

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

In re:

LAVIE CARE CENTERS, LLC, *et al.*,

Debtors,¹

541 OLD CANOE CREEK RD OPCO, LLC,

Plaintiff,

V.

RACHAEL SELLER-ALVAREZ,
as personal representative of the estate of
DOROTHY ROSLYN SELLER,

Defendant.

Chapter 11

Case No. 24-55507-PMB

(Jointly Administered)

Adversary Proc. No. 25-05077-PMB

NOTICE OF VOLUNTARY DISMISSAL

Plaintiff 541 Old Canoe Creek Rd Opco, LLC, by and through undersigned counsel and pursuant to Rule 7041 of the Federal Rules of Bankruptcy Procedure and Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure, hereby dismisses all claims alleged in the above-captioned

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, and pending the Effective Date of the Plan, they are being jointly administered for procedural purposes. 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, Georgia 30338.



24555072506160000000000006

adversary proceeding against Defendant Rachael Sheller-Alvarez, as personal representative of the estate of Dorothy Roslyn Sheller.

DATED: June 16, 2025

Respectfully submitted,

/s/ Andrew Zaron

Andrew D. Zaron, Esq.

Florida Bar No. 965790

LEÓN COSGROVE JIMÉNEZ, LLP

255 Alhambra Circle, 8th Floor

Miami, Florida 33134

Telephone: 305.740.1975

Email: azaron@leoncosgrove.com

Email: eperez@leoncosgrove.com

Admitted Pro Hac Vice

/s/Cameron M. McCord

Cameron M. McCord

Georgia Bar No. 143065

JONES & WALDEN LLC

699 Piedmont Avenue NE

Atlanta, Georgia 30308

Telephone: (404) 564-9300

Email: cmccord@joneswalden.com

*Counsel for 541 Old Canoe Creek Rd Opco,
LLC*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served by electronic mail on June 16, 2025, upon Max Eichenblatt, Esq., Brodsky Fotiu-Wojtowicz, PLLC, max@bfwlegal.com, counsel for Defendant Rachael Sheller-Alvarez, as personal representative of the estate of Dorothy Roslyn Sheller.

Respectfully submitted,

/s/ Andrew Zaron

Andrew D. Zaron, Esq.

Florida Bar No. 965790

LEÓN COSGROVE JIMÉNEZ, LLP

255 Alhambra Circle, 8th Floor

Miami, Florida 33134

Telephone: 305.740.1975

Email: azaron@leoncosgrove.com

Email: eperez@leoncosgrove.com