided." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
25	SIGNAL TECHNOLOGIES	LaVie Care Centers, LLC	24-55507	154	\$1,048.63	\$1,048.63	\$1,048.63	The Claimant's 503(b)(9) Request claims administrative priority for \$1,048.63 for "services performed." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it

503(b)(9) Requests								
#	Claimant	Debtor	Case Number	Claim Number	503(b)(9) Request	Total Claim Amount	503(b)(9) Amount Objected to	Reason for Disallowance
								does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
26	SKYVIEW ENERGY LLC	Valley View HealthCare, LLC	24-55573	420	\$457.21	\$457.21	\$457.21	The Claimant's 503(b)(9) Request claims administrative priority for \$457.21 for "goods sold – diesel fuel for generator." Proof of Claim, § 8. However, the invoice reflects that the transaction date was July 20, 2023, meaning that this 503(b)(9) Request does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
27	SOUTHERN AIR, INC.	Kings Daughters Facility Operations, LLC	24-55564	1046	\$557.07	\$1,792.95	\$482.50	The Claimant's 503(b)(9) Request claims administrative priority for \$557.07 for "services performed." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request in part because the invoice provided reflects labor, trip, and fuel surcharges in addition to the cost of goods provided, which is only \$74.57. Accordingly, the Debtors believe that this 503(b)(9) Request should be reduced to <u>\$74.57</u> .
28	STAPLES, INC.	Perry Village Facility Operations, Inc.	24-55650	170	\$361.18	\$361.18	\$25.08	The Claimant's 503(b)(9) Request claims administrative priority for \$361.18 for "goods sold – office products." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request in part one of the invoices is dated postpetition. Accordingly, the Debtors believe that this 503(b)(9) Request should be reduced to <u>\$336.10</u> .

503(b)(9) Requests								
#	Claimant	Debtor	Case Number	Claim Number	503(b)(9) Request	Total Claim Amount	503(b)(9) Amount Objected to	Reason for Disallowance
29	STAPLES, INC.	Susquehanna Village Facility Operations, LLC	24-55774	173	\$225.34	\$1,747.66	\$225.34	The Claimant's 503(b)(9) Request claims administrative priority for \$225.34 for "goods sold – office products." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because no invoices were provided with the Proof of Claim, making it difficult to determine whether the goods sold were delivered within 20 days prior to the Petition Date.
30	SUMMIT FIRE AND SECURITY LLC	Ashland Facility Operations, LLC	24-55522	5275	\$1,967.00	\$6,050.14	\$1,967.00	The Claimant's 503(b)(9) Request claims administrative priority for \$1,967.00 for "fire equipment annual services, inspections, travel costs, and repairs." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
31	THERMO TECHNICS AIR CONDITIONING HEATING & REFRIGE	Garden Court HealthCare, LLC	24-55743	1186	\$1,751.46	\$1,751.46	\$1,751.46	The Claimant's 503(b)(9) Request claims administrative priority for \$1,751.46 for "services provided (a/c / heating)." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
32	YADKIN VALLEY ECONOMIC DEVELOPMENT DISTRICT, INC.	Willowbrook HealthCare, LLC	24-55781	1950	\$1,545.51	\$1,545.51	\$1,545.51	The Claimant's 503(b)(9) Request claims administrative priority for \$1,545.51 for "services provided, non-emergency transportation." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not

503(b)(9) Requests								
#	Claimant	Debtor	Case Number	Claim Number	503(b)(9) Request	Total Claim Amount	503(b)(9) Amount Objected to	Reason for Disallowance
								assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).
33	YVEDDI TRANSPORTATION INC.	Willowbrook HealthCare, LLC	24-55781	1948	\$1,015.70	\$1,015.70	\$1,015.70	The Claimant's 503(b)(9) Request claims administrative priority for \$1,015.70 for "services provided, non-emergency transportation." Proof of Claim, § 8. The Debtors object to this 503(b)(9) Request because it does not assert a claim for the value of goods delivered to the Debtors within twenty days prior to the Petition Date as required by Bankruptcy Code section 503(b)(9).

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

ALTERNATE ELEVATOR SALES & SERVICE
LLC
1460 N. Goldenrod Road, Suite 125
Orlando, FL 32807
walvarado@alternateelevator.com

Bell Building Supply Inc.
402 East Lampkin St.
Starkville, MS 39759
foley@bellbuildingsupply.com

Cristina Cifuentes
Address on File

Cindy McGrath
Address on File

Coastal Doors Inc.
5872 NW 54th Circle
Coral Springs, FL 33607
coastaldoorsinc@gmail.com

Dr. John L. Cloninger III
Address on File

East Coast AP Marketing LLC
856 Lowcountry Blvd, Suite 100
Mt. Pleasant, SC 29464
billing@eastcoastap.com

East Coast AP Marketing LLC
75 Port City Landing Dr., Suite 110
Mt. Pleasant, SC 29464

Euler Hermes NA – Agent for Twin Med,
L.L.C.
100 International Dr., 22nd Floor
Baltimore, MD 21202
insolvency@allianz-trade.com

Jessica Fields
Address on File

Garden of Eden Florist
1740 E. Venice Ave., #17-18
Venice, FL 34292
floraldays@aol.com

Hattons Lawn Service Inc.
1430 College Ave., SW
Lenoir, NC 28645
hattonslawn@gmail.com

John Mott Enterprises, Inc.
5415 Galia St.
Sciotoville, OH
johnmottenterprises@yahoo.com

Lentz Septic Tank Service Inc.
410 Lentz Road
Statesville, NC 28625

NRG Business Marketing, LLC
804 Carnegie Center
1st Floor – Accounts Receivable
Princeton, NJ 08540
Alvin.barthe@nrg.com

Patricks Plumbing and Heating
Attn: Patrick Carlson
47023 Scout Camp Road
Atlantic Mine, MI 49905
patrick@up-hvac.com

Randolph Senior Adults Assoc.
Jolynn Hill, Finance Director
347 W. Salisbury St.
Asheboro, NC 27203
Jolynn.hill@senioradults.org

Esther Rodriguez
Address on File

Ross Jackson Plumbing Inc.
1506 Beeson Dr., NE
Brookhaven, MS39601
kim@rossjacksonplumbing.com
Signal Technologies
Attn: Jenny Stone
111 Centrum Drive
Irmo, SC 29063
jstone@signal-technologies.com

Skyview Energy LLC
P.O. Box 1400
Murphy, NC 28906
Heather.creamer@skyviewenergy.com

Skyview Energy LLC
PS Energy Group, Inc.
Roger W. Murray
4480 N. Shallowford Road, Suite 100
Dunwoody, GA 30338
Roger.murray@psenergy.com

Southern Air, Inc.
P.O. Box 4205
Lynchburg, VA24502

Staples, Inc.
Attn: Tom Riggleman
P.O. Box 102419
Columbia, SC 29224
Thomas.riggleman@staples.com

Staples, Inc.
Staples Business Advantage
Thomas D. Riggleman, Sr.
7 Technology Circle
Columbia, SC 29203

Thomas.riggleman@staples.com

Staples, Inc.
P.O. Box 105748
Atlanta, GA 30348
arremittance@staples.com

Summit Fire and Security LLC
1250 Northland Drive, Suite 200
Mendota Heights, MN 55120
mdvenezia@summitcompanies.com

Summit Fire and Security LLC
Accounts Receivable, Credit Department
P.O. Box 855227
Minneapolis, MN 55485
Ar-sfs@summitfiresecurity.com

Thermo Technics Air Conditioning Heating
& Refrige
3855 Dilg League Drive
Shreveport, LA 71109
thermotechnics@bellsouth.net

Yadkin Valley Economic Development
District, Inc.
P.O. Box 309
Boonville, NC 27011
jcockerham@yveddi.com

Yveddi Transportation Inc.
P.O. Box 309
Boonville, NC 27011
jcockerham@yveddi.com

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

Ryniker Consultants, LLC
Attn: Brian Ryniker
1178 Broadway, 3rd Floor #1505
New York, NY 10001
brian@rkc.llc

Francis J. Lawall
Troutman Pepper Hamilton Sanders LLP
3000 Two Logan Square, Eighteenth and
Arch Street
Philadelphia, PA 19103-2799
francis.lawall@troutman.com

Deborah Kovsky-Apap
Troutman Pepper Hamilton Sanders LLP
875 Third Avenue
New York, NY 10022
deborah.kovsky@troutman.com