

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> , )	
)	(Jointly Administered)
Debtors. <sup>1</sup> )	
)	
_____ )	

**STIPULATION AND AGREED ORDER RELATED TO THE WITHDRAWAL  
OF THE AMERIHEALTH PROOFS OF CLAIM**

This stipulation and agreed order (this “Stipulation”) is made by and among the GUC Trustee,<sup>2</sup> AmeriHealth Caritas Health Plan d/b/a AmeriHealth Caritas Pennsylvania (“AmeriHealth,” and together with the GUC Trustee, collectively, the “Parties”), by and through

<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.veritaglobal.net/LaVie>. The location of LaVie Care Centers, LLC’s corporate headquarters and the Debtors’ service address is 1040 Crown Pointe Parkway, Suite 600, Atlanta, GA 30338.

<sup>2</sup> Capitalized terms used but not defined herein have the meanings ascribed to such terms in the Plan, as defined herein.



their respective undersigned counsel, regarding the withdrawal of the AmeriHealth Proofs of Claim (as defined herein).

**RECITALS**

**WHEREAS**, on June 2, 2024 and June 3, 2024, LaVie Care Centers, LLC and certain other of its affiliates (collectively, the “Debtors”) filed their respective voluntary petitions for bankruptcy relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) in the United States Bankruptcy Court for the Northern District of Georgia (Atlanta Division) (the “Court”);

**WHEREAS**, the Court on July 2, 2024 entered its *Order (I) Establishing Bar Dates for Filing Claims Against the Debtors; and (II) Granting Related Relief* [Docket No. 218];

**WHEREAS**, AmeriHealth thereafter timely filed those proofs of claim listed on **Exhibit “A”** hereto (the “AmeriHealth Proofs of Claim”), asserting against Debtors Locust Grove Facility Operations, LLC, Manor at St. Luke Village Facility Operations, LLC, Pavilion at St. Luke Village Facility Operations, LLC, Penn Village Facility Operations, LLC, and Pennknoll Village Facility Operations, LLC certain protective claims allegedly arising out of an *Ancillary Provider Services Agreement*, all as set forth in greater detail therein;

**WHEREAS**, the Court on December 5, 2024 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’ Modified Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* [Docket No. 730] (the “Plan”);

**WHEREAS**, the Effective Date of the Plan occurred on June 1, 2025, *see* [Docket No. 1016], and the GUC Trust was formed on that date;

**WHEREAS**, the Plan grants the GUC Trustee, who oversees and administers the GUC Trust, the authority to (among other things) reconcile and resolve claims of general unsecured creditors; and

**WHEREAS**, the Parties desire to effectuate the withdrawal of the AmeriHealth Proofs of Claim on the terms set forth herein.

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, AND UPON APPROVAL BY THE BANKRUPTCY COURT OF THIS STIPULATION, IT IS ORDERED AS FOLLOWS:**

1. The recitals set forth above are incorporated herein by reference as though fully set forth herein.
2. Upon endorsement by the Court of this Stipulation:
  - a. the AmeriHealth Proofs of Claim shall be deemed withdrawn and expunged in their entirety (the “Withdrawal”); and
  - b. the clerk of Court and the Debtors’ claims and noticing agent are hereby authorized and directed to reflect the Withdrawal on the docket and claims register for the above-captioned bankruptcy case.
3. The Parties are authorized and empowered to take all actions necessary to implement the relief provided by this Stipulation.
4. The terms and conditions of this Stipulation shall be immediately effective and enforceable upon entry by the Court.
5. This Stipulation may be executed in counterparts, including by facsimile or other electronic means, and each such counterpart together with the others shall constitute one and the same instrument.
6. This Stipulation shall be binding upon all successors and assigns of the Parties.

7. Each person who executes this Stipulation on behalf of a Party represents that he or she is duly authorized and has requisite authority to execute and deliver this Stipulation on behalf of such Party and to bind his or her respective Party to the terms and conditions of this Stipulation.

8. This Stipulation constitutes the entire agreement between the Parties with respect to the matters addressed herein and may not be modified except in a writing signed by the Parties. The Parties agree that each of them has had a full opportunity to participate in the drafting of this Stipulation and any claimed ambiguity shall be construed neither for nor against either of the Parties.

9. This Court hereby retains jurisdiction with respect to all matters arising from or related to the implementation of this Stipulation.

*[Signatures follow]*

IN WITNESS WHEREOF, the Parties have caused this Stipulation to be executed as of the day and year written below.

Dated: March 2, 2026

Prepared and Agreed to by:

PARKER, HUDSON, RAINER & DOBBS LLP

SAUL EWING LLP

By: /s/ Matthew G. Roberts

/s/ Steven C. Reingold

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*Counsel for AmeriHealth Caritas Health Plan  
d/b/a AmeriHealth Caritas Pennsylvania*

**Exhibit “A”**

AmeriHealth Proofs of Claim

	<b>Claimant</b>	<b>Debtor Name</b>	<b>Case No.</b>	<b>Filed Date</b>	<b>Claim No.</b>
1.	AmeriHealth Caritas Health Plan d/b/a AmeriHealth Caritas Pennsylvania	Locust Grove Facility Operations, LLC	24-55602	08/29/2024	3011
2.	AmeriHealth Caritas Health Plan d/b/a AmeriHealth Caritas Pennsylvania	Manor at St. Luke Village Facility Operations, LLC	24-55685	08/29/2024	3012
3.	AmeriHealth Caritas Health Plan d/b/a AmeriHealth Caritas Pennsylvania	Pavilion at St. Luke Village Facility Operations, LLC	24-55623	08/29/2024	3014
4.	AmeriHealth Caritas Health Plan d/b/a AmeriHealth Caritas Pennsylvania	Penn Village Facility Operations, LLC	24-55627	08/29/2024	3435
5.	AmeriHealth Caritas Health Plan d/b/a AmeriHealth Caritas Pennsylvania	Pennknoll Village Facility Operations, LLC	24-55631	08/29/2024	3444