



**PLEASE BE AWARE THAT THE GUC TRUSTEE IS ASKING THE COURT TO DISALLOW AND EXPUNGE 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 MARCH 25, 2026, AT 4:00 P.M. (PREVAILING EASTERN TIME). YOUR RESPONSE MUST STATE WHY THE OBJECTION IS NOT VALID. IF YOU DO NOT TIMELY FILE A RESPONSE YOUR CLAIM MAY BE DISALLOWED, EXPUNGED, OR ELIMINATED WITHOUT FURTHER NOTICE OR HEARING.**

**A HEARING (THE “HEARING”) ON THE OBJECTION AND ANY RESPONSES FILED THERETO WILL TAKE PLACE APRIL 14, 2026 AT 9:30 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](http://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-PAULMBAISIER](https://WWW.GANB.USCOURTS.GOV/CONTENT/HONORABLE-PAULMBAISIER).**

**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 ANY EXHIBIT TO THIS OBJECTION.**

**Important Information Regarding the Objection**

Grounds for the Objection. By the Objection, the GUC Trustee is seeking to disallow and expunge the Claim(s) listed in the schedules attached hereto as Exhibit A-1, Exhibit A-2, and

Exhibit A-3 on the grounds that: (i) the Claim was not timely filed; (ii) the Claim is a duplicate; or (iii) the Claim has been satisfied.

Objection Procedures. On May 22, 2025, the United States Bankruptcy Court for the Northern District of Georgia (the “Court”) entered an order [DE 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 March 25, 2026 (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](mailto:jonathan.s.adams@usdoj.gov));
- (b) counsel to the Debtors, McDermott Will & Emery LLP, 1180 Peachtree Street NE, Suite 3350, Atlanta, GA 30309, Attn: Daniel M. Simon ([dsimon@mwe.com](mailto:dsimon@mwe.com)) and 444 W. Lake Street, Suite 4000, Chicago, IL 60606, Attn: Emily C. Keil ([ekeil@mwe.com](mailto: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](mailto:brian@rkc.llc)); and
- (d) co-counsel to the GUC Trustee, PARKER, HUDSON, RAINIER & DOBBS LLP, 303 Peachtree Street NE, Suite 3600 Atlanta, Georgia 30308, Attn: Harris B. Winsberg ([hwinsberg@phrd.com](mailto:hwinsberg@phrd.com)) and Matthew G. Roberts ([mroberts@phrd.com](mailto:mroberts@phrd.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 Motion, 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: February 23, 2026

**PARKER, HUDSON, RAINER &  
DOBBS LLP**

By: /s/Matthew G. Roberts

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UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

In re:	)	
LAVIE CARE CENTERS, LLC, <i>et al.</i> <sup>1</sup>	)	Chapter 11
Debtors.	)	Case No. 24-55507-PMB
	)	Jointly Administered
<hr/>	)	
RYNIKER CONSULTANTS, LLC, Trustee for the GUC Trust,	)	<b>CONTESTED MATTER</b>
Movant,	)	<b>Hearing Date: April 14, 2026 at 9:30am</b>
vs.	)	<b>Objection Deadline: March 25, 2026 at 4:00PM (Eastern)</b>
ATLANTA OFFICE TECHNOLOGIES, INC.; FLORIDA POWER & LIGHT CO.; LEAF CAPITAL FUNDING, LLC; ZURICH AMERICAN INSURANCE COMPANY; HEALTHSPRING CIGNA HEALTH AND LIFE INSURANCE COMPANY; and	)	
VICKIE MCHENRY,	)	
<hr/> Respondents.	)	

**GUC TRUSTEE’S FOURTH OMNIBUS OBJECTION TO CERTAIN (I) LATE CLAIMS; (II) DUPLICATE CLAIMS; AND (III) NO LIABILITY CLAIMS**

**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.**

<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.

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**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 AND A-2 TO THIS OBJECTION.**

Ryniker Consultants, LLC, in its capacity as the “GUC Trustee” for 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* [DE 730-1] (the “Plan”), hereby objects (this “Objection”) to the claims identified on (i) Exhibit A-1 attached to the Proposed Order (the “Late Claims”), (ii) Exhibit A-2 attached to the Proposed Order (the “Duplicate Claims”), and (iii) Exhibit A-3 attached to the Proposed Order (the “No Liability Claims”). In support of this Objection, the GUC Trustee respectfully states 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”), disallowing and expunging the Late Claims on Exhibit A-1, the Duplicate Claims on Exhibit A-2, and the No Liability Claims on Exhibit A-3.

## **JURISDICTION & VENUE**

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 in this District is proper under 28 U.S.C. §§ 1408 and 1409.

3. The predicates for the relief requested herein are Sections 105 and 502 of the Bankruptcy Code (11 U.S.C. §§ 101, *et seq.*), 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 (each, a “Local Rule”), 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* [DE 1003] (the “Omnibus Claim Objection Procedures Order” approving the “Omnibus Claims Objection Procedures”).

## **BACKGROUND**

4. On June 2 and June 3, 2024, each of the Debtors filed with the Court voluntary petitions for relief under Chapter 11 of the Bankruptcy Code and thereby commenced the above-captioned “Chapter 11 Cases.”

5. The Debtors remained in possession of their property and operated their business as debtors-in-possession in accordance with Sections 1107 and 1108 of the Bankruptcy Code.<sup>2</sup> No trustee or examiner was appointed.

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<sup>2</sup> Additional information regarding the Debtors and these Chapter 11 Cases, including the nature of the Debtors’ business and operations and reasons for seeking Chapter 11 relief, is set forth in the *Declaration of Benjamin Jones in Support of Chapter 11 Petitions and First Day Pleadings* [DE 17].

6. On June 13, 2024, the Office of the United States Trustee for Region 21 appointed an official committee of unsecured creditors. *See* [DE 112]. Shortly thereafter, the Court entered its *Order (I) Establishing Bar Dates for Filing Claims Against the Debtors; and (II) Granting Related Relief* [DE 218] (the “Bar Date Order”).

7. 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.

8. In connection with the Bar Date Order, the Debtor’s claims and noticing agent (Verita Global *f/k/a* Kurtzman Carson Consultants, LLC) received, among others, the following proofs of claim (each, a “POC”):

- a. Five POCs from Atlanta Office Technologies (“AOT”), filed between August 15 and August 20, 2024, asserting against various Debtors claims in connection with certain leased office equipment;<sup>3</sup>
- b. Two POCs from Florida Power & Light Co. (“FPL”), filed July 3 and July 10, 2024, asserting against Debtor LaVie Care Centers LLC a claim for prepetition utilities services;<sup>4</sup>
- c. Several POCs from HealthSpring Cigna Health and Life Insurance Company (“Cigna”), including one filed August 28, 2024, asserting against Debtor Oak Grove HealthCare, LLC a claim in connection with a services agreement (the “ASPA”)<sup>5</sup>

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<sup>3</sup> *See* POC Nos. 1391, 1393, 1455, 1458, 1644.

<sup>4</sup> *See* POC Nos. 103, 151.

<sup>5</sup> *See* POC No. 2288.

- d. 25 POCs from LEAF Capital Funding, LLC (“LEAF”), filed between August 28 and August 29, 2024, asserting against various Debtors claims in connection with certain leased office equipment;<sup>6</sup>
- e. Two POCs from Zurich American Insurance Company (“Zurich”), filed September 24, 2024, asserting against Debtors Florida Health Care Properties LLC and MA Healthcare Holding Company LLC unliquidated claims in connection with certain insurance policies allegedly issued by Zurich;<sup>7</sup> and
- f. Three POCs from Vickie McHenry, filed August 19, 2024 and/or August 30, 2024, asserting against Debtors LaVie Care Centers LLC and 11565 Harts Road Operations LLC a claim concerning recovery for a settlement.<sup>8</sup>

9. On December 5, 2024, the Court entered its *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* [DE 735] (the “Confirmation Order”), confirming the Debtors’ Plan (as defined therein).

10. Pursuant to the Plan and Confirmation Order, the Debtors assumed (and assigned to the reorganized debtors) certain executory contracts and unexpired leases, paying a set cure amount in connection therewith. *See* [DE 731, Ex. A]. *See also* Confirmation Order, ¶ 26; Plan, art. VII.A. Included among those Assumed Executory Contracts and Unexpired Leases (as defined in the Plan) were certain agreements by and between one or more of the Debtors, on the one hand, and AOT, Cigna, or LEAF, on the other. *See* [DE 731, Ex. A]; [DE 916 (Cigna)]. In each case, the assumption of such Assumed Executory Contracts and Unexpired Leases resulted in the “full release and satisfaction of any Claims or defaults . . . arising under any assumed Executory Contract or Unexpired Lease at any time prior to the effective date of assumption.” Plan, Art. VII. § B; *see also* [DE 916, ¶ 2].

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<sup>6</sup> *See* POC Nos. 2895, 2950-55, 2957, 2959-60, 2962, 2964-65, 2971-76, 2978, 3000, 3002, 3004, 3007, 3009.

<sup>7</sup> *See* POC Nos. 5102-3.

<sup>8</sup> *See* POC Nos. 1723, 3597, 4069.

11. The Plan became effective on June 1, 2025, *see* [DE 1016], and the GUC Trust was formed on that 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 by filing this Objection to the claims identified herein. *See* Plan, Art. VIII § J.

**BASIS FOR RELIEF REQUESTED**

12. This Objection should be sustained pursuant to Section 502 of the Bankruptcy Code and Bankruptcy Rule 3007. Section 502 “governs the allowance of claims in bankruptcy,” *United States v. Sanford (In re Sanford)*, 979 F.2d 1511, 1513 (11th Cir. 1992), and in that context “lays down general instructions for the bankruptcy court.” *Welzel v. Advocate Realty Invs., LLC (In re Welzel)*, 275 F.3d 1308, 1317 (11th Cir. 2001). Relevant here, Section 502(b) provides that the court upon an objection to a proof of claim “shall determine the amount of [the] claim” and “shall [dis]allow” the claim “to the extent that,” among other things: (i) it “is unenforceable against the debtor and property of the debtor, under any agreement or applicable law,” 11 U.S.C. § 502(b)(1); or (ii) “proof of such claim is not timely filed,” *id.*, § 502(b)(9). This in essence requires the disallowance of claims that “would not be enforceable against the debtor” either “outside of bankruptcy,” *Sanford*, 979 F.2d at 1513, or as a result of the Bankruptcy Code, *In re US Airways, Inc.*, 2006 Bankr. LEXIS 352, at \*13 (Bankr. E.D. Va. Mar. 6, 2006), *aff’d sub nom.*, 2006 U.S. Dist. LEXIS 75707 (E.D. Va. Oct. 13, 2006), along with any claim filed after the bar date in a Chapter 11 case. *See, e.g., In re Borders Grp., Inc.*, 462 B.R. 48, 51 (Bankr. S.D.N.Y. 2011).<sup>9</sup>

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<sup>9</sup> The Bankruptcy Code and Bankruptcy Rules create a shifting burden of proof with respect to proofs of claim. For a claim to be afforded *prima facie* validity (and thus satisfy the claimant’s initial obligation to go forward), “the claimant must allege facts sufficient to support the claim.” *In re Allegheny Int’l, Inc.*, 954 F.2d 167, 173 (3d Cir. 1992). If the claimant does so, the “burden of going forward then shifts to the objector to produce evidence sufficient to negate the *prima facie* validity of the filed claim.” *Id.*; *accord, e.g., Dollinger v. BV Retail, LLC (In re S&Q Shack, LLC)*, 2015 Bankr. LEXIS 1166, at \*6 (Bankr. N.D. Ga. Feb. 13, 2015). And once “the objector produces sufficient evidence to negate one or more of the sworn facts in the proof of claim, the burden reverts to the claimant to prove

13. Bankruptcy Rule 3007, in turn, sets forth the default procedural framework for objections to claims. *See generally* FED. R. BANKR. P. 3007. As modified by the Omnibus Claims Objection Procedures approved in these Chapter 11 Cases, that procedural framework permits the debtor (or, here, the GUC Trustee) to file an omnibus objection to more than one claim if such claims, among other things: (i) “duplicate other claims” or “have been amended by later proofs of claim,” FED. R. BANKR. P. 3007(d)(2)(A), (B); (ii) “were not timely filed,” *id.* at (d)(2)(D); (iii) “have been satisfied or released during the case,” *id.* at (d)(2)(E); or seek recovery of amounts for which the Debtors are not liable, Omnibus Claims Objection Procedures ¶ 1(b). *See also* Omnibus Claims Objection Procedures Order ¶¶ 3-4 (permitting the GUC Trustee to object to more than 100 claims in a single omnibus objection, notwithstanding Bankruptcy Rule 3007(e)).

14. In accordance with the foregoing, the GUC Trustee files this Objection to disallow and expunge the Late Claims, Duplicate Claims, No Liability Claims as set forth herein.

**A. LATE CLAIMS**

15. The GUC Trustee objects to the Zurich POCs as Late Claims that should be disallowed pursuant to Section 502(b)(9).<sup>10</sup> Based upon a review and investigation, the GUC Trustee has determined that the Zurich POCs were filed on September 24, 2024 and as such were submitted after the General Bar Date (August 30, 2024). Those POCs therefore “[were] not timely filed” under Section 502(b)(9), 11 U.S.C. § 502(b)(9), and are subject to disallowance on that basis.

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the validity of the claim by a preponderance of the evidence.” *Allegheny Int’l*, 954 F.2d at 174. The burden of persuasion, however, is always on the claimant. *Id.*; *see also S&Q Shack*, 2015 Bankr. LEXIS 1166, at \*6-\*7.

<sup>10</sup> Late Claims are identified on Exhibit A-1 to the Proposed Order.

16. As evidenced by the Certificate of Service [DE 249], moreover, Zurich was provided timely notice of the General Bar Date and Governmental Bar Dates in accordance with the procedures outlined therein and thus had adequate notice of the applicable deadlines. Failure to disallow the Late Claims would result in such claimants receiving unwarranted recoveries to the detriment of creditors who timely filed proofs of claim. By contrast, disallowing the Late Claims is consistent with the Bankruptcy Code and will enable the GUC Trustee and its advisors to maintain an accurate claims register in these Chapter 11 Cases.

17. For the foregoing reasons, the GUC Trustee objects to the Late Claims and requests that this Court disallow and expunge the same in their entirety.

**B. DUPLICATE CLAIMS**

18. The GUC Trustee objects to the later-filed FPL POC (No. 151) and McHenry POCs Nos. 1723 and 4069 as Duplicate Claims that should be disallowed pursuant to Section 502(b)(1).<sup>11</sup> Upon review, the GUC Trustee has determined that (a) FPL POC No. 151 is identical to POC No. 103, also filed by FPL, and the former POC does not indicate that it amends the latter; and (b) McHenry POCs Nos. 1723 and 4069 are substantively identical to McHenry POC No. 3597 (and each other), and none of the McHenry POCs indicate that they are amendatory. Accordingly, the GUC Trustee seeks to disallow and expunge POC Nos. 151, 1723, and 4069. Failing to disallow these Duplicate Claims would result in FPL and Ms. McHenry receiving a double recovery on a single obligation in violation of applicable law. *Cf. In re BSA*, 137 F.4th 126, 168 (3d Cir. 2025) (“Double recovery is foreclosed by the rule that only one satisfaction may

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<sup>11</sup> Duplicate Claims are identified on Exhibit A-2 to the Proposed Order.

be obtained for a loss.” (quoting Restatement (Second) of Judgments § 49 cmt. A (Am. L. Inst. 1982) (internal quotations omitted)).

19. For the foregoing reasons, the GUC Trustee objects to the Duplicate Claims and requests that this Court disallow and expunge the same in their entirety. For the avoidance of doubt, the corresponding surviving claims (POC No. 103 and POC No. 3597) listed under the column “Surviving Claim” on Exhibit A-2 shall not be affected by this Objection. However, the GUC Trustee reserves all rights to object to such “Surviving Claims” on any grounds permitted under applicable law.

### C. NO LIABILITY CLAIMS

20. The GUC Trustee objects to the AOT, Cigna, and LEAF POCs as No Liability Claims that should be disallowed pursuant to Section 502(b)(1).<sup>12</sup> Upon review, the GUC Trustee has determined that the No Liability Claims reflect liabilities arising from Assumed Executory Contracts and Unexpired Leases—meaning such liabilities were “release[d] and satisf[ied],” Plan, Art. VII. § B, under the Plan and Confirmation Order. *See id.*; Confirmation Order, ¶ 26; [DE 916, ¶ 2]. The No Liability Claims therefore reflect claims for which the Debtors are no longer liable. Failing to disallow and expunge the No Liability Claims would result in such creditors receiving a recovery to which they are not entitled, at the expense of other claimants in these Chapter 11 Cases and in derogation of applicable law. *Cf., e.g., US Airways*, 2006 Bankr. LEXIS 352, at \*13, *aff’d sub nom.*, 2006 U.S. Dist. LEXIS 75707.

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<sup>12</sup> No Liability Claims are identified on Exhibit A-3 to the Proposed Order.

21. Based on the foregoing, the No Liability Claims on Exhibit A-3 should be disallowed and expunged in their entirety.<sup>13</sup>

**RESERVATION OF RIGHTS**

22. 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**

23. The GUC Trustee will provide notice of the Objection to: (a) the U.S. Trustee; (b) counsel to the Debtors; (c) the holder (and counsel to such holder) of the Late Claims, Duplicate Claims, No Liability Claims. The GUC Trustee submits that no further notice is required.

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

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

**CONCLUSION**

WHEREFORE, the GUC Trustee respectfully requests that the Court enter the Proposed

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<sup>13</sup> LEAF POC No. 2951 also amends and supersedes LEAF POC No. 2895. *See* POC Nos. 2895, 2951. Accordingly, POC No. 2895 should be disallowed and expunged for the additional reason that it is an amended and superseded claim.

Order and grant to the GUC Trustee such other and further relief as is just and right.

Respectfully submitted, February 23, 2026.

**PARKER, HUDSON, RAINER &  
DOBBS LLP**

By: /s/ Matthew G. Roberts

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

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<b>In re</b>	)	Chapter 11
	)	
<b>LAVIE CARE CENTERS, LLC, et al.<sup>1</sup></b>	)	Case No. 24-55507-PMB
	)	
<b>Debtors.</b>	)	(Jointly Administered)
	)	
	)	Re: Dkt. No. [**]
	)	

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**[PROPOSED] ORDER SUSTAINING THE GUC TRUSTEE’S FOURTH OMNIBUS  
OBJECTION TO (I) LATE CLAIMS; (II) DUPLICATE CLAIMS; AND (III) NO  
LIABILITY CLAIMS**

Upon consideration of *The GUC Trustee’s Fourth Omnibus Objection to Certain (I) Late Claims, (II) Duplicate Claims, and (III) No Liability Claims* (Dkt. No. \*\*) (the “**Objection**”)<sup>2</sup> filed

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<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.

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 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 hearing on April 14, 2026, at 9:30 A.M. (Prevailing Eastern Time) (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 Late Claims identified on **Exhibit A-1** hereto are hereby disallowed and expunged in their entirety.
3. 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; *provided, however,* that to the extent a Surviving Claim is disallowed under a previously or contemporaneously entered order or this Order, such Surviving Claim shall be disallowed in its

entirety.

4. The No Liability Claims identified on **Exhibit A-3** hereto are hereby disallowed and expunged in their entirety.

5. Notwithstanding the disallowance of any Duplicate Claim, nothing in this Order shall impair, limit, waive, or otherwise affect any claimant's right to pursue, access, or recover any insurance proceeds, if any, from one or more policies of the Debtor against which such Duplicate Claim was asserted.

6. The GUC Trustee shall not make any cash (or cash equivalent) distribution on account of the Late Claims, Duplicate Claims, and/or No Liability Claims disallowed by this Order.

7. 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.

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

9. The Claims Register in these Chapter 11 cases may be revised to comport with this Order.

10. The GUC Trustee shall, within five (5) business days of entry of the 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.

11. 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:

PARKER, HUDSON, RAINER & DOBBS LLP

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**Exhibit A-1**

**Late Claims**

**Exhibit A-1**

**Claim Objections – Late Filed Claims**

	<b><u>Creditor</u></b>	<b><u>Claim Number</u></b>	<b><u>Claim Amount</u></b>	<b><u>Claim Filing Date</u></b>	<b><u>Reason for Disallowance</u></b>
<b>1.</b>	Zurich American Insurance Company	5102	\$1 [Contingent/Unliquidated]	9/24/2024	This claim was filed after the General Bar Date (August 30, 2024)
<b>2.</b>	Zurich American Insurance Company	5103	\$1 [Contingent/Unliquidated]	9/24/2024	This claim was filed after the General Bar Date (August 30, 2024)

**Exhibit A-2**

**Duplicate Claims**

**Exhibit A-2**

**Claims Objections - Duplicate Claims**

	<b><u>Creditor Name</u></b>	<b><u>Claim to be Disallowed</u></b>	<b><u>Date Filed</u></b>	<b><u>Claim Amount</u></b>	<b><u>Debtor Name (For Claim to be disallowed)</u></b>	<b><u>Surviving Claim</u></b>	<b><u>Basis for Disallowance</u></b>
1.	Florida Power & Light Co.	151	7/10/2024	\$8,446.03	LaVie Care Centers, LLC	103	Claim to be Disallowed is duplicative of Surviving Claim.
2.	Vickie McHenry	1723	8/19/2024	\$35,000.00	LaVie Care Centers, LLC	3597	Claim to be Disallowed is duplicative of Surviving Claim.
3.	Vickie McHenry	4069	8/30/2024	\$35,000.00	LaVie Care Centers, LLC	3597	Claim to be Disallowed is duplicative of Surviving Claim.

**Exhibit A-3**

**No Liability Claims**

**Exhibit A-3**

**Claim Objections – No Liability Claims**

	<b><u>Claimant</u></b>	<b><u>Claim Number</u></b>	<b><u>Asserted Claim Amount</u></b>	<b><u>Debtor Identified</u></b>	<b><u>Reason for Disallowance</u></b>
1.	Atlanta Office Technologies	1391	\$394.22	Kings Daughters Facility Operations LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.
2.	Atlanta Office Technologies	1393	\$31.66	Augusta Facility Operations, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.
3.	Atlanta Office Technologies	1455	\$16.05	Hilltop Mississippi HealthCare, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.
4.	Atlanta Office Technologies	1458	\$60.66	Norfolk Facility Operations, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.
5.	Atlanta Office Technologies	1644	\$759.29	Ashland Facility Operations, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.

**Exhibit A-3**

	<u>Claimant</u>	<u>Claim Number</u>	<u>Asserted Claim Amount</u>	<u>Debtor Identified</u>	<u>Reason for Disallowance</u>
6.	HealthSpring Cigna Health and Life Insurance Company	2288	\$9,382.40	Oak Grove HealthCare, LLC	The contract underlying this Claim was assumed pursuant to the Plan, Confirmation Order and [DE 916]; therefore, this Claim was released and satisfied.
7.	LEAF Capital Funding, LLC	2895	\$70,928.45	Cardinal North Carolina HealthCare, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.
8.	LEAF Capital Funding, LLC	2950	\$70,917.76	Cary HealthCare, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.
9.	LEAF Capital Funding, LLC	2951	\$70,928.45	Cardinal North Carolina HealthCare, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.
10.	LEAF Capital Funding, LLC	2952	\$71,891.74	Forrest Oakes HealthCare, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.
11.	LEAF Capital Funding, LLC	2953	\$70,928.42	Grayson Facility Operations, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.

**Exhibit A-3**

	<u>Claimant</u>	<u>Claim Number</u>	<u>Asserted Claim Amount</u>	<u>Debtor Identified</u>	<u>Reason for Disallowance</u>
12.	LEAF Capital Funding, LLC	2954	\$71,892.07	Hunter Woods HealthCare, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.
13.	LEAF Capital Funding, LLC	2955	\$71,903.27	Kannapolis HealthCare, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.
14.	LEAF Capital Funding, LLC	2957	\$70,642.40	Locust Grove Facility Operations, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.
15.	LEAF Capital Funding, LLC	2959	\$70,642.40	Manor at St. Luke Village Facility Operations, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.
16.	LEAF Capital Funding, LLC	2960	\$71,511.38	McComb HealthCare, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.
17.	LEAF Capital Funding, LLC	2962	\$70,943.82	Newport News Facility Operations, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.

**Exhibit A-3**

	<u>Claimant</u>	<u>Claim Number</u>	<u>Asserted Claim Amount</u>	<u>Debtor Identified</u>	<u>Reason for Disallowance</u>
18.	LEAF Capital Funding, LLC	2964	\$70,939.81	Oak Grove HealthCare, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.
19.	LEAF Capital Funding, LLC	2965	\$71,340.59	Oaks at Sweeten Creek HealthCare, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.
20.	LEAF Capital Funding, LLC	2971	\$70,642.40	Pavilion at St. Luke Village Facility Operations, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.
21.	LEAF Capital Funding, LLC	2972	\$67,420.96	Pennknoll Village Facility Operations, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.
22.	LEAF Capital Funding, LLC	2973	\$69,918.78	Riley HealthCare LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.
23.	LEAF Capital Funding, LLC	2974	\$70,894.37	Skyline Facility Operations, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.

**Exhibit A-3**

	<u>Claimant</u>	<u>Claim Number</u>	<u>Asserted Claim Amount</u>	<u>Debtor Identified</u>	<u>Reason for Disallowance</u>
24.	LEAF Capital Funding, LLC	2975	\$68,885.46	Starkville Manor HealthCare, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.
25.	LEAF Capital Funding, LLC	2976	\$70,634.73	Valley View HealthCare, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.
26.	LEAF Capital Funding, LLC	2978	\$69,457.53	Wellington HealthCare, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.
27.	LEAF Capital Funding, LLC	3000	\$71,305.59	Westwood HealthCare, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.
28.	LEAF Capital Funding, LLC	3002	\$70,882.39	Willowbrook HealthCare, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.
29.	LEAF Capital Funding, LLC	3004	\$70,898.42	Windsor Facility Operations, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.

**Exhibit A-3**

	<u>Claimant</u>	<u>Claim Number</u>	<u>Asserted Claim Amount</u>	<u>Debtor Identified</u>	<u>Reason for Disallowance</u>
<b>30.</b>	LEAF Capital Funding, LLC	3007	\$68,755.77	Winona Manor HealthCare, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.
<b>31.</b>	LEAF Capital Funding, LLC	3009	\$3,244.97	Woodstock Facility Operations, LLC	The contract underlying this Claim was assumed pursuant to the Plan and Confirmation Order; therefore, this Claim was released and satisfied.