

**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)

) **Obj. Deadline: Aug. 12, 2025 at 4:00 p.m. (ET)**

) **Hr'g Date: Aug. 29, 2025 at 10:00 a.m. (ET)**
(Only if objections are filed)

**NOTICE OF FILING OF FINAL APPLICATION OF CHAPMAN AND
CUTLER LLP, SPECIAL COUNSEL TO THE BOARD OF DIRECTORS, FOR
ALLOWANCE AND PAYMENT OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES**

PLEASE TAKE NOTICE that, on July 22, 2025, Chapman and Cutler LLP (the “Applicant” or “Chapman”) filed its *Final Application of Chapman and Cutler LLP, Special Counsel to the Board of Directors, for Allowance and Payment of Compensation and Reimbursement of Expenses* (the “Application”). Pursuant to the Third Amended and Restated General Order No. 24-2018, the Court may consider this matter without further notice or a hearing if no party in interest files a response or objection **within twenty-one (21) days from the date of service of this notice. If you object to the relief requested in this pleading, you must timely file your objection with the Bankruptcy Clerk at Clerk, U.S. Bankruptcy Court, Suite 1340, 75 Ted Turner Drive, SW, Atlanta, Georgia 30303, and serve a copy on the Applicant: Larry G. Halperin (halperin@chapman.com), Chapman and Cutler LLP, 1270 Avenue of the Americas, New York, New York** and any other appropriate persons by the objection deadline. The response or objection must explain your position and be actually received by the Bankruptcy Clerk within the required time.

A hearing on the Application has been scheduled for **August 29, 2025 at 10:00 a.m. (prevailing Eastern Time) in Courtroom 1202, United States Courthouse, 75 Ted Turner Drive, SW, Atlanta, Georgia 30303**, which may be attended in person or via the Court’s Virtual Hearing Room. You may join the Virtual Hearing Room through the “Dial-in and Virtual Bankruptcy Hearing Information” link at the top of the homepage of the Court’s website, www.ganb.uscourts.gov, or the Virtual Hearing Room link on Judge Baisier’s webpage, which can be found at <https://www.ganb.uscourts.gov/content/honorable-paul-m-baisier>. Please also review

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.



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the “Hearing Information” tab on Judge Baisier’s webpage for further information about the hearing. You should be prepared to appear at the hearing 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 the judge’s webpage.

If an objection or response is timely filed and served, the hearing will proceed as scheduled. **If you do not file a response or objection within the time permitted, the Court may grant the relief requested in the Application without further notice and without holding the scheduled hearing** provided that an order approving the relief requested is entered at least one business day prior to the scheduled hearing. If no objection is timely filed, but no order is entered granting the relief requested at least one business day prior to the scheduled hearing, the hearing will be held as scheduled.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

Dated: July 22, 2025
New York, New York

CHAPMAN AND CUTLER LLP

/s/ Larry G. Halperin
Larry G. Halperin
CHAPMAN AND CUTLER LLP
1270 Avenue of the Americas
New York, NY 10020
(212) 655-2517
halperin@chapman.com

**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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)	Obj. Deadline: Aug. 12, 2025 at 4:00 p.m.
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)	Hr'g Date: Aug. 29, 2025 at 10:00 a.m. (ET)
		(Only if objections are filed)

**SUMMARY OF FINAL APPLICATION OF CHAPMAN AND CUTLER LLP, SPECIAL
COUNSEL TO BOARD OF DIRECTORS, FOR ALLOWANCE AND PAYMENT OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES**

Name of Applicant:	CHAPMAN AND CUTLER LLP
Authorized to provide professional services to:	Board of Directors
Date of retention:	June 25, 2024, effective as of June 28, 2024
Period for which compensation and reimbursement is sought:	May 1, 2024 through June 30, 2025
Amount of final compensation sought as actual, reasonable, and necessary:	\$582,996.00²
Amount of final expense reimbursement sought as actual, reasonable and necessary:	\$4,584.89

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 To the extent such estimated amounts are in excess of actual amounts incurred in connection with these tasks, Chapman will reduce the amounts payable accordingly, and to the extent actual amounts incurred exceed this estimated amount, Chapman will waive any such excess amounts.

Amount of compensation paid to date as actual, reasonable, and necessary: **\$582,996.00**

Amount of expense reimbursement paid to date as actual, reasonable, and necessary: **\$4,584.89**

This is a: **Final Fee Application**

Prior Monthly Fee Statements:³

Document	Date Served	Period Covered	Requested Fees/Expenses	Objections Served	Date Paid
	5/31/24	Pre-Bankruptcy Proceedings	\$29,251.5	None	6/3/2024
	5/31/24	Pre-Bankruptcy Proceedings	\$18,111.50	None	6/3/24
	6/6/24	Pre-Bankruptcy Proceedings	\$3,537.50	None	6/6/24
	6/6/24	Pre-Bankruptcy Proceedings	\$7,295.50	None	6/6/24
First Monthly Fee Statement	9/5/24	6/2/24 – 6/30/24	\$100,560.50/ \$0.00	None	9/24/24
Second Monthly Fee Statement	9/13/24	7/1/24 – 7/31/24	\$43,745.00/ \$0.00	None	10/9/24
Third Monthly Fee Statement	9/25/24	8/1/24 – 8/31/24	\$75,923.00/ \$0.00	None	10/21/24
Fourth Monthly Fee Statement	10/15/24	9/1/24 – 9/30/24	\$141,759.00/ \$1,233.10	None	11/19/24
Fifth Monthly Fee Statement	11/21/24	10/1/24 – 10/31/24	\$42,612.00/ \$0.00	None	12/18/24
Sixth Monthly Fee Statement	1/06/25	11/1/24 – 11/30/24	\$89,185.50/ \$3,351.79	None	1/30/25
Seventh Monthly Fee Statement	2/19/25	12/1/24 – 12/31/24	\$7,075.00/ \$0.00	None	3/10/25
Eighth Monthly Fee Statement	2/1/25	1/1/25 – 1/31/25	\$8,109.00/ \$0.00	None	4/15/25
	4/14/25		\$8,745.00	None	4/15/25

	5/8/25		\$4,134.00	None	5/9/25
	5/8/25		\$1,680.00	None	5/9/25
	6/9/25		\$1,272.00	None	6/18/25
		TOTAL	\$582,996.00/ \$4,584.89		

³ As discussed herein, the Complex Case Procedures provide that a retained professional may serve a monthly fee statement to certain professional fee notice parties at the end of each month for which compensation is sought, containing a list of individuals and their respective titles who provided services during the statement period, their respective billing rates, the aggregate hours spent by each individual, contemporaneously maintained time entries for each individual in increments of tenths of an hour, and a reasonably detailed breakdown of disbursements incurred. *See* Complex Case Procedures, at J(2)(a)-(b). Provided that there are no objections to the monthly fee statement served within ten days of service, a debtor is authorized to pay such retained professional hundred percent (100%) of the fees and expenses requested in such monthly fee statement. *See id.* at J(2)(d). Chapman performed and provided legal work and consultation to a LaVie affiliate, LV Operations, prior to the Debtors' Application for Entry of Chapman as Counsel in June 2024. Additionally, Chapman performed other legal services that were not provided in a Monthly Fee Statement for the months of March2025-June 2025.

**LAVIE CARE CENTERS, LLC, ET AL.
SPECIAL COUNSEL TO BOARD OF DIRECTORS
SUMMARY OF BILLING BY PROFESSIONAL FOR APPLICATION PERIOD
FROM May 1, 2024 THROUGH June 30, 2025**

Name of Professional Person	Date of Bar Admission	Position with the Applicant and Practice Area	Hourly Billing Rate ¹	Total Billed Hours	Total Compensation
Larry G. Halperin	1988	Partner; Special Situations and Restructuring	2024-\$1,415	234.00	\$331,110.00
			2025-\$1,590	14	\$22,260.00
David T. Audley	1985	Partner; Banking and Financial Services and Litigation	2024-\$1,415	37.2	\$52,638.00
Joseph P. Lombardo	2000	Partner; Litigation	2024-\$1,245	140.00	\$174,300.00
			2025-\$1,400	1.2	\$1,680.00
TOTAL				426.4	\$581,988.00 ²

-
- 1 Attorney rates represent the 2024 and 2025 standard hourly rate of each Chapman attorney who rendered legal services.
 - 2 The total hours (426.4) and total compensation amount (\$581,988.00) does not include Chapman's de minimus or administrative work completed by legal professionals or paralegals.

**LAVIE CARE CENTERS, LLC, ET AL.
SPECIAL COUNSEL TO BOARD OF DIRECTORS
EXPENSE SUMMARY FOR APPLICATION PERIOD FROM
JUNE 2, 2024 THROUGH JANUARY 31, 2025**

Expense Category	Service Provider (if applicable)	Total Expenses
Travel	Various	\$4,073.05
Business Meals	Various	\$511.84
TOTAL		\$4,584.89

Debtors' service address is 1040 Crown Pointe Parkway, Suite 600, Atlanta, GA 30338.

JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the Northern District of Georgia (the "Court") has jurisdiction to consider this Application pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b). Venue of the Chapter 11 Cases and this Application in this District is proper under 28 U.S.C. §§ 1408 and 1409. The legal predicates for the relief requested herein are Bankruptcy Code sections 330 and 331, Bankruptcy Rule 2016, and Complex Case Procedure J.

BACKGROUND

I. The Chapter 11 Cases

2. 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").

3. 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].

4. On June 25, 2024, the Debtors applied [Docket No. 138] (the "Chapman Retention Application") to the Court for an order authorizing the Debtors to retain and employ Chapman as its special counsel, effective as of June 2, 2024. On June 28, 2024, the Court entered an order [Docket No. 188] authorizing such retention, which became effective on July 19, 2024.

5. 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 Plan. The Confirmation Order provides that final fee applications must be filed with the Court no later than 45 days after the Effective Date and served on the Reorganized Debtors, the GUC Trustee, and the U.S. Trustee. *See* Confirmation Order, ¶ 39. Objections, if any, to final fee applications must be filed and served on the Reorganized Debtors, the GUC Trustee, the requesting professional, and the U.S. Trustee no later than 21 days from the date on which the final fee application is served and filed. *See id.*

6. On June 2, 2025, the Debtors filed and served the *Notice of (I) Entry of Order Confirming Debtors’ Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization and (II) Occurrence of the Effective Date* [Docket No. 1016], apprising parties-in-interest that the Plan became effective on June 1, 2025 (the “Effective Date”).

II. The Complex Case Procedures

7. The Complex Case Procedures provide that a retained professional may serve a monthly fee statement (the “Monthly Statement”) at the end of each month for which compensation is sought on (a) counsel for the debtor; (b) counsel for the prepetition secured lender; (c) counsel for any post-petition lender; (d) counsel to all official committees; (e) the U.S. Trustee; and (f) any other party the Court designates (collectively, the “Professional Fee Notice Parties”). *See* Complex Case Procedure J(2)(a). Each Monthly Statement shall contain a list of individuals and their respective titles who provided services during the statement period, their respective billing rates, the aggregate hours spent by each individual, contemporaneously maintained time entries for each individual in increments of tenths of an hour, and a reasonably detailed breakdown of disbursements incurred. *See id.* at J(2)(b). In the event a Professional Fee Notice Party has an objection to the compensation or reimbursement sought in a particular Monthly Statement, it shall,

within ten (10) days after service of the Monthly Statement, serve upon the professional whose statement is objected to and the other Professional Fee Notice Parties a written “Notice of Objection to Fee Statement,” setting forth the nature of the objection and the amount of fees or expenses at issue. *See id.* at J(2)(c).

8. Provided that there are no objections to the monthly fee statement served within ten days after service of a monthly fee statement, the debtors are authorized to pay such retained professional hundred percent (100%) of the fees and one-hundred percent (100%) of the expenses requested in such monthly fee statement. *See id.* at J(2)(d). If counsel for the debtors receives an objection to such monthly fee statement, the debtors shall withhold payment of that portion of the monthly fee statement to which the objection is directed and shall, after the expiration of the ten day period, be authorized to promptly pay the remainder of the fees and expenses set forth in the monthly statement. *See id.* at J(2)(e). If an objection is filed to the monthly fee statement and the parties reach a consensual resolution, the objecting party (or the debtors, with the consent of the objecting party) shall serve written notice on the Professional Fee Notice Parties that the objection is withdrawn, shall describe the terms of the resolution, and the debtors shall be authorized to pay that portion of the monthly statement at issue that is no longer subject to an objection. *See id.* at J(2)(f). Any objection that is not resolved by the parties shall be preserved and presented to the Court at the next interim or final fee application hearing. *See id.* at J(2)(g).

III. Chapman’s Monthly Statements

9. Pursuant to the Complex Case Procedures, Chapman served eight Monthly Fee Statements, copies of which are attached hereto as **Exhibit A-1** through **Exhibit A-8**¹, on the Professional Fee Notice Parties for which no objections were received by Chapman and amounts were subsequently paid by the Debtors, as summarized below:

¹ A comprehensive fee statement and invoice is attached hereto as **Exhibit A-9**, which includes all Chapman invoices for *all* work performed by Chapman, and dates of payments by LaVie.

Document	Date Served	Period Covered	Requested Fees/Expenses	Objections Served	Date Paid
	5/31/24	Pre-Bankruptcy Proceedings	\$29,251.5	None	6/3/24
	5/31/24	Pre-Bankruptcy Proceedings	\$18,111.50	None	6/3/24
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Fifth Monthly Fee Statement	11/21/24	10/1/24 – 10/31/24	\$42,612.00/ \$0.00	None	12/18/24
Sixth Monthly Fee Statement	1/06/25	11/1/24 – 11/30/24	\$89,185.50/ \$3,351.79	None	1/30/25
Seventh Monthly Fee Statement	2/19/25	12/1/24 – 12/31/24	\$7,075.00/ \$0.00	None	3/10/25
Eighth Monthly Fee Statement	2/1/25	1/1/25 – 1/31/25	\$8,109.00/ \$0.00	None	4/15/25
	4/14/25		\$8,745.00	None	4/15/25
	5/8/25		\$4,134.00	None	5/9/25
	5/8/25		\$1,680.00	None	5/9/25
	6/9/25		\$1,272.00	None	6/18/25

		TOTAL	\$582,996.00/ \$4,584.89		
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10. To date, as reflected above, Chapman has received \$587,580 from the Board of Directors in connection with work completed from May 1, 2024 through June 30, 2025, consisting of (a) eight Monthly Fee Statements for the period from June 2, 2024 through January 31, 2025, including \$508,969 in fees and \$4,584.89 in expenses, (b) \$151,098.5 in fees for Chapman's legal work and consultation to a LaVie affiliate, LV Operations, prior to the Debtors' Application for Entry of Chapman as Counsel in June 2024, and (c) \$15,831 in legal fees for work performed from February 2025 through June 2025, that were not previously included in the eight Monthly Fee Statements.

RELIEF REQUESTED

11. By this Application, Chapman seeks final approval and allowance of compensation in the amount of \$587,580 for professional services rendered, and reimbursement of actual and necessary expenses incurred during the Application Period.

12. As set forth above, Chapman has already received the entirety of the \$587,580 in fees and expenses from the Debtors in connection work completed from May 1, 2024 through June 30, 2025, consisting of (a) eight Monthly Fee Statements for the period from June 2, 2024 through January 31, 2025, including \$508,969 in fees and \$4,584.89 in expenses, (b) \$151,098.5 in fees for Chapman's legal work and consultation to a LaVie affiliate, LV Operations, prior to the Debtors' Application for Entry of Chapman as Counsel in June 2024, and (c) \$15,831 in legal fees for work performed from February 2025 through June 2025, that were not previously included in the eight Monthly Fee Statements.

13. Therefore, as set forth below, subject to Court approval, Chapman requests final payment of **\$00.00**.

Category	Amount
<i>Fees</i>	
Fees Requested	\$587,580.00

<i>Minus</i> Fees Paid to Date	\$587,580.00
<i>Plus</i> Estimated Fee Application Fees	\$00.00
Fees Outstanding	\$00.00
Outstanding Fees to be Paid by Debtors	\$00.00
Total Outstanding Amount to be Paid by Debtors	\$00.00

STATEMENT FROM CHAPMAN

14. Chapman has made reasonable efforts to comply with the *Appendix B Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed Under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases*, effective as of November 1, 2013 (the “U.S. Trustee Guidelines”). With respect to section C.5 of the U.S. Trustee Guidelines, Chapman respectfully states as follows with respect to the Application Period:

Question	Yes or No	Additional Explanation
Did you agree to any variations from, or alternatives to, your standard or customary billing rates, fees or terms for services pertaining this engagement that were provided during the application period? If so, please explain.	No	Chapman increased its billing rates as of January 1, 2025 and applied 2025 rates for January 2025 of the Application Period.
If the fees sought in this fee application as compared to the fees budgeted for the time period covered by this fee application are higher by 10% or more, did you discuss the reasons for the variation with the client?	N/A	N/A
Have any of the professionals included in this fee application varied their hourly rate based on the geographic location of the bankruptcy case?	No	N/A
Does the fee application include time or fees related to reviewing or revising time records or preparing, reviewing, or revising invoices?	No	N/A

Does the fee application include time or fees for reviewing time records to redact any privileged or other confidential information? If so, please quantify by hours and fees.	No	
<p>If the fee application includes any rate increases since retention in these cases:</p> <p>i. Did your client review and approve those rate increases in advance?</p> <p>Did your client agree when retaining the law firm to accept all future rate increases? If not, did you inform your client that they need not agree to modified rates or terms in order to have you continue the representation, consistent with ABA Formal Ethics Opinion 11-458?</p>	No	N/A

DESCRIPTION OF SERVICES PROVIDED

15. Prior to any bankruptcy proceedings, Chapman devoted time to the representation of James D. Decker, his appointment as independent director, including the negotiation of the terms of his engagement letter, the organizational structure of the company, and the advising as to bankruptcy proceedings. During the Application Period, Chapman attorneys served as conflict and special counsel in order to conduct internal investigations. Chapman conducted those investigations into potential claims against the estate and directors and officers, advised Mr. Decker regarding this investigation, and represented Mr. Decker at his deposition.

16. Chapman also provided legal services to Mr. Decker and the Board of Directors in connection with all matters relating to the Debtors, including but not limited to, development and approval of the plan of reorganization, creditor negotiations, meeting with constituents, discussions with the Mediator, and court hearings.

17. In connection with the foregoing services, Chapman incurred fees during the Application Period in the amount of \$587,580.00. Chapman's work in the majority of the foregoing matter categories is summarized in the eight Monthly Fee Statements and Invoices attached hereto as **Exhibit A-1** through **Exhibit A-9** include detailed itemizations, by project category, of all services performed by Chapman with respect to the Chapter 11 Cases during the Application Period. This detailed itemization complies with Complex Case Procedure J in that each time entry contains (a) a separate time allotment, a description of the type of activity, and the subject matter of the activity; (b) all time is billed in increments of one-tenth of an hour; and (c) attorneys who rendered services related to each category are identified, along with the number of hours for each individual and the total compensation sought for each category.

BASIS FOR RELIEF & APPLICABLE AUTHORITY

18. This Application is submitted under the standards set forth in *Grant v. George Schumann Tire & Battery Company*, 908 F.2d 874 (11th Cir. 1990); *Norman v. Housing Authority of the City of Montgomery*, 836 F.2d 1292 (11th Cir. 1988); and *Johnson v. Georgia Highway*

Express, Inc., 488 F.2d 714 (5th Cir. 1974). The twelve factors listed in *Johnson* and quoted in *Grant*, affecting the fee application award included, inter alia (a) the time and labor required (b) the novelty and difficulty of the questions presented; (c) the skills requisite to performing the legal services properly; (d) the preclusion of other employment by the attorney or trustee due to acceptance of this case; (e) the customary fee charged by such attorney or trustee; (f) whether the fee is fixed or contingent; (g) time limitations imposed by the client or other circumstances; (h) the amount involved and the results obtained; (i) the experience, reputation and ability of the attorney or trustee; (j) the “undesirability” of the case; (k) the nature and length of the professional relationship with the client; and (l) awards in similar cases.

19. In accordance with the factors enumerated above, and given the facts and circumstances of the Chapter 11 Cases, Chapman submits that the amount requested is fair and reasonable in light of the awards in similar cases, and that Chapman involvement in these Chapter 11 Cases has deprived it of the ability to earn fees from other clients which would have been charged for service and the same or higher rate for which the Board of Directors and Debtors’ estates are being charged at this time.

20. Chapman’s fees during the Application Period are also reasonable under the prevailing legal standard and should be allowed. The amount of these fees is not unusual given the complexity, size and the amount of work required to represent the Board of Directors’ interests in obtaining approval of a consensual plan in the Chapter 11 Cases. Chapman’s fees are commensurate with fees that other attorneys of comparable experience and expertise have charged and been awarded in similar chapter 11 cases. Accordingly, Chapman’s fees are reasonable pursuant to Bankruptcy Code section 330.

21. Bankruptcy Code section 330(a)(1)(B) permits reimbursement for actual and necessary expenses. *See* 11 U.S.C. § 330(a)(1)(B). Chapman’s expenses incurred on behalf of the Board of Directors during the Application Period are set forth in this Application and constitute only those necessary expenses that were incurred for the benefit of the Board of Directors.

Chapman has properly requested reimbursement of only actual, necessary and appropriate legal expenses.

22. Attached hereto as Exhibit B is the Declaration of Larry G. Halperin in support of the Application, confirming the facts set out in the Application and the exhibits attached hereto.

RESERVATION OF RIGHTS

23. Although every effort has been made to include all fees and expenses incurred in the Application Period, some fees and expenses might not be included in this Application due to delays caused by accounting and processing during the Application Period. Chapman reserves the right to make further application to the Court for allowance of such fees and expenses not included herein.

NOTICE

24. Chapman has provided notice of this Application to (a) the U.S. Trustee; (b) counsel to the GUC Trustee; (c) counsel to the Reorganized Debtors; (d) counsel to the Professional Fee Notice Parties; and (e) all other counsel of record.

NO PRIOR REQUEST

25. No prior request for the relief sought in the Application has been made to this or any other court.

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CONCLUSION

WHEREFORE, Chapman respectfully requests (i) allowance on a final basis of (a) compensation in the amount of \$582,996.00 for professional services rendered to the Board of Directors and Debtors during the Application Period; and (b) reimbursement of \$4,584.49 for actual and necessary expenses incurred during the Application Period; (ii) and such other or further relief as this Court deems proper.

Dated: July 22, 2025
New York, New York

CHAPMAN AND CUTLER LLP

/s/ Larry G. Halperin
Larry G. Halperin
CHAPMAN AND CUTLER LLP
1270 Avenue of the Americas
New York, NY 10020
(212) 655-2517
halperin@chapman.com

CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2025, the foregoing *Final Fee Application of Chapman and Cutler LLP, Special Counsel to the Board of Directors, for Allowance and Payment of Compensation and Reimbursement of Expenses* was filed using the Bankruptcy Court's CM/ECF system, which automatically sends a notice of this document and an accompanying link to this document to all parties who have appeared in this case under the Bankruptcy Court's ECF program, and was also served on the Professional Notice Parties, counsel to the Reorganized Debtors, counsel to the GUC Trustee, and counsel to the U.S. Trustee.

Dated: July 22, 2025
New York, New York

CHAPMAN AND CUTLER LLP

/s/ **Larry G. Halperin**
Larry G. Halperin
CHAPMAN AND CUTLER LLP
1270 Avenue of the Americas
New York, NY 10020
(212) 655-2517
halperin@chapman.com

EXHIBIT A-1

First Monthly Fee Statement

June 2, 2024 – June 30, 2024

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

In re:)	
)	Chapter 11
)	
LAVIE CARE CENTERS, LLC, <i>et al.</i> ,)	Case No. 24-55507 (PMB)
)	
Debtors. ¹)	(Jointly Administered)
)	
)	Obj. Deadline: September 16, 2024
)	

**SUMMARY OF FIRST MONTHLY FEE STATEMENT OF
CHAPMAN AND CUTLER LLP, SPECIAL COUNSEL TO BOARD
OF DIRECTORS, FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD
FROM JUNE 2, 2024 THROUGH JUNE 30, 2024**

Name of Applicant:	CHAPMAN AND CUTLER LLP
Authorized to provide professional services to:	Board of Directors
Date of retention:	May 1, 2024, effective as of June 2, 2024
Period for which compensation and reimbursement is sought:	June 2, 2024 through June 30, 2024
Amount of compensation sought as actual, reasonable and necessary:	\$100,560.50
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$0.00
This is a:	First Monthly Fee Statement

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.

EXHIBIT A-2

Second Monthly Fee Statement
July 1, 2024 – July 31, 2024

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

In re:

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

Debtors.¹

)
) Chapter 11
)

) Case No. 24-55507 (PMB)
)

) (Jointly Administered)
)

) **Obj. Deadline: September 23,**
) **2024**
)

**SUMMARY OF SECOND MONTHLY FEE STATEMENT OF
CHAPMAN AND CUTLER LLP, SPECIAL COUNSEL TO BOARD
OF DIRECTORS, FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM
JULY 1, 2024 THROUGH JULY 31, 2024**

Name of Applicant:	CHAPMAN AND CUTLER LLP
Authorized to provide professional services to:	Board of Directors
Date of retention:	May 1, 2024, effective as of June 2, 2024
Period for which compensation and reimbursement is sought:	July 1, 2024 through July 31, 2024
Amount of compensation sought as actual, reasonable and necessary:	\$43,745.00
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$0.00
This is a:	Second Monthly Fee Statement

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.

EXHIBIT A-3

Third Monthly Fee Statement
August 1, 2024 – August 31, 2024

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

In re:)	
)	Chapter 11
)	
LAVIE CARE CENTERS, LLC, <i>et al.</i> ,)	Case No. 24-55507 (PMB)
)	
Debtors. ¹)	(Jointly Administered)
)	
)	Obj. Deadline: October 7, 2024
)	

**SUMMARY OF THIRD MONTHLY FEE STATEMENT OF
CHAPMAN AND CUTLER LLP, SPECIAL COUNSEL TO BOARD
OF DIRECTORS, FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM
AUGUST 1, 2024 THROUGH AUGUST 31, 2024**

Name of Applicant:	CHAPMAN AND CUTLER LLP
Authorized to provide professional services to:	Board of Directors
Date of retention:	May 1, 2024, effective as of June 2, 2024
Period for which compensation and reimbursement is sought:	August 1, 2024 through August 31, 2024
Amount of compensation sought as actual, reasonable and necessary:	\$75,923.00
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$0.00
This is a:	Third Monthly Fee Statement

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.

EXHIBIT A-4

Fourth Monthly Fee Statement
September 1, 2024 – September 30, 2024

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

In re:)	
)	Chapter 11
)	
LAVIE CARE CENTERS, LLC, <i>et al.</i> ,)	Case No. 24-55507 (PMB)
)	
Debtors. ¹)	(Jointly Administered)
)	
)	Obj. Deadline: October 25, 2024
)	

**SUMMARY OF FOURTH MONTHLY FEE STATEMENT OF
CHAPMAN AND CUTLER LLP, SPECIAL COUNSEL TO BOARD
OF DIRECTORS, FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD
SEPTEMBER 1, 2024 THROUGH SEPTEMBER 30, 2024**

Name of Applicant:	CHAPMAN AND CUTLER LLP
Authorized to provide professional services to:	Board of Directors
Date of retention:	June 25, 2024, effective as of June 2, 2024
Period for which compensation and reimbursement is sought:	September 1, 2024 through September 30, 2024
Amount of compensation sought as actual, reasonable and necessary:	\$141,759.00
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$1,233.10
This is a:	Fourth Monthly Fee Statement

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.

EXHIBIT A-5

Fifth Monthly Fee Statement
October 1, 2024 – October 31, 2024

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

In re:)	
)	Chapter 11
)	
LAVIE CARE CENTERS, LLC, <i>et al.</i> ,)	Case No. 24-55507 (PMB)
)	
Debtors. ¹)	(Jointly Administered)
)	
)	Obj. Deadline: December 2, 2024
)	

**SUMMARY OF FIFTH MONTHLY FEE STATEMENT OF
CHAPMAN AND CUTLER LLP, SPECIAL COUNSEL TO BOARD
OF DIRECTORS, FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM
OCTOBER 1, 2024 THROUGH OCTOBER 31, 2024**

Name of Applicant:	CHAPMAN AND CUTLER LLP
Authorized to provide professional services to:	Board of Directors
Date of retention:	May 1, 2024, effective as of June 2, 2024
Period for which compensation and reimbursement is sought:	October 1, 2024 through October 31, 2024
Amount of compensation sought as actual, reasonable and necessary:	\$42,612.00
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$0.00
This is a:	Fifth Monthly Fee Statement

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.

EXHIBIT A-6

Sixth Monthly Fee Statement
November 1, 2024 – November 30, 2024

**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: January 16, 2025
)	

**SUMMARY OF SIXTH MONTHLY FEE STATEMENT OF
CHAPMAN AND CUTLER LLP, SPECIAL COUNSEL TO BOARD
OF DIRECTORS, FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM
NOVEMBER 1, 2024 THROUGH NOVEMBER 30, 2024**

Name of Applicant:	CHAPMAN AND CUTLER LLP
Authorized to provide professional services to:	Board of Directors
Date of retention:	May 1, 2024, effective as of June 2, 2024
Period for which compensation and reimbursement is sought:	November 1, 2024 through November 30, 2024
Amount of compensation sought as actual, reasonable and necessary:	\$89,185.50
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$3,351.79
This is a:	Sixth Monthly Fee Statement

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.

EXHIBIT A-7

Seventh Monthly Fee Statement
December 1, 2024 – December 31, 2024

**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)
)

) **Obj. Deadline: March 3, 2025**
)
)

**SUMMARY OF SEVENTH MONTHLY FEE STATEMENT OF
CHAPMAN AND CUTLER LLP, SPECIAL COUNSEL TO BOARD
OF DIRECTORS, FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM
DECEMBER 1, 2024 THROUGH DECEMBER 31, 2024**

Name of Applicant:

CHAPMAN AND CUTLER LLP

Authorized to provide professional
services to:

Board of Directors

Date of retention:

May 1, 2024, effective as of June 2, 2024

Period for which compensation
and reimbursement is sought:

December 1, 2024 through December 31, 2024

Amount of compensation sought as
actual, reasonable and necessary:

\$7,075.00

Amount of expense reimbursement
sought as actual, reasonable and necessary:

\$0.00

This is a:

Seventh Monthly Fee Statement

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.

EXHIBIT A-8

Eighth Monthly Fee Statement
January 1, 2025 – January 31, 2025

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: April 11, 2025
)	

**SUMMARY OF EIGHTH MONTHLY FEE STATEMENT OF
CHAPMAN AND CUTLER LLP, SPECIAL COUNSEL TO BOARD
OF DIRECTORS, FOR ALLOWANCE OF COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR THE PERIOD FROM
JANUARY 1, 2025 THROUGH JANUARY 31, 2025**

Name of Applicant:	CHAPMAN AND CUTLER LLP
Authorized to provide professional services to:	Board of Directors
Date of retention:	May 1, 2024, effective as of June 2, 2024
Period for which compensation and reimbursement is sought:	January 1, 2025 through January 31, 2025
Amount of compensation sought as actual, reasonable and necessary:	\$8,109.00
Amount of expense reimbursement sought as actual, reasonable and necessary:	\$0.00
This is a:	Eighth Monthly Fee Statement

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.

EXHIBIT A-9

Comprehensive Invoices and Payments Received
May 1, 2024 – June 30, 2025

EXHIBIT B

Declaration of Larry G. Halperin

**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: Aug. 12, 2025 at 4:00 p.m.
)	(ET)
)	Hr'g Date: Aug. 29, 2025 at 10:00 a.m. (ET)
		<i>(Only if objections are filed)</i>

**DECLARATION OF LARRY G. HALPERIN IN SUPPORT OF THE FINAL
APPLICATION OF CHAPMAN AND CUTLER LLP, SPECIAL COUNSEL TO THE
BOARD OF DIRECTORS, FOR ALLOWANCE AND PAYMENT OF
COMPENSATION AND REIMBURSEMENT OF EXPENSES**

I, Larry G. Halperin, declare under penalty of perjury that the statements contained in the foregoing Application as to fees and expenses sought for Chapman are true and correct and that no agreement exists, directly or indirectly, for division of compensation to be awarded with any creditor, the Debtors, or any other attorney or any other person whatsoever.

Dated: July 22, 2025
New York, New York

CHAPMAN AND CUTLER LLP

/s/ Larry G. Halperin
Larry G. Halperin
CHAPMAN AND CUTLER LLP
1270 Avenue of the Americas
New York, NY 10020
(212) 655-2517
halperin@chapman.com

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.