

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 DEBTORS' ELEVENTH
OMNIBUS OBJECTION TO 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, RECLASSIFY, OR REDUCE 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, REDUCED, RECLASSIFIED, EXPUNGED, OR ELIMINATED WITHOUT FURTHER NOTICE OR HEARING.

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

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.



2455507250529000000000006

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](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 **reclassify/reduce/disallow** your Claim(s) listed in the schedule attached hereto as **Exhibit A** on the grounds that your Claim(s) is/are not entitled to priority under section 507 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

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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)
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Debtors.)	(Jointly Administered)
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**DEBTORS' ELEVENTH OMNIBUS OBJECTION
TO PROOFS OF CLAIM LISTED ON EXHIBIT A**

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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 those certain proofs of claim set forth on Exhibit A attached hereto (collectively, the “Asserted Priority Claims”) 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”), reclassifying the Asserted Priority Claims set forth on Exhibit A as non-priority, general unsecured claims as set forth therein.

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 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).

14. 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 on additional grounds, including, among others, claims that are incorrectly or improperly classified as, among others, claims entitled to improper priority treatment under the Bankruptcy Code or claims with an asserted but unperfected or invalid security interest against the Debtors. *See* Omnibus Claim Objection Procedures, at ¶ 1(c). 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.

15. Bankruptcy Code section 507(a) sets forth various grounds for priority treatment of unsecured claims, including, among others, (a) domestic support obligations (including alimony and child support); (b) deposits toward purchase, lease, or rental of property of services for personal, family or household use; (c) wages, salaries, or commissions earned within 180 days before the Petition Date; and (d) taxes or penalties owed to governmental units; (e) contributions to an employee benefit plan. *See* 11 U.S.C. § 507(a). The Asserted Priority Claims claim priority treatment pursuant to one of the foregoing prongs of Bankruptcy Code section 507(a).

16. Pursuant to the Omnibus Claim Objection Procedures, the Debtors have reviewed the Asserted Priority Claims and determined that each of the Asserted Priority Claims identified on **Exhibit A** hereto are not entitled to the asserted priority treatment pursuant to Bankruptcy Code section 507. To allow the Asserted Priority Claims to remain on the claims register as filed would lead to unwarranted recoveries to the detriment of other similarly situated creditors. Accordingly, the Debtors hereby object to the Asserted Priority Claims and respectfully request that the Court

reclassify each Asserted Priority Claim to a non-priority, general unsecured claim as set forth on **Exhibit A**.

RESERVATION OF RIGHTS

17. The Debtors reserve the right to object further to the Asserted Priority Claims, 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 Asserted Priority Claims 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 Claimant or other interested parties, (b) further object to the Asserted Priority Claims for which Claimant provides (or attempts to provide) additional documentation or substantiation, or (c) further object to the Asserted Priority Claims 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) reclassifying the Asserted Priority Claims as non-priority, general unsecured claims as set forth on **Exhibit A** hereto and (ii) granting such other relief as the Court deems just, equitable, and proper.

Dated: May 29, 2025
Atlanta, Georgia

MCDERMOTT WILL & EMERY LLP

/s/ Daniel M. Simon

Daniel M. Simon (Georgia Bar No. 690075)
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- and -

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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.

A PERFECT CHOICE HOME CARE LLC
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brandi@aperfectchoice.care

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RJesussave@aol.com

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Address on File

CRISTINA CIFUENTES
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Cindy McGrath
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Linda M. Welsh
Address on File

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economyplumbing@northstate.net

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Dated: May 29, 2025
Atlanta, Georgia

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/s/ Daniel M. Simon

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1180 Peachtree St. NE, Suite 3350
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Facsimile: (404) 393-5260
Email: dsimon@mwe.com

Counsel to Debtors and Debtors-in-Possession

EXHIBIT A

Asserted Priority Claims							
#	Claimant	Debtor	Case Number	Claim Number	Priority Claim Amount	Reclassification	Reason for Reclassification
1	A PERFECT CHOICE HOME CARE LLC	LaVie Care Centers, LLC	24-55507	5080	\$6,258.89	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for “services performed.” The Claimant seeks priority treatment as a wage claim under Bankruptcy Code section 507(a)(4), but the Claimant was a third-party service provider, not an employee on the payroll of the Debtors. Thus, there is no basis for an allowed priority claim and Claim No. 5080 should be reclassified as a general unsecured claim. Additionally, the claim was filed after the General Bar Date and therefore should be disallowed in its entirety, as reflected in the <i>Debtors’ Third Omnibus Objection to Late-Filed Claims</i> [Docket No. 947].
2	CAROLINA POWER SOLUTION CORPORATION	LaVie Care Centers, LLC	24-55507	1200	\$130.31	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for “services performed.” The Claimant seeks treatment of the taxes charged for the services performed as a taxes or penalties priority claim under Bankruptcy Code section 507(a)(8), but the Claimant was a third-party service provider, not a governmental unit asserting payment of taxes or penalties. Thus, there is no basis for an allowed priority claim and this portion of Claim No. 1200 should be reclassified as a general unsecured claim.
3	CIFUENTES, CRISTINA	LaVie Care Centers, LLC	24-55507	1159	\$564.84	OpCo General Unsecured Claim (Class 6A)	As set forth in the <i>Debtors’ Sixth Omnibus Objection to Unsubstantiated Claims</i> [Docket No. 971], the Claimant asserts an amount for “services performed” entitled to priority treatment for unpaid wages without explanation and does not provide any documentation to support the same. Without more, the Debtors do not have a basis for an allowed priority claim.

Asserted Priority Claims							
#	Claimant	Debtor	Case Number	Claim Number	Priority Claim Amount	Reclassification	Reason for Reclassification
4	ECONOMY PLUMBING SERVICES, INC.	Westwood HealthCare, LLC	24-55665	1833	\$138.43	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for “plumbing services performed.” The Claimant seeks treatment as a wage claim under Bankruptcy Code section 507(a)(4), but the Claimant was a third-party service provider, not an employee on the payroll of the Debtors. Thus, there is no basis for an allowed priority claim pursuant to Bankruptcy Code section 507(a)(4) and Claim No. 1833 should be reclassified as a general unsecured claim.
5	FOOTHILLS ELECTRIC SERVICE	LaVie Care Centers, LLC	24-55507	792	\$640.00	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for electrical repairs provided to the Debtors. The Claimant seeks treatment as a taxes or penalties priority claim under Bankruptcy Code section 507(a)(8), but the Claimant was a third-party service provider, not a governmental unit asserting a tax claim against the Debtors; thus, there is no basis for an allowed priority claim and Claim No. 792 should be reclassified as a general unsecured claim.
6	G.C.A.B. STAFFING LLC	Penn Village Facility Operations, LLC	24-55627	1871	\$28,353.72	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for staffing services provided to the Debtors. The Claimant seeks treatment as a priority wage claim under Bankruptcy Code section 507(a)(4), but the Claimant was a third-party staffing agency, not an employee on the payroll of the Debtors. Thus, there is no basis for an allowed priority claim pursuant to Bankruptcy Code section 507(a)(4) and Claim No. 1871 should be reclassified as a general unsecured claim.
7	GOOD HANDS TRANSPORTATION	LaVie Care Centers, LLC	24-55507	917	\$2,155.00	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for “services performed.” The Claimant seeks priority treatment as a wage claim under Bankruptcy Code section 507(a)(4), but the Claimant was a third-party service provider, not an employee on the payroll of the Debtors. Thus, there is no basis for an allowed priority claim and

Asserted Priority Claims							
#	Claimant	Debtor	Case Number	Claim Number	Priority Claim Amount	Reclassification	Reason for Reclassification
							Claim No. 917 should be reclassified to a general unsecured claim.
8	GRAIN COAST LLC	Hunter Woods HealthCare, LLC	24-55519	5075	\$54,656.40	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for “healthcare transportation services.” The Claimant seeks priority treatment as a wage claim under Bankruptcy Code section 507(a)(4), but the Claimant was a third-party service provider, not an employee on the payroll of the Debtors; thus, there is no basis for an allowed priority claim pursuant to Bankruptcy Code section 507(a)(4) and should be reclassified as a general unsecured claim. Additionally, the claim was filed after the General Bar Date and therefore should be disallowed in its entirety, as reflected in the <i>Debtors’ Third Omnibus Objection to Late-Filed Claims</i> [Docket No. 947].
9	ICE, ASHLEY	LaVie Care Centers, LLC	24-55507	191	\$3,350.00	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts \$3,350.00 for “401k” and seeks priority treatment pursuant to Bankruptcy Code section 507(a)(7) deposits toward purchase, lease, or rental of property without explanation. On its face, the Claim does not qualify for priority treatment pursuant to Bankruptcy Code section 507(a)(7); thus, there is no basis for an allowed priority claim.
10	LITTLE RIVER MEDICAL LLC	LaVie Care Centers, LLC	24-55507	426	\$12,000.00	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts \$12,000.00 for “four monthly medical director payments” and seeks priority treatment as a wage claim under Bankruptcy Code section 507(a)(4). However, the Claimant was an independent contractor, specifically a medical director, not an employee on the payroll of the Debtors; thus, there is no basis for an allowed priority claim pursuant to Bankruptcy Code section 507(a)(4) and Claim No. 426 should be reclassified as a general unsecured claim.
11	MARTONE, GIULIANA	Locust Grove Facility Operations, LLC	24-55602	771	\$860.00	OpCo General Unsecured Claim	The Claimant asserts an amount owed for prepetition cosmetology services provided to the

Asserted Priority Claims							
#	Claimant	Debtor	Case Number	Claim Number	Priority Claim Amount	Reclassification	Reason for Reclassification
						(Class 6A)	Debtors. The Claimant seeks treatment as a wage claim under Bankruptcy Code section 507(a)(4), but the Claimant was a third-party service provider, not an employee on the payroll of the Debtors. Thus, there is no basis for an allowed priority claim pursuant to Bankruptcy Code section 507(a)(4) and Claim No. 771 should be reclassified as a general unsecured claim.
12	MARTONE, GIULIANA	Penn Village Facility Operations, LLC	24-55627	772	\$1,713.00	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for prepetition cosmetology services provided to the Debtors. The Claimant seeks treatment as a wage claim under Bankruptcy Code section 507(a)(4), but the Claimant was a third-party service provider, not an employee on the payroll of the Debtors. Thus, there is no basis for an allowed priority claim pursuant to Bankruptcy Code section 507(a)(4) and Claim No. 772 should be reclassified as a general unsecured claim.
13	MATTOX, MARIE A., F/B/O CARRIE RHODES	Tallahassee Facility Operations, LLC	24-55777	5250	\$10,000.00	DivestCo General Unsecured Claim (Class 6B)	The Claimant asserts amount owed for prepetition settlement agreement payments. Claimant seeks priority treatment in part as a wage claim under Bankruptcy Code section 507(a)(4) and in part by checking “other” on the claim form without specifying another section of Bankruptcy Code section 507(a), but Claimant was a party to a settlement agreement with the Debtors, not an employee of the Debtors. Thus, there is no basis for an allowed priority claim against the Debtors and Claim 5250 is more aptly a general unsecured claim. However, the claim was filed after the General Bar Date and therefore should be disallowed in its entirety, as reflected in the <i>Debtors’ Third Omnibus Objection to Late-Filed Claims</i> [Docket No. 947].
14	MCGRATH, CINDY	LaVie Care Centers, LLC	24-55507	5243	\$200.00	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts amount owed for “music services performed.” The Claimant seeks priority treatment as a wage claim under Bankruptcy

Asserted Priority Claims							
#	Claimant	Debtor	Case Number	Claim Number	Priority Claim Amount	Reclassification	Reason for Reclassification
							Code section 507(a)(4), but the Claimant was a third-party service provider, not an employee of the Debtors; thus, there is no basis for an allowed priority claim. Additionally, the claim was filed after the General Bar Date and therefore should be disallowed in its entirety, as reflected in the <i>Debtors' Third Omnibus Objection to Late-Filed Claims</i> [Docket No. 947].
15	MCKIBBEN, EVERETT CECIL	LaVie Care Centers, LLC	24-55507	690	\$4,000.00	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts \$4,000.00 for "services performed" and seeks priority treatment as a wage claim under Bankruptcy Code section 507(a)(4). However, the Claimant was an independent contractor, specifically a medical director, not an employee on the payroll of the Debtors; thus, there is no basis for an allowed priority claim pursuant to Bankruptcy Code section 507(a)(4) and Claim 690 should be reclassified as a general unsecured claim.
16	NAGAMATSU, CHERYL	LaVie Care Centers, LLC	24-55507	161	\$495.00	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for prepetition cosmetology services provided to the Debtors. The Claimant seeks treatment as a wage claim under Bankruptcy Code section 507(a)(4); however, the Claimant was a third-party service provider, not an employee on the payroll of the Debtors. Thus, there is no basis for an allowed priority claim pursuant to Bankruptcy Code section 507(a)(4) and should be reclassified as a general unsecured claim.
17	QUINN, PAIGE	LaVie Care Centers, LLC	24-55507	112	\$475.00	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for prepetition cosmetology services provided to the Debtors. The Claimant seeks priority treatment under Bankruptcy Code section 507(a), but the Claimant does not provide a sufficient basis for such treatment. Moreover, the Claimant was a third-party service provider to the Debtors, not an employee of the Debtors; thus, there is no basis for an allowed priority claim under Bankruptcy

Asserted Priority Claims							
#	Claimant	Debtor	Case Number	Claim Number	Priority Claim Amount	Reclassification	Reason for Reclassification
							Code section 507(a)(4) and Claim No. 112 should be reclassified as a general unsecured claim.
18	RLS HOMECHOICE AND STAFFING, INC.	LaVie Care Centers, LLC	24-55507	1835	\$42,574.31	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for “services performed” pursuant to a client staffing agreement. The Claimant seeks priority treatment as a wage claim under Bankruptcy Code section 507(a)(4), but Claimant was a third-party service provider, not an employee on the payroll of the Debtors. Thus, there is no basis for an allowed priority claim pursuant to Bankruptcy Code section 507(a)(4) and Claim No. 1835 should be reclassified to a general unsecured claim.
19	RLS HOMECHOICE AND STAFFING, INC.	LaVie Care Centers, LLC	24-55507	5164	\$42,574.31	OpCo General Unsecured Claim (Class 6A)	The Debtors believe that this is a late-filed claim that is duplicative of Claim No. 1835 and reiterate the objections set forth above.
20	ROSE, TRACY	LaVie Care Centers, LLC	24-55507	117	\$952.70	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for prepetition cosmetology services provided to the Debtors. The Claimant seeks treatment as a wage claim under Bankruptcy Code section 507(a)(4); however, the Claimant was a third-party service provider, not an employee on the payroll of the Debtors. Thus, there is no basis for an allowed priority claim pursuant to Bankruptcy Code section 507(a)(4) and Claim No. 117 should be reclassified as a general unsecured claim.
21	ROSE, TRACY	LaVie Care Centers, LLC	24-55507	730	\$952.70	OpCo General Unsecured Claim (Class 6A)	The Debtors believe that Claim No. 730 is duplicative of Claim No. 117 and reiterate the objection bases set forth above.
22	SAVO, JUDITH	LaVie Care Centers, LLC	24-55507	101	\$5,040.00	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for prepetition dietician services provided to the Debtors. The Claimant seeks treatment as a wage claim under Bankruptcy Code section 507(a)(4); however, the Claimant was a third-party service provider, not an employee on the payroll of the Debtors; thus, there is no basis for an allowed priority claim pursuant to Bankruptcy Code

Asserted Priority Claims							
#	Claimant	Debtor	Case Number	Claim Number	Priority Claim Amount	Reclassification	Reason for Reclassification
							section 507(a)(4) and Claim No. 101 should be reclassified as a general unsecured claim.
23	TOWN OF INDEPENDENCE	Grayson Facility Operations, LLC	24-55764	5083	\$583.25	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for “services rendered water and sewer.” Claimant seeks treatment of the penalties charged for void checks as a taxes or penalties priority claim under Bankruptcy Code section 507(a)(8), but the penalties charged do not relate to a tax obligation of the Debtors enumerated in Bankruptcy Code section 507(a)(8); thus, there is no basis for an allowed priority claim and Claim No. 5083 should be reclassified as a general unsecured claim.
24	WELSH, LINDA M.	Pennknoll Village Facility Operations, LLC	24-55631	442	\$8,750.00	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts \$8,750.00 for “services performed” and seeks priority treatment as a wage claim under Bankruptcy Code section 507(a)(4). However, Claimant was an independent contractor, specifically a medical director, not an employee on the payroll of the Debtors; thus, there is no basis for an allowed priority claim pursuant to Bankruptcy Code section 507(a)(4) and Claim No. 442 should be reclassified as a general unsecured claim. Moreover, based on the Debtors’ books and records, the Debtors believe that the reclassified unsecured claim should be revised to \$7,058.33 for services provided from February 1, 2024 to June 1, 2024.

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' ELEVENTH OMNIBUS OBJECTION
TO PROOFS OF CLAIM LISTED ON SCHEDULE 1**

Upon the *Debtors' Eleventh Omnibus Objection to Proofs of Claim Listed on Exhibit A*
[Docket No. [__]] (the "Objection")² filed on May 29, 2025 by the above-captioned debtors and

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.

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

debtors-in-possession (collectively, the “Debtors”) for entry of an order reclassifying the asserted priority claims identified on Schedule 1 attached hereto (collectively, the “Asserted Priority 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 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 Asserted Priority Claims are reclassified to non-priority, general unsecured claims as set forth on **Schedule 1** attached to this Order.

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 Asserted Priority Claims 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)

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- and -

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Email: ekeil@mwe.com

Counsel for the Debtors and Debtors-in-Possession

SCHEDULE 1

Asserted Priority Claims							
#	Claimant	Debtor	Case Number	Claim Number	Priority Claim Amount	Reclassification	Reason for Reclassification
1	A PERFECT CHOICE HOME CARE LLC	LaVie Care Centers, LLC	24-55507	5080	\$6,258.89	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for “services performed.” The Claimant seeks priority treatment as a wage claim under Bankruptcy Code section 507(a)(4), but the Claimant was a third-party service provider, not an employee on the payroll of the Debtors. Thus, there is no basis for an allowed priority claim and Claim No. 5080 should be reclassified as a general unsecured claim. Additionally, the claim was filed after the General Bar Date and therefore should be disallowed in its entirety, as reflected in the <i>Debtors’ Third Omnibus Objection to Late-Filed Claims</i> [Docket No. 947].
2	CAROLINA POWER SOLUTION CORPORATION	LaVie Care Centers, LLC	24-55507	1200	\$130.31	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for “services performed.” The Claimant seeks treatment of the taxes charged for the services performed as a taxes or penalties priority claim under Bankruptcy Code section 507(a)(8), but the Claimant was a third-party service provider, not a governmental unit asserting payment of taxes or penalties. Thus, there is no basis for an allowed priority claim and this portion of Claim No. 1200 should be reclassified as a general unsecured claim.
3	CIFUENTES, CRISTINA	LaVie Care Centers, LLC	24-55507	1159	\$564.84	OpCo General Unsecured Claim (Class 6A)	As set forth in the <i>Debtors’ Sixth Omnibus Objection to Unsubstantiated Claims</i> [Docket No. 971], the Claimant asserts an amount for “services performed” entitled to priority treatment for unpaid wages without explanation and does not provide any documentation to support the same. Without more, the Debtors do not have a basis for an allowed priority claim.

Asserted Priority Claims							
#	Claimant	Debtor	Case Number	Claim Number	Priority Claim Amount	Reclassification	Reason for Reclassification
4	ECONOMY PLUMBING SERVICES, INC.	Westwood HealthCare, LLC	24-55665	1833	\$138.43	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for “plumbing services performed.” The Claimant seeks treatment as a wage claim under Bankruptcy Code section 507(a)(4), but the Claimant was a third-party service provider, not an employee on the payroll of the Debtors. Thus, there is no basis for an allowed priority claim pursuant to Bankruptcy Code section 507(a)(4) and Claim No. 1833 should be reclassified as a general unsecured claim.
5	FOOTHILLS ELECTRIC SERVICE	LaVie Care Centers, LLC	24-55507	792	\$640.00	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for electrical repairs provided to the Debtors. The Claimant seeks treatment as a taxes or penalties priority claim under Bankruptcy Code section 507(a)(8), but the Claimant was a third-party service provider, not a governmental unit asserting a tax claim against the Debtors; thus, there is no basis for an allowed priority claim and Claim No. 792 should be reclassified as a general unsecured claim.
6	G.C.A.B. STAFFING LLC	Penn Village Facility Operations, LLC	24-55627	1871	\$28,353.72	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for staffing services provided to the Debtors. The Claimant seeks treatment as a priority wage claim under Bankruptcy Code section 507(a)(4), but the Claimant was a third-party staffing agency, not an employee on the payroll of the Debtors. Thus, there is no basis for an allowed priority claim pursuant to Bankruptcy Code section 507(a)(4) and Claim No. 1871 should be reclassified as a general unsecured claim.
7	GOOD HANDS TRANSPORTATION	LaVie Care Centers, LLC	24-55507	917	\$2,155.00	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for “services performed.” The Claimant seeks priority treatment as a wage claim under Bankruptcy Code section 507(a)(4), but the Claimant was a third-party service provider, not an employee on the payroll of the Debtors. Thus, there is no basis for an allowed priority claim and

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#	Claimant	Debtor	Case Number	Claim Number	Priority Claim Amount	Reclassification	Reason for Reclassification
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8	GRAIN COAST LLC	Hunter Woods HealthCare, LLC	24-55519	5075	\$54,656.40	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for “healthcare transportation services.” The Claimant seeks priority treatment as a wage claim under Bankruptcy Code section 507(a)(4), but the Claimant was a third-party service provider, not an employee on the payroll of the Debtors; thus, there is no basis for an allowed priority claim pursuant to Bankruptcy Code section 507(a)(4) and should be reclassified as a general unsecured claim. Additionally, the claim was filed after the General Bar Date and therefore should be disallowed in its entirety, as reflected in the <i>Debtors’ Third Omnibus Objection to Late-Filed Claims</i> [Docket No. 947].
9	ICE, ASHLEY	LaVie Care Centers, LLC	24-55507	191	\$3,350.00	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts \$3,350.00 for “401k” and seeks priority treatment pursuant to Bankruptcy Code section 507(a)(7) deposits toward purchase, lease, or rental of property without explanation. On its face, the Claim does not qualify for priority treatment pursuant to Bankruptcy Code section 507(a)(7); thus, there is no basis for an allowed priority claim.
10	LITTLE RIVER MEDICAL LLC	LaVie Care Centers, LLC	24-55507	426	\$12,000.00	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts \$12,000.00 for “four monthly medical director payments” and seeks priority treatment as a wage claim under Bankruptcy Code section 507(a)(4). However, the Claimant was an independent contractor, specifically a medical director, not an employee on the payroll of the Debtors; thus, there is no basis for an allowed priority claim pursuant to Bankruptcy Code section 507(a)(4) and Claim No. 426 should be reclassified as a general unsecured claim.
11	MARTONE, GIULIANA	Locust Grove Facility Operations, LLC	24-55602	771	\$860.00	OpCo General Unsecured Claim	The Claimant asserts an amount owed for prepetition cosmetology services provided to the

Asserted Priority Claims							
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16	NAGAMATSU, CHERYL	LaVie Care Centers, LLC	24-55507	161	\$495.00	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for prepetition cosmetology services provided to the Debtors. The Claimant seeks treatment as a wage claim under Bankruptcy Code section 507(a)(4); however, the Claimant was a third-party service provider, not an employee on the payroll of the Debtors. Thus, there is no basis for an allowed priority claim pursuant to Bankruptcy Code section 507(a)(4) and should be reclassified as a general unsecured claim.
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19	RLS HOMECHOICE AND STAFFING, INC.	LaVie Care Centers, LLC	24-55507	5164	\$42,574.31	OpCo General Unsecured Claim (Class 6A)	The Debtors believe that this is a late-filed claim that is duplicative of Claim No. 1835 and reiterate the objections set forth above.
20	ROSE, TRACY	LaVie Care Centers, LLC	24-55507	117	\$952.70	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for prepetition cosmetology services provided to the Debtors. The Claimant seeks treatment as a wage claim under Bankruptcy Code section 507(a)(4); however, the Claimant was a third-party service provider, not an employee on the payroll of the Debtors. Thus, there is no basis for an allowed priority claim pursuant to Bankruptcy Code section 507(a)(4) and Claim No. 117 should be reclassified as a general unsecured claim.
21	ROSE, TRACY	LaVie Care Centers, LLC	24-55507	730	\$952.70	OpCo General Unsecured Claim (Class 6A)	The Debtors believe that Claim No. 730 is duplicative of Claim No. 117 and reiterate the objection bases set forth above.
22	SAVO, JUDITH	LaVie Care Centers, LLC	24-55507	101	\$5,040.00	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for prepetition dietician services provided to the Debtors. The Claimant seeks treatment as a wage claim under Bankruptcy Code section 507(a)(4); however, the Claimant was a third-party service provider, not an employee on the payroll of the Debtors; thus, there is no basis for an allowed priority claim pursuant to Bankruptcy Code

Asserted Priority Claims							
#	Claimant	Debtor	Case Number	Claim Number	Priority Claim Amount	Reclassification	Reason for Reclassification
							section 507(a)(4) and Claim No. 101 should be reclassified as a general unsecured claim.
23	TOWN OF INDEPENDENCE	Grayson Facility Operations, LLC	24-55764	5083	\$583.25	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for “services rendered water and sewer.” Claimant seeks treatment of the penalties charged for void checks as a taxes or penalties priority claim under Bankruptcy Code section 507(a)(8), but the penalties charged do not relate to a tax obligation of the Debtors enumerated in Bankruptcy Code section 507(a)(8); thus, there is no basis for an allowed priority claim and Claim No. 5083 should be reclassified as a general unsecured claim.
24	WELSH, LINDA M.	Pennknoll Village Facility Operations, LLC	24-55631	442	\$8,750.00	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts \$8,750.00 for “services performed” and seeks priority treatment as a wage claim under Bankruptcy Code section 507(a)(4). However, Claimant was an independent contractor, specifically a medical director, not an employee on the payroll of the Debtors; thus, there is no basis for an allowed priority claim pursuant to Bankruptcy Code section 507(a)(4) and Claim No. 442 should be reclassified as a general unsecured claim. Moreover, based on the Debtors’ books and records, the Debtors believe that the reclassified unsecured claim should be revised to \$7,058.33 for services provided from February 1, 2024 to June 1, 2024.

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