

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

	)	
In re	)	Chapter 11
	)	
LAVIE CARE CENTERS, LLC, <i>et al.</i> <sup>1</sup>	)	Case No. 24-55507-PMB
	)	
Debtors.	)	(Jointly Administered)
	)	
	)	<b><u>Objection Deadline:</u></b>
	)	February 16, 2026, at 4:00 p.m. (ET)
	)	
	)	<b><u>Hearing Date:</u></b>
	)	February 23, 2026, at 10:00 a.m. (ET)
	)	

**NOTICE OF HEARING AND DEADLINE TO RESPOND TO THE GUC TRUSTEE’S  
THIRD OMNIBUS OBJECTION TO (I) DUPLICATIVE CLAIMS, (II)  
UNSUBSTANTIATED CLAIMS, AND (III) WORKERS’ COMPENSATION CLAIMS  
AS SET FORTH ON EXHIBITS A-1 THROUGH A-3**

**THIS IS AN OBJECTION TO YOUR CLAIM. SUBSTANTIVE RIGHTS MAY BE AFFECTED BY THIS OBJECTION AND BY ANY FURTHER OBJECTION THAT MAY BE FILED. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON EXHIBITS A-1 THROUGH A-3 ATTACHED HERETO TO LEARN THE GROUNDS FOR THE OBJECTION PERTAINING TO THEIR CLAIMS AND THE RELIEF BEING SOUGHT BY THE GUC TRUSTEE.**

**PLEASE BE AWARE THAT THE GUC TRUSTEE IS ASKING THE COURT TO DISALLOW AND EXPUNGE OR MODIFY THE CLAIM(S) THAT YOU FILED IN THESE CHAPTER 11 CASES. TO THE EXTENT YOU DISAGREE WITH THE RELIEF SOUGHT IN THE OBJECTION, YOU SHOULD IMMEDIATELY CONTACT THE GUC TRUSTEE TO RESOLVE THE DISPUTE. IF YOU DO NOT REACH AN AGREEMENT, YOU MUST FILE A RESPONSE TO THIS OBJECTION AND SEND A COPY OF YOUR RESPONSE TO THE GUC TRUSTEE AND OTHER PARTIES INDICATED HEREIN BY FEBRUARY 16, 2026, AT 4:00 P.M. (PREVAILING EASTERN TIME). YOUR RESPONSE MUST STATE WHY THE OBJECTION IS NOT VALID. IF YOU DO NOT**

<sup>1</sup> 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.kccllc.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.



**TIMELY FILE A RESPONSE YOUR CLAIM MAY BE DISALLOWED, EXPUNGED, OR MODIFIED WITHOUT FURTHER NOTICE OR HEARING.**

**A HEARING (THE “HEARING”) ON THE OBJECTION AND ANY RESPONSES FILED THERETO WILL TAKE PLACE ON FEBRUARY 23, 2026, AT 10:00 A.M. (PREVAILING EASTERN TIME) BEFORE THE HONORABLE PAUL M. BAISIER AT THE UNITED STATES BANKRUPTCY COURT FOR THE NORTHERN DISTRICT OF GEORGIA, 75 TED TURNER DR. SW, COURTROOM 1202, ATLANTA, GEORGIA 30303, WHICH MAY BE ATTENDED IN PERSON OR VIRTUALLY VIA THE COURT’S VIRTUAL HEARING ROOM. YOU MAY JOIN THE VIRTUAL HEARING ROOM THROUGH THE “DIAL-IN AND VIRTUAL BANKRUPTCY HEARING INFORMATION” LINK AT THE TOP OF THE HOMEPAGE OF THE COURT’S WEBSITE, WWW.GANB.USCOURTS.GOV, OR THE VIRTUAL HEARING ROOM LINK ON JUDGE BAISIER’S WEBPAGE, WHICH CAN BE FOUND AT [HTTPS://WWW.GANB.USCOURTS.GOV/CONTENT/HONORABLE-PAUL-MBAISIER](https://www.ganb.uscourts.gov/content/honorable-paul-mbaisier). PLEASE ALSO REVIEW THE “HEARING INFORMATION” TAB ON JUDGE BAISIER’S WEBPAGE FOR FURTHER INFORMATION ABOUT THE HEARINGS. YOU SHOULD BE PREPARED TO APPEAR AT THE HEARINGS VIA VIDEO, BUT YOU MAY LEAVE YOUR CAMERA IN THE OFF POSITION UNTIL THE COURT INSTRUCTS OTHERWISE. UNREPRESENTED PERSONS WHO DO NOT HAVE VIDEO CAPABILITY MAY USE THE TELEPHONE DIAL-IN INFORMATION ON JUDGE BAISIER’S WEBPAGE.**

**THE RELIEF SOUGHT HEREIN IS WITHOUT PREJUDICE TO THE GUC TRUSTEE’S OR ANY PARTY IN INTEREST’S RIGHTS TO PURSUE FURTHER OBJECTIONS AGAINST THE CLAIMS LISTED ON EXHIBITS A-1, A-2, OR A-3 TO THIS OBJECTION.**

**Important Information Regarding the Objection**

Grounds for the Objection. By the Objection, the GUC Trustee is seeking to disallow and expunge or modify the Claim(s) listed in the schedules attached hereto as Exhibit A-1, Exhibit A-2, and Exhibit A-3 on the grounds that either (i) the Claim is duplicative or substantively duplicative of another Claim, (ii) the Claim is unsubstantiated, or (iii) the Claim is a workers’ compensation claim which is covered by insurance or the Employee Compensation Order.

Objection Procedures. On May 22, 2025, the United States Bankruptcy Court for the Northern District of Georgia (the “Court”) entered an order [Docket No. 1003] approving procedures for filing and resolving objections to Claims asserted against the Debtors in these chapter 11 cases (the “Objection Procedures”). A portion of the Objection Procedures is embedded with this notice. You may also access the Objection Procedures at the link included in this notice. **Please review the Objection Procedures to ensure your response to the Objection, if any, is timely and correctly filed and served.**

### **Resolving the Objection**

Parties Required to File a Response. If you disagree with the Objection filed with respect to your Claim, you must file a response (each, a “Response”) with the Court in accordance with the procedures described below and appear at the Hearing if such Response is not resolved prior to the Hearing.

Response Contents. Each Response must contain the following (at a minimum):

- (a) a caption stating the name of the Court, the names of the Debtors, the case number, and the Omnibus Objection to which the Response is directed, and, if applicable, the Proof of Claim number(s) related thereto from the claims register;
- (b) a concise statement setting forth the reasons why the Court should not grant the objection with respect to such Claim, including the factual and legal bases upon which the claimant will rely in opposing the Omnibus Objection;
- (c) a copy of any other documentation or other evidence of the Claim, to the extent not already included with the Claim, upon which the claimant will rely in opposing the objection; provided that the claimant need not disclose confidential, proprietary, or otherwise protected information in the Response; provided, further, that the claimant shall disclose to counsel for the Debtors or the GUC Trustee, as applicable, all information and provide copies of all documents that the claimant believes to be confidential, proprietary, or otherwise protected and upon which the claimant intends to rely in support of its Claim, subject to appropriate confidentiality constraints;
- (d) a declaration or other statement of a person with personal knowledge of the relevant facts that support the Response; and
- (e) the following contact information for the responding party:
  - (i) the name, address, telephone number, and email address of the responding claimant or the name, address, telephone number, and email address of the claimant’s attorney or designated representative to whom the attorneys for the Debtors or the GUC Trustee, as applicable, should serve a reply to the Response, if any; or
  - (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the claimant’s behalf.

Notice and Service. Your Response must be filed with the Court and served electronically using the Court’s electronic filing system and actually received by **4:00 p.m. (prevailing Eastern Time) on February 16, 2026, at 4:00 p.m. (ET)** (the “Response Deadline”) by the following parties (the “Notice Parties”):

- (a) the Office of the United States Trustee, 362 Richard Russell Federal Building, 75 Ted Turner Drive, SW, Atlanta, GA 30303, Attn: Jonathan S. Adams (jonathan.s.adams@usdoj.gov);
- (b) counsel to the Debtors, McDermott Will & Schulte LLP, 1180 Peachtree Street NE, Suite 3350, Atlanta, GA 30309, Attn: Daniel M. Simon (dsimon@mwe.com) and 444 W. Lake Street, Suite 4000, Chicago, IL 60606, Attn: Emily C. Keil (ekeil@mwe.com);
- (c) the GUC Trustee, Ryniker Consultants LLC, 1178 Broadway, 3rd Floor #1505, New York, NY 10001, Attn: Brian Ryniker (brian@rkc.llc); and
- (d) counsel to the GUC Trustee, Troutman Pepper Locke LLP, 875 Third Avenue, New York, NY 10022, Attn: Deborah Kovsky-Apap (deborah.kovsky@troutman.com), and 1313 N. Market Street, Suite 1000, Wilmington, DE 19801, Attn: Tori L. Remington (tori.remington@troutman.com).

Failure to Respond. A Response that is not filed and served in accordance with the procedures set forth herein may not be considered by the Court at the Hearing. Absent an agreement with the GUC Trustee resolving the Objection to a Claim, failure to timely file and serve a Response as set forth herein and appear at the Hearing may result in the Court granting the Objection without further notice or hearing. Upon entry of an order, affected creditors will be served with a copy of the same.

### **Discovery Related to the Objection**

Discovery. If the GUC Trustee determines that discovery is necessary in advance of a hearing on an Objection, the GUC Trustee will serve notice on the affected claimant and its counsel of record of a scheduled hearing to be treated as a status conference during which the parties will request that the Court issue a scheduling order to facilitate dismissal or resolution of the litigation. Any such notice may be incorporated into the initial agenda letter for the hearing or may be provided by separate notice.

### **Additional Information**

Additional Information. Copies of these procedures, the Objection, the Order, or any other pleadings (the “Pleadings”) filed in these chapter 11 cases are available at no cost at the Debtors’ restructuring website: <https://www.veritaglobal.net/lavie>. You may also obtain copies of any of the pleadings filed in these chapter 11 cases for a fee at the Court’s website at [www.ganb.uscourts.gov](http://www.ganb.uscourts.gov).

Reservation of Rights. NOTHING IN ANY OMNIBUS OBJECTION OR OBJECTION NOTICE IS INTENDED OR SHALL BE DEEMED TO CONSTITUTE (A) AN ADMISSION AS TO THE VALIDITY OF ANY PREPETITION CLAIM AGAINST A DEBTOR ENTITY OR THE GUC TRUST; (B) A WAIVER OF ANY RIGHT OF ANY DEBTOR OR THE GUC TRUSTEE, AS APPLICABLE, TO DISPUTE ANY PREPETITION CLAIM ON ANY GROUNDS, ASSERT COUNTERCLAIMS, RIGHTS OF OFFSET OR RECOUPMENT,

DEFENSES, OBJECT TO CLAIMS (OR OTHER CLAIMS OR CAUSES OF ACTION OF A CLAIMANT) ON ANY GROUNDS NOT PREVIOUSLY RAISED IN AN OBJECTION, UNLESS THE COURT HAS ALLOWED A CLAIM OR ORDERED OTHERWISE, OR SEEK TO ESTIMATE ANY CLAIM AT A LATER DATE; (C) A PROMISE OR REQUIREMENT TO PAY ANY PREPETITION CLAIM; (D) AN IMPLICATION OR ADMISSION THAT ANY PARTICULAR CLAIM IS OF A TYPE SPECIFIED OR DEFINED IN THIS MOTION OR ANY ORDER GRANTING THE RELIEF REQUESTED BY THIS MOTION; (E) A REQUEST OR AUTHORIZATION TO ASSUME ANY PREPETITION AGREEMENT, CONTRACT, OR LEASE PURSUANT TO SECTION 365 OF THE BANKRUPTCY CODE; OR (F) A WAIVER OF ANY RIGHT OF ANY DEBTOR OR THE GUC TRUSTEE, AS APPLICABLE, UNDER THE BANKRUPTCY CODE OR ANY OTHER APPLICABLE LAW.

Dated: January 16, 2026

**TROUTMAN PEPPER LOCKE LLP**

/s/ Tori L. Remington

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*Counsel for the GUC Trustee*

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

	)				
In re	)				Chapter 11
	)				
LAVIE CARE CENTERS, LLC, <i>et al.</i> <sup>1</sup>	)				Case No. 24-55507-PMB
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Debtors.	)				(Jointly Administered)
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**GUC TRUSTEE’S THIRD OMNIBUS OBJECTION TO (I) DUPLICATIVE CLAIMS,  
(II) UNSUBSTANTIATED CLAIMS, AND (III) WORKERS’ COMPENSATION  
CLAIMS AS SET FORTH ON EXHIBITS A-1 THROUGH A-3**

**THIS IS AN OBJECTION TO YOUR CLAIM. SUBSTANTIVE RIGHTS MAY BE AFFECTED BY THIS OBJECTION AND BY ANY FURTHER OBJECTION THAT MAY BE FILED. CLAIMANTS RECEIVING THIS OBJECTION SHOULD LOCATE THEIR NAMES AND CLAIMS ON EXHIBITS A-1, A-2, OR A-3 ATTACHED HERETO TO LEARN THE GROUNDS FOR THE OBJECTION PERTAINING TO THEIR CLAIMS AND THE RELIEF BEING SOUGHT BY THE GUC TRUSTEE.**

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**THE RELIEF SOUGHT HEREIN IS WITHOUT PREJUDICE TO THE GUC TRUSTEE’S OR ANY PARTY’S RIGHTS TO PURSUE FURTHER OBJECTIONS AGAINST THE CLAIMS LISTED ON EXHIBITS A-1, A-2, OR A-3 TO THIS OBJECTION.**

<sup>1</sup> 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.kccllc.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.

Ryniker Consultants, LLC, in its capacity as the trustee (the “GUC Trustee”) for the trust (the “GUC Trust”) established on behalf of the above-captioned debtors and debtors-in-possession (the “Debtors”) pursuant to the *Debtors’ Modified Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* [D.I. 730-1] (the “Plan”), hereby objects (this “Objection”) to the (i) claims identified on **Exhibit A-1** attached to the Proposed Order (the “Duplicative Claims”), (ii) the claims identified on **Exhibit A-2** attached to the Proposed Order (the “Unsubstantiated Claims”), and (iii) the claims identified on **Exhibit A-3** attached to the Proposed Order (the “Workers’ Compensation Claims”). In support of this Objection, the GUC Trustee respectfully represents as follows:

### **RELIEF REQUESTED**

1. By this Objection, the GUC Trustee requests entry of an order, substantially in the form attached hereto as **Exhibit A** (the “Proposed Order”), (i) disallowing and expunging the Duplicative Claims on **Exhibit A-1**, the Unsubstantiated Claims on **Exhibit A-2**, and the Workers’ Compensation Claims on **Exhibit A-3**.

### **JURISDICTION**

2. The United States Bankruptcy Court for the Northern District of Georgia, Atlanta Division (the “Court”) has jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b). Venue of these cases and the Objection in this District is proper under 28 U.S.C. §§ 1408 and 1409.

3. The predicates for the relief requested herein are Bankruptcy Code sections 105 and 502, Rule 3007(d)(1) of the Federal Rules of Bankruptcy Procedures (the “Bankruptcy Rules”), Rule 3007-1 of the Local Rules of the United States Bankruptcy Court for the Northern District of Georgia (the “Local Rules”), and the *Order (I) Approving (A) Omnibus Claims Objection Procedures and (B) Filing of Substantive Claims Objections, (II) Waiving the Requirement of*

*Bankruptcy Rule 3007(e)(6), and (III) Granting Related Relief* [Docket No. 1003] (the “Omnibus Claim Objection Procedures Order”).

### **BACKGROUND**

4. On June 2 and June 3, 2024 (the “Petition Date”), the Debtors each filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code with the Court (the “Chapter 11 Cases”). The Debtors remained in possession of their property and continued to operate their business as debtors-in-possession in accordance with Sections 1107 and 1108 of the Bankruptcy Code.

5. On June 13, 2024, the Office of the United States Trustee for Region 21 (the “U.S. Trustee”) appointed [D.I. 112] an official committee in the Chapter 11 Cases. No trustee or examiner has been appointed in the Chapter 11 Cases.

6. On July 2, 2024, the Court entered the *Order (I) Establishing Bar Dates for Filing Claims Against the Debtors; and (II) Granting Related Relief* [Docket No. 218] (the “Bar Date Order”). The Bar Date Order (a) established August 30, 2024, at 5:00 p.m. (prevailing Eastern Time) (the “General Bar Date”) as the last day for creditors that are not governmental units to file proofs of claim, proofs of interest, and requests for payment of administrative expense claims under Bankruptcy Code section 503(b)(9); (b) established November 29, 2024 at 5:00 p.m. (prevailing Eastern Time) (the “Governmental Bar Date”) as the last day for creditors that are governmental units to file proofs of claim, proofs of interest, and requests for payment of administrative expense claims under Bankruptcy Code section 503(b)(9); and (c) approved a form of bar date notice, proof of claim form, and other related procedures.

7. On December 5, 2024, the Court entered the *Findings of Fact, Conclusions of Law, and Order Approving on Final Basis and Confirming Debtors’ Modified Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* [Docket No. 735]

(the “Confirmation Order”), confirming the Debtors’ Plan. The Plan became effective on June 1, 2025 (the “Effective Date”). *See* Docket No. 1016.

8. In accordance with the Plan, the GUC Trust was formed on the Effective Date. The Plan grants the GUC Trustee, who oversees and administers the GUC Trust, the authority to reconcile and resolve claims of general unsecured creditors, including without limitation filing this Objection to the claims identified herein. *See* Plan, Art. VIII § J.

9. The GUC Trustee files this Objection in accordance with the Omnibus Claim Objection Procedures. *See* D.I. 1003.

### **BASIS FOR RELIEF REQUESTED**

10. Section 502(a) of the Bankruptcy Code provides, in pertinent part, that a “claim or interest, proof of which is filed under section 501 of this title, is deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). Once an objection to a claim is filed, the Court, after notice and a hearing, shall determine the allowed amount of the claim. *See* 11 U.S.C. § 502(b). When asserting a proof of claim against a bankrupt estate, a claimant must allege facts that, if true, would support a finding that the debtor is legally liable to the claimant. *In re Allegheny Int’l, Inc.*, 954 F.2d 167, 173 (3d Cir. 1992). Where the claimant alleges sufficient facts to support its claim, its claim is afforded prima facie validity. Fed. R. Bankr. P. 3001(f); *In re Allegheny Int’l Inc.*, 954 F.2d at 173. A party wishing to dispute such a claim must produce evidence in sufficient force to negate the claim’s prima facie validity. *In re Allegheny Int’l Inc.*, 954 F.2d at 173–74. In practice, the objecting party must produce evidence that would refute at least one of the allegations essential to the claim’s legal sufficiency. *Id.* Once the objecting party produces such evidence, the burden shifts back to the claimant to prove the validity of his or her claim by a preponderance of the evidence. *Id.*; *see also Dollinger v. BV Retail, LLC (In re S&Q Shack, LLC)*, 2015 Bankr. LEXIS

1166, at \*6-7 (N.D. Ga. Feb. 13, 2015). The burden of persuasion is always on the claimant. *See In re Moss*, No. 94- 11959, 1995 WL 17005342, at \*1 (Bankr. S.D. Ga. Sept. 28, 1995).

11. Pursuant to Bankruptcy Rule 3007(d), a debtor is permitted to file an omnibus objection to more than one claim if the objections are based on enumerated grounds, including that "they duplicate other claims . . . have been amended by subsequently filed proofs of claim . . . were not timely filed . . . were presented in a form that does not comply with applicable rules, and the objection states that the objector is unable to determine the validity of the claim because of the noncompliance . . . [or] they are interests, rather than claims . . ." Fed. R. Bankr. P. 3007(d). In addition, the Omnibus Claim Objection Procedures permit the Debtors and the GUC Trustee to file omnibus claim objections on additional grounds, including, among others, claims that seek recovery of amounts for which the Debtors are not liable or claims that fail to sufficiently specify the basis for the Claim or provide sufficient supporting documentation therefor. *See Omnibus Claim Objection Procedures* ¶¶ 1(b), (i). The Omnibus Claim Objection Procedures also permit the Debtors and the GUC Trustee to object to more than 100 claims in a single objection, notwithstanding the procedural limitations set forth in Bankruptcy Rule 3007(e). *See Omnibus Claim Objection Procedures Order* ¶¶ 3–4.

12. In accordance with the foregoing, the GUC Trustee files this Objection to disallow and expunge the Duplicative Claims, the Unsubstantiated Claims, and the Workers' Compensation Claims.

**A. The Duplicative Claims**

13. The GUC Trustee objects to the Duplicate Claims identified on **Exhibit A-1** to the Proposed Order. Upon review, the GUC Trustee has determined that each Duplicate Claim reflects a duplicative or substantially duplicative claim filed by a creditor. For example, the Duplicate Claim may have been filed on behalf of the same claimant, in the same amount and priority, or on

account of the same alleged liability against the same debtor. Each Duplicate Claim also does not indicate that it amends a previous claim. Accordingly, the GUC Trustee seeks to disallow and expunge each Duplicate Claim listed under the column “Duplicate Claim to be Disallowed” on **Exhibit A-1**. Failing to disallow each Duplicate Claim would result in such creditor receiving double recovery at the expense of claimants who filed one proof of claim on account of a Debtor’s liability.

14. For the foregoing reasons, the GUC Trustee objects to the Duplicate Claims and requests that this Court disallow and expunge the Duplicate Claims in their entirety. For the avoidance of doubt, the corresponding surviving claim(s) listed under the column “Surviving Claim” on **Exhibit A-1** shall not be affected by this Objection.<sup>2</sup>

**B. The Unsubstantiated Claims**

15. The GUC Trustee objects to the Unsubstantiated Claims identified on **Exhibit A-2** to the Proposed Order. Following its review of the Unsubstantiated Claims, the GUC Trustee has determined that each Unsubstantiated Claim lacks sufficient support and documentation to establish a *prima facie* claim of liability for which the Debtors are responsible.

16. Failing to disallow and expunge each Unsubstantiated Claim would result in such creditor receiving a recovery for which it is not entitled. Therefore, the Unsubstantiated Claims identified on **Exhibit A-2** should be disallowed and expunged.

**C. The Workers’ Compensation Claims**

17. The GUC Trustee objects to the Workers’ Compensation Claims identified on **Exhibit A-3** to the Proposed Order. Upon review, the GUC Trustee has determined that each

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<sup>2</sup> The GUC Trustee reserves all rights to object to each “Surviving Claim” on any grounds permitted under applicable law.

Workers' Compensation Claim reflects a claim that is covered by insurance. As set forth in the Debtors' first day employee motion (D.I. 13), the Debtors maintained high-deductible workers' compensation insurance in the ordinary course of business with AXA XL. Claims made by employees through the workers' compensation program are paid through a collateral account held and controlled by AXA XL. Under the *Final Order Authorizing Debtors to (I) Pay Prepetition Wages, Compensation, and Employee Benefits, (II) Continue Certain Employee Benefit Programs in the Ordinary Course, and (III) Granting Related Relief* [D.I. 174] (the "Employee Compensation Order"), the Debtors were authorized to, among other things, (i) pay any and all Workers' Compensation Obligations (as defined in the Employee Compensation Order), as and when such obligations became due, and (ii) continue the workers' compensation program postpetition. See Employee Compensation Order ¶¶ 2, 6, 7.

18. Based on the foregoing, the Workers' Compensation Claims will be paid through the Debtors' available workers' compensation insurance. Accordingly, the Workers' Compensation Claims may not be paid by the GUC Trust. See Plan, Art. V § G (precluding a recovery from the GUC Trust for those claims paid or payable by third parties, such as insurer carriers).

19. For the foregoing reasons, the GUC Trustee objects to the Workers' Compensation Claims identified on Exhibit A-3 and requests that this Court disallow and expunge the Substantiated Claims in their entirety.

### **RESERVATION OF RIGHTS**

20. The GUC Trustee hereby reserves all rights to further object to any claim described herein and to amend, modify, and/or supplement this Objection. In addition, the GUC Trustee

reserves the right to object to all other claims filed in the Chapter 11 Cases in accordance with the Plan.

**NOTICE**

21. The GUC Trustee will provide notice of the Objection to: (a) the U.S. Trustee; (b) counsel to the Debtors; and (c) the holder (and counsel to such holder) of each Duplicative Claim, Unsubstantiated Claim, and Workers' Compensation Claim. The GUC Trustee submits that no further notice is required.

**COMPLIANCE WITH OMNIBUS CLAIM OBJECTION  
PROCEDURES AND LOCAL RULE 3007-1**

22. To the best of the GUC Trustee's knowledge and belief, this Objection, including its exhibits, materially complies with the Omnibus Claim Objection Procedures and Local Rule 3007-1, as may be modified by the Omnibus Claim Objection Procedures. To the extent that the Objection does not comply with the Omnibus Claim Objection Procedures or Local Rule 3007-1, as may be modified by the Omnibus claim Objection Procedures, the GUC Trustee submit that the deviations are immaterial and respectfully request that those requirements be waived.

WHEREFORE, the GUC Trustee respectfully requests that the Court enter the Proposed Order and grant such other and further relief to the GUC Trustee as the Court may deem proper.

Dated: January 16, 2026

**TROUTMAN PEPPER LOCKE LLP**

/s/ Tori L. Remington

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-and-

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*Counsel for the GUC Trustee*

**Exhibit A**

**Proposed Order**

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

	)	Chapter 11
In re	)	
	)	Case No. 24-55507-PMB
LAVIE CARE CENTERS, LLC, <i>et al.</i> <sup>1</sup>	)	
	)	(Jointly Administered)
Debtors.	)	
	)	<b>Re: D.I.</b> _____
	)	
	)	

**ORDER SUSTAINING THE GUC TRUSTEE’S THIRD OMNIBUS OBJECTION TO (I) DUPLICATIVE CLAIMS, (II) UNSUBSTANTIATED CLAIMS, AND (III) WORKERS’ COMPENSATION CLAIMS AS SET FORTH ON EXHIBITS A-1 THROUGH A-3**

Upon consideration of *The GUC Trustee’s Third Omnibus Objection to (I) Duplicative Claims, (II) Unsubstantiated Claims, and (III) Workers’ Compensation Claims as Set Forth on Exhibit A-1 Through A-3* [\_\_\_\_\_] (the “Objection”)<sup>2</sup> filed by the GUC Trustee seeking to disallow and expunge the claims identified on **Exhibits A-1 through A-3** to this Order; and the Court

<sup>1</sup> 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.kccllc.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.

<sup>2</sup> Capitalized terms not defined herein are defined in the Objection.

having jurisdiction over the Objection pursuant to 28 U.S.C. §§ 1334 and 157(b), the Objection being a core matter pursuant to 28 U.S.C. § 157(b)(2), the Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Objection is in the best interests of the Debtors' estates, their creditors, residents and other parties in interest; and the Court being able to enter a final order consistent with Article III of the United States Constitution; and the GUC Trustee having filed a notice setting the Objection and any responses thereto for a hearing on February 23, 2026, at 10:00 a.m. (ET) (the "Hearing"); and the Court having found that notice of the Objection and opportunity for hearing on the Objection were appropriate under the circumstances and no other notice need be provided; and the Court having reviewed and considered any response to the Objection; and having found that the legal and factual bases set forth in the Objection and at the Hearing establish just cause for the relief granted herein; and after due deliberation thereon; and good and sufficient cause appearing therefor, it is hereby ORDERED that:

1. The Objection is **SUSTAINED** as set forth herein.
2. The Duplicate Claims identified on **Exhibit A-2** hereto are hereby disallowed and expunged in their entirety. The GUC Trustee's rights to object to the "Surviving Claim" identified on **Exhibit A-2** on any grounds permitted under applicable law are hereby preserved.
3. The Unsubstantiated Claims identified on **Exhibit A-2** attached hereto are hereby disallowed and expunged in their entirety.
4. The Workers' Compensation Claims identified on **Exhibit A-3** attached hereto are hereby disallowed and expunged in their entirety; *provided, however*, nothing herein shall affect the terms of the *Final Order Authorizing Debtors to (I) Pay Prepetition Wages, Compensation,*

*and Employee Benefits, (II) Continue Certain Employee Benefit Programs in the Ordinary Course, and (III) Granting Related Relief* [D.I. 174] entered by this Court.

5. The GUC Trustee shall not make any cash or other distribution on account of the Amended and Superseded Claims, the Unsubstantiated Claims, or the Workers' Compensation Claims disallowed by this Order.

6. The objection to each Claim addressed in the Objection constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each Claim. Any stay of this Order pending appeal by any of the claimants subject to this Order shall only apply to the contested matter that involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters covered hereby.

7. The GUC Trustee is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order.

8. The claims register in these chapter 11 cases may be revised to comport with this Order.

9. The GUC Trustee shall, within three (3) business days of entry of this Order, cause a copy of this Order to be served by electronic mail or first-class mail, as applicable, on all parties served with the Objection, and a certificate of service confirming such service shall be filed promptly thereafter.

10. This Court shall retain jurisdiction over all affected parties with respect to any matters, claims, or rights arising from or related to the implementation and interpretation of this Order.

END OF DOCUMENT

Prepared and Presented by:

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**Exhibit A-1**

**Substantively Duplicative Claims**

<u>#</u>	<u>Creditor Name</u>	<u>Claim to be Disallowed</u>	<u>Date Filed</u>	<u>Claim Amount</u>	<u>Debtor Name (for Claim to be Disallowed)</u>	<u>Surviving Claim</u>	<u>Reason for Disallowance</u>
1	Gale Healthcare Solutions-Florida LLC	720	07/22/2024	\$10,065,464.03	LaVie Care Centers LLC	1068, 1126, 1121, 1117, 1114, 1805, 1055, 1063, 1079, 1076, 1057, 1075, 1102, 1110, 1111, 1107, 1109, 1100, 1123, 1095, 1103, 1193, 1190, 1192	This claim is substantively duplicative of the Surviving Claim(s).
2	Gale Healthcare Solutions-Florida LLC	3824	08/30/2024	\$512,293.14	9035 Bryan Dairy Road Operations LLC	1075	This claim is substantively duplicative of the Surviving Claim(s).
3	Gale Healthcare Solutions-Florida LLC	3825	08/30/2024	\$567,368.64	1026 Albee Farm Road Operations LLC	1079	This claim is substantively duplicative of the Surviving Claim(s).
4	Gale Healthcare Solutions-Florida LLC	3826	08/30/2024	\$774,740.32	741 South Beneva Road Operations LLC	1068	This claim is substantively duplicative of the Surviving Claim(s).
5	Gale Healthcare Solutions-Florida LLC	4192	08/30/2024	\$327,291.15	1465 Oakfield Drive Operations LLC	1076	This claim is substantively duplicative of the Surviving Claim(s).
7	Gale Healthcare Solutions-Florida LLC	4194	08/30/2024	\$26,742.35	1111 Drury Lane Operations LLC	1111	This claim is substantively duplicative of the Surviving Claim(s).
8	Gale Healthcare Solutions-Florida LLC	4195	08/30/2024	\$455,473.09	3735 Evans Avenue Operations LLC	1100	This claim is substantively duplicative of the Surviving Claim(s).
9	Gale Healthcare Solutions-Florida LLC	4196	08/30/2024	\$365,877.27	518 West Fletcher Avenue Operations LLC	1102	This claim is substantively duplicative of the Surviving Claim(s).

<u>#</u>	<u>Creditor Name</u>	<u>Claim to be Disallowed</u>	<u>Date Filed</u>	<u>Claim Amount</u>	<u>Debtor Name (for Claim to be Disallowed)</u>	<u>Surviving Claim</u>	<u>Reason for Disallowance</u>
10	Gale Healthcare Solutions-Florida LLC	4197	08/30/2024	\$175,274.96	Green Cove Facility Operations LLC	1114	This claim is substantively duplicative of the Surviving Claim(s).
11	Gale Healthcare Solutions-Florida LLC	4198	08/30/2024	\$62,933.75	2916 Habana Way Operations LLC	1121	This claim is substantively duplicative of the Surviving Claim(s).
12	Gale Healthcare Solutions-Florida LLC	4200	08/30/2024	\$108,568.74	777 Ninth Street North Operations LLC	1190	This claim is substantively duplicative of the Surviving Claim(s).
13	Gale Healthcare Solutions-Florida LLC	4201	08/30/2024	\$699,689.06	1445 Howell Avenue Operations LLC	1107	This claim is substantively duplicative of the Surviving Claim(s).
14	Gale Healthcare Solutions-Florida LLC	4202	08/30/2024	\$75,519.67	1061 Virginia Street Operations LLC	1110	This claim is substantively duplicative of the Surviving Claim(s).
15	Gale Healthcare Solutions-Florida LLC	4203	08/30/2024	\$412,999.55	St. Petersburg Facility Operations LLC	1117	This claim is substantively duplicative of the Surviving Claim(s).
16	Gale Healthcare Solutions-Florida LLC	4205	08/30/2024	\$129,859.53	6700 NW 10th Place Operations LLC	1123	This claim is substantively duplicative of the Surviving Claim(s).
17	Gale Healthcare Solutions-Florida LLC	4206	08/30/2024	\$94,134.70	Osprey Nursing and Rehabilitation LLC	1126	This claim is substantively duplicative of the Surviving Claim(s).
18	Gale Healthcare Solutions-Florida LLC	4207	08/30/2024	\$1,327,247.59	Jacksonville Facility Operations LLC	1055	This claim is substantively duplicative of the Surviving Claim(s).
19	Gale Healthcare Solutions-Florida LLC	4208	08/30/2024	\$482,382.71	North Fort Myers Facility Operations LLC	1103	This claim is substantively duplicative of the Surviving Claim(s).
20	Gale Healthcare Solutions-Florida LLC	4209	08/30/2024	\$39,862.04	Orange Park Facility Operations LLC	1193	This claim is substantively duplicative of the Surviving Claim(s).
21	Gale Healthcare Solutions-Florida LLC	4210	08/30/2024	\$92,775.24	9355 San Jose Boulevard Operations LLC	1192	This claim is substantively duplicative of the Surviving Claim(s).

<u>#</u>	<u>Creditor Name</u>	<u>Claim to be Disallowed</u>	<u>Date Filed</u>	<u>Claim Amount</u>	<u>Debtor Name (for Claim to be Disallowed)</u>	<u>Surviving Claim</u>	<u>Reason for Disallowance</u>
22	Gale Healthcare Solutions-Florida LLC	4211	08/30/2024	\$261,173.47	1820 Shore Drive Operations LLC	1109	This claim is substantively duplicative of the Surviving Claim(s).
23	Gale Healthcare Solutions-Florida LLC	4212	08/30/2024	\$1,112,804.02	1010 Carpenters Way Operations LLC	1063	This claim is substantively duplicative of the Surviving Claim(s).
24	MileStone Staffing, Inc.	3573	08/29/2024	\$634,123.48	Consulate Management Company III LLC	3508, 3520, 3523, 3526, 3549, 3556, 3565	This claim is substantively duplicative of the Surviving Claim(s).
25	MileStone Staffing, Inc.	3582	08/29/2024	\$704,430.63	LaVie Care Centers LLC	3508, 3520, 3523, 3526, 3549, 3556, 3565	This claim is substantively duplicative of the Surviving Claim(s).
27	SUPERIOR MEDICAL STAFFING	549	07/19/2024	\$3,215,575.30	LaVie Care Centers LLC	1221, 1245, 1241, 1226, 1237, 1233, 1240, 1250, 1229, 1232, 1224, 1239, 1205, 1256, 1202, 1789, 1787	This claim is substantively duplicative of the Surviving Claim(s).
28	Superior Medical Staffing, LLC	4176	08/30/2024	\$47,778.84	15204 West Colonial Drive Operations LLC	1224	This claim is substantively duplicative of the Surviving Claim(s).
29	Superior Medical Staffing, LLC	4177	08/30/2024	\$998,070.08	1851 Elkcarn Boulevard Operations LLC	1789	This claim is substantively duplicative of the Surviving Claim(s).
30	Superior Medical Staffing, LLC	4178	08/30/2024	\$193,027.82	3001 Palm Coast Parkway Operations LLC	1233	This claim is substantively duplicative of the Surviving Claim(s).
31	Superior Medical Staffing, LLC	4179	08/30/2024	\$152,906.00	Green Cove Facility Operations LLC	1239	This claim is substantively duplicative of the Surviving Claim(s).
32	Superior Medical Staffing, LLC	4181	08/30/2024	\$236,997.18	710 North Sun Drive Operations LLC	1241	This claim is substantively duplicative of the Surviving Claim(s).
33	Superior Medical Staffing, LLC	4182	08/30/2024	\$74,887.75	6700 NW 10th Place Operations LLC	1250	This claim is substantively duplicative of the Surviving Claim(s).

<u>#</u>	<u>Creditor Name</u>	<u>Claim to be Disallowed</u>	<u>Date Filed</u>	<u>Claim Amount</u>	<u>Debtor Name (for Claim to be Disallowed)</u>	<u>Surviving Claim</u>	<u>Reason for Disallowance</u>
34	Superior Medical Staffing, LLC	4183	08/30/2024	\$255,059.07	650 Reed Canal Road Operations LLC	1221	This claim is substantively duplicative of the Surviving Claim(s).
35	Superior Medical Staffing, LLC	4184	08/30/2024	\$18,701.23	Osprey Nursing and Rehabilitation LLC	1256	This claim is substantively duplicative of the Surviving Claim(s).
36	Superior Medical Staffing, LLC	4185	08/30/2024	\$185,744.20	4641 Old Canoe Creek Road Operations LLC	1240	This claim is substantively duplicative of the Surviving Claim(s).
37	Superior Medical Staffing, LLC	4186	08/30/2024	\$4,820.19	Jacksonville Facility Operations LLC	1205	This claim is substantively duplicative of the Surviving Claim(s).
38	Superior Medical Staffing, LLC	4187	08/30/2024	\$24,561.15	Orange Park Facility Operations LLC	1245	This claim is substantively duplicative of the Surviving Claim(s).
39	Superior Medical Staffing, LLC	4188	08/30/2024	\$263,297.71	7950 Lake Underhill Road Operations LLC	1229	This claim is substantively duplicative of the Surviving Claim(s).
40	Superior Medical Staffing, LLC	4189	08/30/2024	\$605,106.82	1550 Jess Parrish Court Operations LLC	1237	This claim is substantively duplicative of the Surviving Claim(s).
41	Superior Medical Staffing, LLC	4190	08/30/2024	\$17,061.73	9355 San Jose Boulevard Operations LLC	1232	This claim is substantively duplicative of the Surviving Claim(s).
42	Superior Medical Staffing, LLC	4191	08/30/2024	\$14,892.04	1010 Carpenters Way Operations LLC	1226	This claim is substantively duplicative of the Surviving Claim(s).

**Exhibit A-2**

**Unsubstantiated Claims**

<b>#</b>	<b><u>Claimant</u></b>	<b><u>Claim Number</u></b>	<b><u>Date Filed</u></b>	<b><u>Asserted Claim Amount</u></b>	<b><u>Reason for Disallowance</u></b>
1	ANDERSON, JOANNE	1484	08/20/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
2	Armentrout, Megan N.	588	07/18/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
3	Barbara Caruso	195	07/14/2024	Unknown	The claim asserts an “unk” claim on account of overtime pay. No backup or supporting documentation is attached to the claim.
4	Blackwell, Michanda C.	598	07/20/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
5	Blake, Georgia	1666	08/20/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
6	Calluso, Angeli E.	181	07/13/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
7	CLANTON, AMBER L.	700	07/24/2024	Unknown	This claim has been reclassified as an unsecured claim under the <i>Order Sustaining Debtors’ Six Omnibus Objection to Unsubstantiated Claims Set Forth on Schedule 1</i> . D.I. 1071. The claim does not identify an amount owed by any Debtor and does not sufficiently identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.

<u>#</u>	<u>Claimant</u>	<u>Claim Number</u>	<u>Date Filed</u>	<u>Asserted Claim Amount</u>	<u>Reason for Disallowance</u>
8	Collins, Kawanis L.	547	07/22/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
9	COLLINS, STEVEN R.	1736	08/20/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
10	Cynthia Boss	436	07/18/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
11	EZELL, LASHAWN	197	07/15/2024	Blank	The claim does not identify an amount owed by any Debtor and does not sufficiently identify or provide a basis for the claim. The basis for the claim is purportedly “wrongful termination,” but no backup or supporting documentation is attached to the claim. The applicable Debtor’s schedule and statements do not reflect a lawsuit filed by this claimant.
12	Ferguson, Maya L.	373	07/16/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
13	FOMBAN, STANLEY	356	07/16/2024	Blank	The claim does not identify an amount owed by any Debtor and does not sufficiently identify or provide a basis for the claim. The basis for the claim is purportedly “services performed,” but no backup or supporting documentation is attached to the claim.
14	Ford, Valon	434	07/17/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
15	GOMBOS, JILL A.	193	07/14/2024	Blank	The claim does not identify an amount owed by any Debtor and does not sufficiently identify or provide a basis for the claim. The basis for the claim is purportedly “services performed,” but no backup or supporting documentation is attached to the claim.

<u>#</u>	<u>Claimant</u>	<u>Claim Number</u>	<u>Date Filed</u>	<u>Asserted Claim Amount</u>	<u>Reason for Disallowance</u>
16	HINES, RHONDA E.	372	07/16/2024	Blank	The claim does not identify an amount owed by any Debtor and does not sufficiently identify or provide a basis for the claim. The basis for the claim is purportedly “services performed,” but no backup or supporting documentation is attached to the claim.
17	HOLMES, CATHERINE	909	08/05/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
18	ICE, ASHLEY V.	191	07/13/2024	\$3,350.00	This claim has been reclassified as an unsecured claim under the <i>Order Sustaining Debtors’ Six Omnibus Objection to Unsubstantiated Claims Set Forth on Schedule 1</i> . D.I. 1071. The claim does not identify an amount owed by any Debtor and does not sufficiently identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
19	JAVIER, LUISA M.	3163	08/29/2024	Unliquidated	This claim has been reclassified to an unsecured claim under the <i>Order Sustaining Debtors’ Six Omnibus Objection to Unsubstantiated Claims Set Forth on Schedule 1</i> . D.I. 1071. The claim does not identify an amount owed by any Debtor and does not sufficiently identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
20	Johnson, Jeneat L.	1210	08/14/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
21	JOHNSON, SELENA	196	07/15/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
22	Jones, Christy L.	1922	08/24/2024	Blank	The claim does not identify an amount owed by any Debtor and does not sufficiently identify or provide a basis for the claim. The basis for the claim is purportedly “services performed,” but no backup or supporting documentation is attached to the claim.

<u>#</u>	<u>Claimant</u>	<u>Claim Number</u>	<u>Date Filed</u>	<u>Asserted Claim Amount</u>	<u>Reason for Disallowance</u>
23	JONES, CORINE	855	07/31/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
24	JONES, TAKETA C.	2423	08/28/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
25	Kieisha McClain	205	07/15/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
26	Latoya Nelson	435	07/18/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
27	Lewis, Shynilla	627	07/23/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
28	Lynntoria Granger	437	07/18/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
29	MOORE, SHAINA K.	732	07/25/2024	Unknown	The claim does not identify an amount owed by any Debtor and does not sufficiently identify or provide a basis for the claim. The basis for the claim is purportedly "services/employment with company," but no backup or supporting documentation is attached to the claim.
30	Quesinberry, Kimberly	606	07/22/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
31	Rios, Gillian	831	07/28/2024	Undetermined	The claim does not identify an amount owed by any Debtor and does not sufficiently identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.

<u>#</u>	<u>Claimant</u>	<u>Claim Number</u>	<u>Date Filed</u>	<u>Asserted Claim Amount</u>	<u>Reason for Disallowance</u>
32	RIVERS, ROBYN S.	604	07/20/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
33	Roby, Victoria	923	08/06/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
34	Sabrina Nicholson	137	07/08/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
35	Samuels, Cris-Carol	965	08/07/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
36	SCHWEITZER, AVERY	3723	08/29/2024	Unknown	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
37	SINGLETARY, ATALAYA	375	07/17/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
38	STINSON, TAMIKA	778	07/29/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
39	Strange, Gwendolyn	374	07/16/2024	Blank	The claim does not identify an amount owed by any Debtor and does not sufficiently identify or provide a basis for the claim. The basis for the claim is purportedly "services performed," but no backup or supporting documentation is attached to the claim.
40	STULL, APRIL S.	853	07/31/2024	Unknown	The claim does not identify an amount owed by any Debtor and does not sufficiently identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.

<u>#</u>	<u>Claimant</u>	<u>Claim Number</u>	<u>Date Filed</u>	<u>Asserted Claim Amount</u>	<u>Reason for Disallowance</u>
41	SYLVAIN, ANNE	729	07/24/2024	Blank	The claim does not identify an amount owed by any Debtor and does not sufficiently identify or provide a basis for the claim. The basis for the claim is purportedly “services performed,” but no backup or supporting documentation is attached to the claim.
42	Teyana Johnson	354	07/15/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
43	THOMAS, BRENDA J.	2250	08/28/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
44	Tippo, Ingrid	370	07/16/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
45	Tyler, Tanaya S.	202	07/14/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.
46	Williams, Shwanda M.	204	07/15/2024	Blank	The claim does not identify an amount owed by any Debtor and does not identify or provide a basis for the claim. No backup or supporting documentation is attached to the claim.

**Exhibit A-3**

**Workers' Compensation Claims**

<u>#</u>	<u>Claimant</u>	<u>Claim Number</u>	<u>Date Filed</u>	<u>Asserted Claim Amount</u>	<u>Reason for Disallowance</u>
1	Boyd, Evelyn	1822	8/22/2024	Unliquidated	This claim asserts an unliquidated workers' compensation claim. This claim should be addressed through the Debtors' workers' compensation insurer or the workers' compensation program. <i>See</i> D.I. 174.
2	Boyd, Evelyn	1825	8/22/2024	Unliquidated	This claim asserts an unliquidated workers' compensation claim. This claim should be addressed through the Debtors' workers' compensation insurer or the workers' compensation program. <i>See</i> D.I. 174.
3	Burch, Nellie	1834	8/22/2024	Unliquidated	This claim asserts an unliquidated workers' compensation claim. This claim should be addressed through the Debtors' workers' compensation insurer or the workers' compensation program. <i>See</i> D.I. 174.
4	Steele, Tawanna	1832	8/22/2024	Unliquidated	This claim asserts an unliquidated workers' compensation claim. This claim should be addressed through the Debtors' workers' compensation insurer or the workers' compensation program. <i>See</i> D.I. 174.
5	Steele, Tawanna	1823	8/22/2024	Unliquidated	This claim asserts an unliquidated workers' compensation claim. This claim should be addressed through the Debtors' workers' compensation insurer or the workers' compensation program. <i>See</i> D.I. 174.
6	Steele, Tawanna	1827	8/22/2024	Unliquidated	This claim asserts an unliquidated workers' compensation claim. This claim should be addressed through the Debtors' workers' compensation insurer or the workers' compensation program. <i>See</i> D.I. 174.
7	Steele, Tawanna	1828	8/22/2024	Unliquidated	This claim asserts an unliquidated workers' compensation claim. This claim should be addressed through the Debtors' workers' compensation insurer or the workers' compensation program. <i>See</i> D.I. 174.