

individual claimants (collectively, the “Movants”). In further support of this Statement, the GUC Trustee respectfully states as follows:

BACKGROUND

1. On June 2, 2024, and June 3, 2024 (together, the “Petition Dates”), the Debtors each filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code, initiating the above-captioned chapter 11 cases (the “Chapter 11 Cases”). The Debtors operated their business as debtors-in-possession in accordance with Sections 1107 and 1108 of the Bankruptcy Code.

2. On June 13, 2024, the Office of the United States Trustee organized the Committee and appointed its members.

A. The Motions and Stay Relief Oppositions

3. As more fully set forth in the Stay Oppositions, Movants filed several motions seeking to lift the automatic stay to liquidate personal injury tort claims pending against various Debtors in state court.

4. The Debtors filed the Debtors’ Objection to the Motions on September 30, 2024. The Official Committee of Unsecured Creditors filed its Joinder thereafter. At the time the Stay Relief Oppositions were filed, the Plan (defined below) had not been confirmed by the Court.

5. The Motions are scheduled for the hearing on June 25, 2025, at 9:30 a.m. (ET).

B. The Plan

6. 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*

Liquidate Personal Injury Tort Claim in Pending Litigation, (2) Pursue Recovery to the Extent of Insurance Coverage, and (3) Grant Related Relief [D.I. 358] (the “Sifrit Motion”), and (vi) the *Motion for Relief from Automatic Stay to Proceed Against Insurance with Waiver of 30-Day Requirements of 11 U.S.C. Section 362(e)* [D.I. 425] (the “Garrett Motion”). Since the filing of the Stay Relief Oppositions, some of the Motions have been resolved, adjourned, or withdrawn. The GUC Trustee files this Statement to respond to the outstanding or pending Motions.

Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization [D.I. 735] (the “Confirmation Order”), confirming the *Debtors’ Modified Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* [D.I. 730] (the “Plan”). In connection with the Plan, the Debtors filed several supplements to the Plan [D.I. 593, 630, 678, 731, 885, 997] (collectively, the “Plan Supplement”).

7. The Plan contains the following injunction (the “Plan Injunction”) with respect to commencing or pursuing pending actions against the Debtors:

Except as otherwise expressly provided in the Plan, or for obligations issued or required to be paid pursuant to the Plan or the Confirmation Order, **all Entities who have held, hold, or may hold claims or interests that have been released, discharged, or are subject to exculpation are permanently enjoined, from and after the Effective Date, from taking any of the following actions against, as applicable, the Debtors, the Reorganized Debtors, the Exculpated Parties, or the Released Parties: (1) commencing or continuing in any manner any action or other proceeding of any kind on account of or in connection with or with respect to any such claims or interests; (2) enforcing, attaching, collecting, or recovering by any manner or means any judgment, award, decree, or order against such Entities on account of or in connection with or with respect to any such claims or interests; (3) creating, perfecting, or enforcing any encumbrance of any kind against such Entities or the property or the estates of such Entities on account of or in connection with or with respect to any such claims or interests; (4) asserting any right of setoff, subrogation, or recoupment of any kind against any obligation due from such Entities or against the property of such Entities on account of or in connection with or with respect to any such claims or interests unless such holder has Filed a motion requesting the right to perform such setoff on or before the Effective Date, and notwithstanding an indication of a claim or interest or otherwise that such holder asserts, has, or intends to preserve any right of setoff pursuant to applicable law or otherwise; and (5) commencing or continuing in any manner any action or other proceeding of any kind on account of or in connection with or with respect to any such claims or interests released or settled pursuant to the Plan.**

Plan, Art. X § F (emphasis added). The Plan Injunction therefore precludes certain actions from proceeding against the Debtors and other parties outside of the bankruptcy to facilitate the Plan's implementation.

8. In addition, the Plan contains comprehensive procedures (all such procedures, the "Claims Procedures") for reconciling claims, including disputed and/or unliquidated claims filed by personal injury claimants. *See* Plan, Art. VIII § J; *See* D.I. 731 (Plan Supplement, Ex. I). The Claims Procedures include the Unliquidated Claim Procedures, which were heavily negotiated and allow holders of unliquidated personal injury claims like Movants the opportunity to participate in a streamlined mediation process to liquidate their claims on a consensual basis and receive a quicker distribution on account of such claims if allowed. *See* D.I. 731 (Plan Supplement, Ex. I)

9. On June 1, 2025, the Effective Date under the Plan occurred. *See* D.I. 1016.

10. On the Effective Date (as defined in the Plan) of the Plan, the GUC Trust was established to administer certain assets and reconcile general unsecured claims for the benefit of holders of allowed general unsecured claims. The GUC Trustee was appointed to oversee the GUC Trust.

11. The GUC Trustee, as administrator of the GUC Trust, possesses the right to object or otherwise respond to the Motions. It files this Statement to join in the Stay Relief Oppositions and supplement the arguments therein now that the Plan has gone effective.

STATEMENT

12. As an initial matter, the Motions are moot because they seek relief from the automatic stay under 11 U.S.C. § 362, which is no longer in effect and has been replaced by the Plan Injunction. In addition, the Claims Procedures, including the Unliquidated Claim Procedures, are now enforceable and govern the resolution of general unsecured claims asserted against the

Debtors. The Unliquidated Claim Procedures were heavily negotiated and specifically designed to address and streamline a fair and equitable resolution of unliquidated personal injury claims, such as those asserted by the Movants. Granting the Motions would undermine the streamlined and uniform procedures that exist in the Plan to provide fair, equitable and efficient recoveries on account of unliquidated personal injury claims. If Movants wish to pursue claims in state court solely against available insurance proceeds, the Unliquidated Claim Procedures provide a path for them to do so, subject to certain protections for similarly-situated creditors. Movants should be required to comply with the terms of the Plan, including the Unliquidated Claim Procedures.

13. In addition, the GUC Trustee has not completed its review of the Debtors' available insurance coverage on account of general unsecured claims. The GUC Trustee is aware that many of the Debtors' insurance policies are "reimbursement-only" policies, thereby effectively eliminating any actual insurance coverage. Even if certain of the Debtors' insurance policies provide coverage, the Debtors' insurance policies have certain limits and conditions that must be considered before any individual creditor seeks a recovery through a particular policy. Otherwise, one creditor could exhaust a particular policy at the expense of other creditors who may have claims against the same policy.

14. For these reasons—and for the reasons already noted in the Stay Relief Oppositions—the Motions should be denied. The Unliquidated Claim Procedures were approved as part of the Plan to ensure that the GUC Trustee has an opportunity to reconcile and resolve unliquidated personal injury claims in the most efficient manner possible while protecting the rights and interests of all similarly-situated creditors. Movants should not be permitted to bypass these procedures.

CONCLUSION

WHEREFORE, the GUC Trustee respectfully requests that the Court sustain the Stay Relief Oppositions and deny the Motions.

Dated: June 23, 2025

TROUTMAN PEPPER LOCKE LLP

/s/ Pierce E. Rigney

Pierce E. Rigney (GA ID No. 656946)
600 Peachtree Street, NE, Suite 3000
Atlanta, GA 30308
Telephone: 404.885.3901
Email: pierce.rigney@troutman.com

-and-

Francis J. Lawall (admitted *pro hac vice*)
3000 Two Logan Square
Eighteenth and Arch Streets
Philadelphia, PA 19103-2799
Telephone: 215.981.4481
Email: francis.lawall@troutman.com

-and-

Mathew R. Brooks (GA ID #378018)
Deborah Kovsky-Apap (admitted *pro hac vice*)
875 Third Avenue
New York, NY 10022
Telephone: 212.704.6000
Email: matthew.brooks@troutman.com
deborah.kovsky@troutman.com

Counsel for the GUC Trustee

CERTIFICATE OF SERVICE

I hereby certify that on June 23, 2025, all ECF participants registered in this case were served electronically with the foregoing through the Court's ECF system at their respective email addresses registered with the Court.

I further certify that on June 23, 2025, I caused a true and correct copy of the Motion to be served by first class mail to the entities on the service list attached here to as

Exhibit I.

/s/ Pierce E. Rigney

Pierce E. Rigney (GA ID No. 656946)

Troutman Pepper Locke LLP

600 Peachtree Street, NE, Suite 3000

Atlanta, GA 30308

Telephone: (404) 885-3901

Email: pierce.rigney@troutman.com

Counsel to the GUC Trustee

Exhibit 1

Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip	Country	Email
Counsel to American Federation of State, County & Municipal Employees, AFL-CIO (AFSCME)	American Federation of State, County & Municipal Employees, AFL-CIO	Matthew Stark Blumin, Office of General Counsel	1101 17th Street NW, Suite 900			Washington	DC	20036		MBlumin@afscme.org
Creditors Committee Member / Top 30 Creditor	Amidon Nurse Staffing, LLC	Eli Schick	1732 Kingsley Avenue, Suite 1			Orange Park	FL	32073		eschick@amidonns.com
Creditors Committee Member / Top 30 Creditor	Amidon Nurse Staffing, LLC		PO Box 436			Malverne	NY	11565		eschick@amidonns.com
Counsel for Claimants, Interested Parties, and Healthcare Negligence Settlement Recovery Corp.	Anthony and Partners, LLC	John Anthony	100 S. Ashley Drive, Suite 1600			Tampa	FL	33602		cfosdick@anthonyandpartners.com; eservice@anthonyandpartners.com; euzonwanne@anthonyandpartners.com
Counsel to Jacksonville Nursing Home, Ltd.	Baker Donelson Bearman Caldwell & Berkowitz, PC	Kathleen G Furr	3414 Peachtree Road, N.E., Suite 1500	Monarch Plaza		Atlanta	GA	30326		Kfurr@BakerDonelson.com
Counsel to Floridean SNF Operations, LLC, Baya Pointe SNF Operations, LLC, and Osprey SNF Operations, LLC	Berman Fink Van Horn, P.C.	Lydia M. Hilton, William J. Piercy	3475 Piedmont Road, NE	Suite 1640		Atlanta	GA	30305		lhilton@bvfvlaw.com; wpiercy@bvfvlaw.com; bpiercy@bvfvlaw.com
Counsel to Empirian Health, LLC	Burr & Forman LLP	Derek F Meek	420 North 20th Street, Suite 3400			Birmingham	AL	35203		dmeek@burr.com
Counsel to Healthcare Services Group, Inc.	Burr & Forman LLP	Graham H Stieglitz	1075 Peachtree Street, N.E., Suite 3000			Atlanta	GA	30309		gstieglitz@burr.com
Creditors Committee Member	CDB Services USA, LLC	Sidney Robert Bradley	3707 W. Jetton Avenue			Tampa	FL	33629		Sidney.Bradley@wecarestaffservices.com
Centers for Medicare & Medicaid Services	Centers for Medicare & Medicaid Services		7500 Security Blvd			Baltimore	MD	21244		
Counsel to Office Business Solutions, LLC	Chinnery Evans & Nail, P.C.	Elizabeth S. Lynch	800 NE Vanderbilt Lane			Lee's Summit	MO	64064		blynch@chinnery.com
Counsel to the Duval County Tax Collector	City of Jacksonville, Office of General Counsel	Laura Boeckman, Assistant General Counsel	117 West Duval Street, Suite 480			Jacksonville	FL	32202		lboeckman@coj.net
Co-counsel to Davies Claims Solutions, LLC	Cohen Pollock Merlin Turner, P.C.	Bruce Z. Walker	3350 Riverwood Parkway, Suite 1600			Atlanta	GA	30339		bwalker@cpmtlaw.com
Counsel to Lawrenceville SNF Operations LLC, Fork Union SNF Operations LLC, Westover Hills SNF Operations LLC, Williamsburg SNF Operations LLC, Staunton SNF Operations LLC, Winchester SNF Operations LLC, Chelsea Operator LLC, Belmont Bay Operator, LLC, Southampton Operator, LLC, and Alexandria Operator, LLC	Copeland, Stair, Valz & Lovell LLP	Mark D. Lefkow, D. Gary Lovell, Jr.	P.O. Box 56887			Atlanta	GA	30343-0887		mlefkow@csvl.law; glovell@csvl.law
Creditors Committee Member	Corrado Burdieri, as Personal Representative For the Estate of Theresa Mary Burdieri	c/o Jon M. Herskowitz, Esq.	Baron & Herskowitz	9100 S. Dadeland Blvd., Suite 1704		Miami	FL	33156		jon@bhfloridalaw.com; janthony@anthonyandpartners.com
Counsel to the Debtors' Proposed DIP Lenders (TIX 33433 LLC)	DLA Piper LLP (US)	Attn James Muenker	1900 N Pearl St, Suite 2200			Dallas	TX	75201		james.muenker@us.dlapiper.com
Counsel to the Debtors' Proposed DIP Lenders (TIX 33433 LLC)	DLA Piper LLP (US)	Attn Kira Mineroff	1251 Avenue of the Americas			New York	NY	10020		kira.mineroff@dlapiper.com
Counsel to the Debtors' Proposed DIP Lenders (TIX 33433 LLC)	DLA Piper LLP (US)	Joseph A. Roselius	444 W. Lake St., Suite 900			Chicago	IL	60606-0089		joseph.roselius@us.dlapiper.com

Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip	Country	Email
Counsel to the Debtors' Proposed DIP Lenders (TIX 33433 LLC)	DLA Piper LLP (US)	Emily Marshall	1201 West Peachtree Street NW			Atlanta	GA	30309		emily.marshall@us.dlapiper.com
Counsel to the Chubb Companies	Duane Morris LLP	Nicolette J. Zulli, Christopher D. Kanne	1075 Peachtree Street NE, Suite 1700			Atlanta	GA	30309-3929		njzulli@duanemorris.com; cdkanne@duanemorris.com
Counsel to the Chubb Companies	Duane Morris LLP	Wendy M. Simkulak, Jessica Kenney Bonteque	30 South 17th Street			Philadelphia	PA	19103-4196		wmsimkulak@duanemorris.com; jbonteque@duanemorris.com
Counsel to Elderberry Nursing Home Landlords	Elderberry	Attn C. Lynch Christian, III	1000 Church Street, Third Floor			Lynchburg	VA	24504		clchristian@1000churchstreet.com
Counsel to the Prepetition Omega Secured Parties, Omega Landlords, and Proposed DIP Lenders (OHI DIP Lender, LLC & OHI Mezz Lender, LLC)	Ferguson Braswell Fraser Kubasta PC	Attn Leighton Aiken	2500 Dallas Parkway, Suite 600			Plano	TX	75093		laiken@fbfk.law
State Attorney General	Florida Attorney General	Attn Bankruptcy Department	PL-01 The Capitol			Tallahassee	FL	32399-1050		citizenservices@myfloridalegal.com; oag.civil.eserve@myfloridalegal.com
State Attorney General	Georgia Attorney General	Attorney General Chris Carr	40 Capitol Square, SW			Atlanta	GA	30334		Agcarr@law.ga.gov
Georgia Department of Revenue	Georgia Department of Revenue	Attn Bankruptcy Dept	State Revenue Commissioner	1800 Century Blvd NE, Suite 15300		Atlanta	GA	30345		
Counsel to Welltower NNN Group, LLC	Gibson, Dunn & Crutcher LLP	Jeffrey C. Krause, Michael G. Farag	333 South Grand Avenue			Los Angeles	CA	90071		jkrause@gibsondunn.com; mfarag@gibsondunn.com
Counsel to the Prepetition Omega Secured Parties, Omega Landlords, and Proposed DIP Lenders (OHI DIP Lender, LLC & OHI Mezz Lender, LLC)	Goodwin Proctor LLP	Attn Robert J Lemons, Liza L. Burton	The New York Times Building	620 Eighth Avenue		New York	NY	10018		RLemons@goodwinlaw.com; lburton@goodwinlaw.com
Counsel to Harts Harbor Health Landlords	Harts Harbor	Baker Donelson Bearman Caldwell & Berkowitz, PC	Attn Sandra Adams	200 East Broward Blvd, Suite 2000		Fort Lauderdale	FL	33301		sadams@bakerdonelson.com
Counsel to New Port Richey Opco, LLC, Pensacola Opco, LLC, Brandon Health Opco, LLC, Port Charlotte OpCo, LLC, Bayonet Opco, LLC, Sarasota Opco, LLC, Melbourne Opco LLC, Kissimmee Opco, LLC, West Altamonte Opco, LLC, and Franco SNF Operations LLC	Hawkins Parnell & Young, LLP	Carl H. Anderson, Jr.	303 Peachtree Street, NE, Suite 4000			Atlanta	GA	30308-3243		canderson@hpylaw.com
Creditors Committee Member / Top 30 Creditor	Healthcare Services Group	Patrick J Orr, Pete Nenstiel	3220 Tilman Drive, Suite No 300			Bensalem	PA	18201		porr@hcsgrcorp.com; pnienstiel@hcsgrcorp.com
Internal Revenue Service	Internal Revenue Service	Centralized Insolvency Operation	2970 Market St			Philadelphia	PA	19104		Mimi.M.Wong@irsounsel.treas.gov
Internal Revenue Service	Internal Revenue Service	Centralized Insolvency Operation	PO Box 7346			Philadelphia	PA	19101-7346		Mimi.M.Wong@irsounsel.treas.gov
Counsel to 541 Old Canoe Creek Rd Opco LLC	Jones & Walden LLC	Cameron M. McCord	699 Piedmont Avenue, NE			Atlanta	GA	30308		CMcCord@joneswalden.com
LLC and CAREmasters Healthcare Services LLC	Jones & Walden LLC	Thomas T. McClendon	699 Piedmont Avenue, NE			Atlanta	GA	30308		tmcclendon@joneswalden.com
Claims and Noticing Agent	KCC dba Verita	Sydney Reitzel	222 N Pacific Coast Highway, Ste 300			El Segundo	CA	90245		LVCCinfo@kccllc.com

Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip	Country	Email
Counsel to Powerback Rehabilitation, LLC d/b/a Powerback Rehabilitation and Respiratory Health Services, LLC d/b/a Powerback Respiratory	Keck Legal, LLC	Benjamin R. Keck	2801 Buford Hwy NE, Suite 115			Atlanta	GA	30329		bkeck@kecklegal.com
Counsel to LEAF Capital Funding, LLC	Kilpatrick Townsend & Stockton LLP	Paul M. Rosenblatt	1100 Peachtree St NE, Suite 2800			Atlanta	GA	30309		prosenblatt@ktslaw.com; ecfnotices@ktslaw.com
Counsel for Claimants and Interested Parties	Lamberth, Cifelli, Ellis & Nason, PA	G. Frank Nason, IV	6000 Lake Forrest Drive, NW Suite 435			Atlanta	GA	30328		fnason@lcnlaw.com
Debtors	LaVie Care Centers LLC	M Benjamin Jones	c/o Ankura Consulting Group, LLC	485 Lexington Avenue, 10th Floor		New York	NY	10017		
Counsel for the Debtors and Debtors-in-Possession	McDermott Will & Emery, LLP	Daniel M Simon	1180 Peachtree Street NE, Suite 3350			Atlanta	GA	30309		dmsimon@mwe.com
Counsel for the Debtors and Debtors-in-Possession	McDermott Will & Emery, LLP	Emily C Keil	444 West Lake Street, Suite 4000			Chicago	IL	60606		ekeil@mwe.com
Counsel for the Debtors and Debtors-in-Possession	McDermott Will & Emery, LLP	Jake Jumbeck, Catherine Lee	444 West Lake Street, Suite 4000			Chicago	IL	60606		jjumbeck@mwe.com; clee@mwe.com
Counsel to Michigan Department of Treasury	Michigan Department of Treasury	Moe Freedman, Assistant Attorney General	3030 W. Grand Blvd. Ste. 10-200	Cadillac Place Building		Detroit	MI	48202		FreedmanM1@michigan.gov
State Attorney General	Mississippi Attorney General	Attn Bankruptcy Department	Walter Sillers Building	550 High St Ste 1200		Jackson	MS	39201		
Counsel to CREA Brandon-C LLC and Brandon Health OpCo, LLC	Nelson Mullins Riley & Scarborough, LLP	Shane G. Ramsey	1222 Demonbreun St., Suite 1700			Nashville	TN	37203		shane.ramsey@nelsonmullins.com
State Attorney General	North Carolina Attorney General	Attn Bankruptcy Department	9001 Mail Service Center			Raleigh	NC	27699-9001		ncago@ncdoj.gov
Office of the United States Trustee for the Northern District of Georgia	Office of the United States Trustee	Jonathan S. Adams, R. Jeneane Treace	362 Richard B Russell Bldg	75 Ted Turner Drive, SW		Atlanta	GA	30303		USTP.Region21@usdoj.gov; Jonathan.S.Adams@usdoj.gov; jeneane.treace@usdoj.gov
Creditors Committee Member / Top 30 Creditor	Omnicare Inc	Foley & Lardner, LLP	Geoff Goodman	321 North Clark Street, Suite 300		Chicago	IL	60654		GGoodman@foley.com
Creditors Committee Member / Top 30 Creditor	Omnicare Inc	Greg Day	6825 W. Galveston Street, #3			Chandler	AZ	85226		Gregory.Day@CVSHealth.com
Counsel to Carolina Rehabilitation & Surgical Associates, P.A.	Pamela P. Keenan		PO Box 19766			Raleigh	NC	27619-9766		pkeenan@kirschlaw.com
Counsel to the Debtors' Prepetition ABL Lender (MidCap Funding IV Trust)	Parker, Hudson, Rainer & Dobbs LLP	Matthew M. Weiss, Anna K. MacFarlane	303 Peachtree Street NE, Suite 3600			Atlanta	GA	30308		mweiss@phrd.com; amacfarlane@phrd.com
State Attorney General	Pennsylvania Attorney General	Attn Bankruptcy Department	16th Floor, Strawberry Square			Harrisburg	PA	17120		info@attorneygeneral.gov
Counsel to CDB Services USA LLC d/b/a weCare Staffing Services	Pierson Ferdinand LLP	Susan V Warner	333 SE 2nd Avenue, Suite 2000			Miami	FL	33131		susan.warner@pierferd.com
Creditors Committee Member / Counsel to CDB Services USA LLC d/b/a weCare Staffing Services	Pierson Ferdinand LLP	Thomas R Walker	260 Peachtree Street NW, Suite 2200			Atlanta	GA	30303		thomas.walker@pierferd.com
Counsel to Welltower NNN Group, LLC	Polsinelli, PC	David E Gordon, Caryn E Wang, Ashley D Champion	1201 West Peachtree, Street NW, Suite 1100			Atlanta	GA	30309		dgordon@polsinelli.com; cewang@polsinelli.com; achampion@polsinelli.com

Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip	Country	Email
Counsel to the Debtors' Prepetition ABL Lender (MidCap Funding IV Trust)	Proskauer Rose LLP	Attn Charles A Dale	One International Place			Boston	MA	02110		cdale@proskauer.com
Counsel to the Debtors' Prepetition ABL Lender (MidCap Funding IV Trust)	Proskauer Rose LLP	Dylan Marker	Eleven Times Square			New York	NY	10036-8299		dmarker@proskauer.com
Counsel to United Steelworkers and AFSCME	Quinn, Connor, Weaver, Davies & Rouco, LLP	Glen M. Connor, Richard P. Rouco	Two North Twentieth Street Suite 930			Birmingham	AL	35203		gconnor@qcwdr.com; rrouco@qcwdr.com
Counsel to United Steelworkers and AFSCME	Quinn, Connor, Weaver, Davies & Rouco, LLP	Nicolas M. Stanojevich	4100 Perimeter Park South			Atlanta	GA	30341		nstanojevich@qcwdr.com
Counsel to Gale Healthcare Solutions, LLC	Richelo Law Group, LLC	Thomas Richelo	8230 Grogans Ferry Road			Atlanta	GA	30350		trichelo@richelolaw.com
GUC Trustee	Ryniker Consultants, LLC	Attn: Brian Ryniker	1178 Broadway, 3rd Floor #1505			New York	NY	10001		brian@rkcllc
Counsel to the Prepetition Omega Secured Parties, Omega Landlords, and Proposed DIP Lenders (OHI DIP Lender, LLC & OHI Mezz Lender, LLC)	Scroggins & Williamson & Ray, P.C.	Attn Matthew W Levin	4401 Northside Parkway, Suite 230			Atlanta	GA	30327		mlevin@swlawfirm.com
Creditors Committee Member / Top 30 Creditor	Shiftmed, LLC	Continental PLLC	c/o Jesus M. Suarez	255 Alhambra Circle, Suite 640		Coral Gables	FL	33134		Jsuarez@continentalpllc.com
Creditors Committee Member / Top 30 Creditor	Shiftmed, LLC	Karen Gaster, General Counsel	7925 Jones Branch Drive, Suite 1100			McClean	VA	22102		legal@shiftmed.com; karen.gaster@shiftmed.com
Patient Care Ombudsman for Virginia Facilities	State Long-Term Care Ombudsman	Joani Latimer	8004 Franklin Farms Drive			Richmond	VA	23229		Joani.Latimer@dars.virginia.gov
Patient Care Ombudsman for Pennsylvania Facilities	State Long-Term Care Ombudsman	Margaret Barajas	555 Walnut Street, 5th Floor			Harrisburg	PA	17101		Mbarajas@pa.gov
Patient Care Ombudsman for Mississippi Facilities	State Long-Term Care Ombudsman	Shelby Walker	200 S. Lamar Street	Mississippi Department of Human Services		Jackson	MS	39201		shelby.walker@mdhs.ms.gov
Patient Care Ombudsman for Florida Facilities	State Long-Term Care Ombudsman	Terri Cantrell	4040 Esplande Way			Tallahassee	FL	32399		cantrellt@elderaffairs.org
Patient Care Ombudsman for North Carolina Facilities	State Long-Term Care Ombudsman	Victor Orija	2101 Mail Service Center			Raleigh	NC	27699		Victor.Orija@dhhs.nc.gov
Counsel to Creditor, Wanda Halloway, as the Executrix of the Estate of JoEllen Sommer	Steinfeld & Steinfeld, PC	Shayna M. Steinfeld	11B Lenox Pointe, NE			Atlanta	GA	30324		shayna@steinfeldlaw.com
Creditors Committee Member / Counsel to Healthcare Services Group, Inc.	Stevens & Lee	Robert Lapowsky, Elizabeth Rogers	620 Freedom Business Center, Suite 200			King of Prussia	PA	19406		Robert.lapowsky@stevenslee.com; Elizabeth.rogers@stevenslee.com
Creditors Committee Member	Theodore Horrobin	Gordon & Partners	c/o Scott Fischer	4114 Northlake Boulevard		Palm Beach Gardens	FL	33410		SFischer@fortheinjured.com
Counsel to the Official Committee of Unsecured Creditors	Troutman Pepper Locke LLP	Deborah Kovsky-Apap	875 Third Avenue			New York	NY	10022		deborah.kovsky@troutman.com
Counsel to the Official Committee of Unsecured Creditors	Troutman Pepper Locke LLP	Francis J Lawall	3000 Two Logan Square	Eighteenth and Arch Streets		Philadelphia	PA	19103-2799		francis.lawall@troutman.com
Counsel to the Official Committee of Unsecured Creditors	Troutman Pepper Locke LLP	Joanna J Cline	1313 N. Market Street	Hercules Plaza, Suite 5100	PO Box 1709	Wilmington	DE	19899-1709		joanna.cline@troutman.com
Counsel to the Official Committee of Unsecured Creditors	Troutman Pepper Locke LLP	Matthew R Brooks, Pierce E. Rigney	600 Peachtree Street, NE, Suite 3000			Atlanta	GA	30308		matthew.brooks@troutman.com; pierce.rigney@troutman.com

Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip	Country	Email
Creditors Committee Member / Top 30 Creditor	Twin Med LLC	David Klarner	11333 Greenstone Avenue			Santa Fe Springs	CA	90670		dklarner@twinmed.com
Creditors Committee Member / Top 30 Creditor	Twin Med LLC		PO Box 847340			Los Angeles	CA	90084-7340		payments@twinmed.com
Counsel to the United States of America	U.S. Department of Justice, Civil Division	Louisa A. Soulard	1100 L Street, N.W., Room 7526			Washington	DC	20005		louisa.soulard@usdoj.gov
Counsel to the United States of America	U.S. Department of Justice, Civil Division	Louisa A. Soulard	P.O. Box 875	Ben Franklin Station		Washington	DC	20044-0875		louisa.soulard@usdoj.gov
Counsel to the United States of America	U.S. Department of Justice, Tax Division	Hana Bilicki, Chase A. Burrell, Jeremy A. Rill	P.O. Box 14198			Washington	DC	20044		Hana.Bilicki@usdoj.gov; Chase.Burrell@usdoj.gov; Jeremy.A.Rill@usdoj.gov
Securities & Exchange Commission	U.S. Securities & Exchange Commission	Office of Reorganization	950 East Paces Ferry Road NE, Suite 900			Atlanta	GA	30326-1382		
Counsel to Lakeview SNF Operations LLC, Palm Springs SNF Operations LLC, Franco SNF Operations LLC, Lake Parker SNF Operations LLC, and Vero Beach Operations, LLC	UB Greensfelder LLP	Jennifer Snyder Heis	312 Walnut Street, Suite 1400			Cincinnati	OH	45202-4029		jheis@ubglaw.com
United States Attorney for the Northern District of Georgia	United States Attorney Northern District of Georgia		600 Richard B Russell Bldg	75 Ted Turner Drive, SW		Atlanta	GA	30303-3309		
Counsel to the Internal Revenue Service	United States Attorney's Office	Vivieon Kelly Jones, Assistant US Attorney	75 Ted Turner Drive SW, Suite 600			Atlanta	GA	30303		vivieon.jones@usdoj.gov
Co-counsel to Davies Claims Solutions, LLC	Updike, Kelly & Spellacy, P.C.	Kevin J. McEleney	225 Asylum Street, 20th Floor			Hartford	CT	06103		kmceleney@uks.com
Counsel to the Debtors' Prepetition ABL Lender (MidCap Funding IV Trust)	Vedder Price PC	Attn Kathryn L Stevens	222 North LaSalle Street, Suite 2600			Chicago	IL	60601		kstevens@vedderprice.com
State Attorney General	Virginia Attorney General	Attn Bankruptcy Department	202 North Ninth St			Richmond	VA	23219		mailoag@oag.state.va.us
Counsel to Superior Medical Staffing and Gale Healthcare Solutions, LLC	Walters Levine & DeGrave	Heather A. DeGrave	601 Bayshore Boulevard, Suite 720			Tampa	FL	33606		hdegrave@walterslevine.com; jduncan@walterslevine.com