

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)
)	
)	Related to Docket No. 1011

**NOTICE OF AMENDED EXHIBIT A WITH RESPECT TO DEBTORS'
ELEVENTH OMNIBUS OBJECTION TO PROOFS OF CLAIM LISTED ON EXHIBIT A**

PLEASE TAKE NOTICE that, on May 29, 2025, LaVie Care Centers, LLC and certain of its affiliates and subsidiaries (collectively, the “Debtors”) filed the *Debtors’ Eleventh Omnibus Objection to Proofs of Claim Listed on Exhibit A* [Docket No. 1011] (the “Eleventh Omnibus Objection”), which included a summary of asserted priority claims to which the Debtors were objecting as Exhibit A (the “Original Exhibit A”).

PLEASE TAKE FURTHER NOTICE that two additional claims to which the Debtors intended to object that were filed by one claimant were inadvertently left off the Original Exhibit A. Accordingly, the Debtors hereby file this amended version of the Original Exhibit A (the “Amended Exhibit A”), attached hereto as **Exhibit 1**, solely to reflect the addition of those two additional claims, noted in bold on the Amended Exhibit A.

PLEASE TAKE FURTHER NOTICE that a redline reflecting all changes between the Original Exhibit A and the Amended Exhibit A is attached hereto as **Exhibit 2**. As reflected in the certificate of service included herein, the Debtors will be serving a copy of this notice as well as the Eleventh Omnibus Objection on the additional claimant reflected on the Amended Exhibit A.

[Remainder of Page Intentionally Left Blank]

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.



24555072505300000000000002

Dated: May 30, 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

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- and -

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

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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 document 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 and the Eleventh Omnibus Objection 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.

Greater Hazleton Joint Sewer Authority
Attn: Attorney Joseph D Ustynoski
101 West Broad Street Suite 205
Hazleton, PA 18201
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Office of the United States Trustee
362 Richard Russell Federal Building
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Dated: May 30, 2025
Atlanta, Georgia

MCDERMOTT WILL & EMERY LLP

/s/ Daniel M. Simon

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Counsel to Debtors and Debtors-in-Possession

EXHIBIT 1

Amended Exhibit A

AMENDED 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	GREATER HAZLETON JOINT SEWER AUTHORITY	Manor at St. Luke Village Facility Operations, LLC	24-55685	958	\$6,414.74	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for “PA Statute Title 53 – Secured Municipal Lien” is entitled to priority under Bankruptcy Code section 507(a)(8), which provides priority treatment to claims for taxes or penalties owed to governmental units. As far as the Debtors are aware, the Claimant is not a governmental unit and is not owed outstanding taxes or any penalties related thereto, meaning that Claim No. 958 is not entitled to priority treatment and should be reclassified as a general unsecured claim. Additionally, based on a review of their books and records, the Debtors believe that only \$3,648.82 is outstanding and owed to this Claimant, meaning that Claim No. 958 should be revised accordingly to reflect the revised amount.
10	GREATER HAZLETON JOINT SEWER AUTHORITY	Pavilion at St. Luke Village Facility Operations, LLC	24-55623	963	\$6,414.74	OpCo General Unsecured Claim (Class 6A)	The Claimant asserts an amount owed for “PA Statute Title 53 – Secured Municipal Lien” is entitled to priority under Bankruptcy Code section 507(a)(8), which provides priority

Asserted Priority Claims							
#	Claimant	Debtor	Case Number	Claim Number	Priority Claim Amount	Reclassification	Reason for Reclassification
							treatment to claims for taxes or penalties owed to governmental units. As far as the Debtors are aware, the Claimant is not a governmental unit and is not owed outstanding taxes or any penalties related thereto, meaning that Claim No. 963 is not entitled to priority treatment and should be reclassified as a general unsecured claim.
11	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.
12	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.
13	MARTONE, GIULIANA	Locust Grove Facility Operations, LLC	24-55602	771	\$860.00	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. 771 should be reclassified as a general unsecured claim.

Asserted Priority Claims							
#	Claimant	Debtor	Case Number	Claim Number	Priority Claim Amount	Reclassification	Reason for Reclassification
14	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.
15	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].
16	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 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].

Asserted Priority Claims							
#	Claimant	Debtor	Case Number	Claim Number	Priority Claim Amount	Reclassification	Reason for Reclassification
17	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.
18	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.
19	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 Code section 507(a)(4) and Claim No. 112 should be reclassified as a general unsecured claim.
20	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

Asserted Priority Claims							
#	Claimant	Debtor	Case Number	Claim Number	Priority Claim Amount	Reclassification	Reason for Reclassification
							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.
21	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.
22	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.
23	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.
24	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 section 507(a)(4) and Claim No. 101 should be reclassified as a general unsecured claim.
25	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

Asserted Priority Claims							
#	Claimant	Debtor	Case Number	Claim Number	Priority Claim Amount	Reclassification	Reason for Reclassification
							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.
26	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 2

Redline of Amended Exhibit A

AMENDED EXHIBIT A

#	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.
4	ECONOMY	Westwood	24-55665	1833	\$138.43	OpCo General	The Claimant asserts an amount owed for

#	Claimant	Debtor	Case Number	Claim Number	Priority Claim Amount	Reclassification	Reason for Reclassification
	PLUMBING SERVICES, INC.	HealthCare, LLC				Unsecured Claim (Class 6A)	“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 Claim No. 917 should be reclassified

#	Claimant	Debtor	Case Number	Claim Number	Priority Claim Amount	Reclassification	Reason for Reclassification
8	GRAIN COAST LLC	Hunter Woods HealthCare, LLC	24-55519	5075	\$54,656.40	OpCo General Unsecured Claim (Class 6A)	to a general unsecured claim. 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].
<u>9</u>	<u>GREATER HAZLETON JOINT SEWER AUTHORITY</u>	<u>Manor at St. Luke Village Facility Operations, LLC</u>	<u>24-55685</u>	<u>958</u>	<u>\$6,414.74</u>	<u>OpCo General Unsecured Claim (Class 6A)</u>	<u>The Claimant asserts an amount owed for “PA Statute Title 53 – Secured Municipal Lien” is entitled to priority under Bankruptcy Code section 507(a)(8), which provides priority treatment to claims for taxes or penalties owed to governmental units. As far as the Debtors are aware, the Claimant is not a governmental unit and is not owed outstanding taxes or any penalties related thereto, meaning that Claim No. 958 is not entitled to priority treatment and should be reclassified as a general unsecured claim. Additionally, based on a review of their books and records, the Debtors believe that only \$3,648.82 is outstanding and owed to this Claimant, meaning that Claim No. 958 should be revised accordingly to reflect the revised amount.</u>
<u>10</u>	<u>GREATER HAZLETON JOINT SEWER</u>	<u>Pavilion at St. Luke Village Facility</u>	<u>24-55623</u>	<u>963</u>	<u>\$6,414.74</u>	<u>OpCo General Unsecured Claim (Class 6A)</u>	<u>The Claimant asserts an amount owed for “PA Statute Title 53 – Secured Municipal Lien” is entitled to priority under Bankruptcy</u>

#	Claimant	Debtor	Case Number	Claim Number	Priority Claim Amount	Reclassification	Reason for Reclassification
	<u>AUTHORITY</u>	<u>Operations, LLC</u>					<u>Code section 507(a)(8), which provides priority treatment to claims for taxes or penalties owed to governmental units. As far as the Debtors are aware, the Claimant is not a governmental unit and is not owed outstanding taxes or any penalties related thereto, meaning that Claim No. 963 is not entitled to priority treatment and should be reclassified as a general unsecured claim.</u>
9 <u>11</u>	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 <u>12</u>	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 <u>13</u>	MARTONE, GIULIANA	Locust Grove Facility Operations, LLC	24-55602	771	\$860.00	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. 771

#	Claimant	Debtor	Case Number	Claim Number	Priority Claim Amount	Reclassification	Reason for Reclassification
							should be reclassified as a general unsecured claim.
12 <u>14</u>	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 <u>15</u>	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 <u>16</u>	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 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

#	Claimant	Debtor	Case Number	Claim Number	Priority Claim Amount	Reclassification	Reason for Reclassification
							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 <u>17</u>	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 <u>18</u>	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 <u>19</u>	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 Code section 507(a)(4) and Claim No. 112 should be reclassified as a general unsecured claim.
18	RLS HOMECHOICE	LaVie Care	24-55507	1835	\$42,574.31	OpCo General	The Claimant asserts an amount owed for

#	Claimant	Debtor	Case Number	Claim Number	Priority Claim Amount	Reclassification	Reason for Reclassification
20 <u>20</u>	AND STAFFING, INC.	Centers, LLC				Unsecured Claim (Class 6A)	“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 <u>21</u>	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 <u>22</u>	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 <u>23</u>	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 <u>24</u>	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 section 507(a)(4) and Claim No. 101 should be reclassified as a general unsecured claim.
23 <u>2</u>	TOWN OF INDEPENDENCE	Grayson Facility Operations, LLC	24-55764	5083	\$583.25	OpCo General Unsecured Claim	The Claimant asserts an amount owed for “services rendered water and sewer.” Claimant

#	Claimant	Debtor	Case Number	Claim Number	Priority Claim Amount	Reclassification	Reason for Reclassification
<u>5</u>						(Class 6A)	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 <u>2</u> <u>6</u>	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.