

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

In re:)	
)	Chapter 11
LAVIE CARE CENTERS, LLC, <i>et al.</i> ¹)	Case No. 24-55507 (PMB)
)	
Debtors.)	(Jointly Administered)
)	
)	Related to Docket Nos. 104, 177, 273, 316, 317, 346, 347, 350

NOTICE OF CONTINUED DISCLOSURE STATEMENT HEARING

PLEASE TAKE NOTICE that, on June 2, 2024, LaVie Care Centers, LLC (“LaVie”) and certain of its affiliates and subsidiaries, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the “Debtors”) commenced the above-captioned chapter 11 cases (collectively, the “Chapter 11 Cases”) by filing petitions for relief under chapter 11 of the Bankruptcy Court in the United States Bankruptcy Court for the Northern District of Georgia, Atlanta Division (the “Court”).

PLEASE TAKE FURTHER NOTICE that, on July 23, 2024, the Debtors filed the *Debtors’ Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* [Docket No. 273] (the disclosure statement portion thereof, the “Disclosure Statement” and the chapter 11 plan portion thereof, the “Plan”, including all exhibits thereto and as amended, supplemented or otherwise modified from time to time, and collectively, as may be amended, supplemented, or otherwise modified, the “Combined Disclosure Statement and Plan”) with the Court.

PLEASE TAKE FURTHER NOTICE that, on August 7, 2024, the Debtors filed (i) their *Motion for Entry of Order (I) Approving Disclosure Statement, (II) Scheduling Confirmation Hearing, (III) Establishing Procedures for Solicitation and Tabulation of Votes on Plan, (IV) Approving Certain Forms and Notices, and (V) Granting Related Relief* [Docket No. 316] (the “Solicitation Procedures Motion”) with the Court, seeking, among other things, approval of the Disclosure Statement and various solicitation procedures with respect to soliciting votes to accept or reject the Combined Disclosure Statement and Plan; and (ii) the notice of hearing and objection deadline with respect to the Solicitation Procedures Motion [Docket No. 317], which set the deadline to object to adequacy of the Disclosure Statement and the relief requested in the Solicitation Procedures Motion as September 5, 2024 at 4:00 p.m. (prevailing Eastern Time) (the

¹ The last four digits of LaVie Care Centers, LLC’s federal tax identification number are 5592. There are 282 Debtors in these chapter 11 cases, which are being jointly administered for procedural purposes only. A complete list of the Debtors and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://www.veritaglobal.net/LaVie>. The location of LaVie Care Centers, LLC’s corporate headquarters and the Debtors’ service address is 1040 Crown Pointe Parkway, Suite 600, Atlanta, GA 30338.



“DS Objection Deadline”) and set the hearing on the Solicitation Procedures Motion and approval of the Disclosure Statement on September 11, 2024 at 9:30 a.m. (prevailing Eastern Time) (the “Disclosure Statement Hearing”).

PLEASE TAKE FURTHER NOTICE that, on August 26, 2024, the Debtors filed a *Joint Motion for Order Authorizing and Directing Mediation* [Docket No. 346], seeking appointment of the Honorable Jeffery W. Cavender as mediator and scheduling a mediation amongst the Debtors, the Official Committee of Unsecured Creditors, OHI DIP Lender, LLC, and TIX 33134 LLC (collectively, the “Parties”) on or around September 9-11, 2024 (the “Mediation”). The Court subsequently entered an order appointing Judge Cavender as mediator in the Chapter 11 Cases. See Docket No. 347. The Mediation occurred on September 9 and 11, 2024 and remains ongoing between the Parties.

PLEASE TAKE FURTHER NOTICE that, on August 26, 2024, the Debtors filed a *Notice of Continued Disclosure Statement Hearing and Sale Hearing* [Docket No. 350], which continued the Disclosure Statement Hearing until September 17, 2024 at 9:30 a.m. (prevailing Eastern Time).

PLEASE TAKE FURTHER NOTICE that, to allow additional time for the Parties to negotiate, the Disclosure Statement Hearing has been continued until **September 23, 2024 at 1:30 p.m. (prevailing Eastern Time)** at the **Richard B. Russell Federal Building and United States Courthouse in Courtroom 1202, 75 Ted Turner Dr. SW, Atlanta, Georgia 30303**, which may be attended in person or via the Court’s Virtual Hearing Room. You may join the Virtual Hearing Room through the “Dial-in and Virtual Bankruptcy Hearing Information” link at the top of the homepage of the Court’s website, www.ganb.uscourts.gov, or the link on the judge’s webpage, which can also be found on the Court’s website. Please also review the “Hearing Information” tab on the judge’s webpage for further information about the hearing. You should be prepared to appear at the hearing via video, but you may leave your camera in the off position until the Court instructs otherwise. Unrepresented persons who do not have video capability may use the telephone dial-in information on the judge’s webpage. Unless an extension has otherwise been discussed with the Debtors’ undersigned counsel, the DS Objection Deadline remains unchanged. **The hearing scheduled for September 17, 2024 at 9:30 a.m. (prevailing Eastern Time) will continue as a status hearing only.**

PLEASE TAKE FURTHER NOTICE THAT copies of the Combined Disclosure Statement and Plan, the Solicitation Procedures Motion, and other related documents are available free of charge on the Debtors’ case information website (<https://www.veritaglobal.net/lavie>) or can be requested from Kurtzman Carson Consultants, LLC d/b/a Verita by calling (877) 709-4750 (United States/Canada toll-free) or +1 (424) 236-7230 (International) or by clicking the “Submit an Inquiry” option at <https://www.veritaglobal.net/lavie/Inquiry>.

PLEASE TAKE FURTHER NOTICE THAT your rights may be affected. You should read the Solicitation Procedures Motion and the Combined Plan and Disclosure Statement carefully and discuss them with your attorney, if you have one in these bankruptcy cases. If you do not have an attorney, you may wish to consult one.

Dated: Atlanta, Georgia
September 13, 2024

MCDERMOTT WILL & EMERY LLP

/s/ Daniel M. Simon

Daniel M. Simon (Georgia Bar No. 690075)
1180 Peachtree St. NE, Suite 3350
Atlanta, Georgia 30309
Telephone: (404) 260-8535
Facsimile: (404) 393-5260
Email: dsimon@mwe.com

- and -

Emily C. Keil (admitted *pro hac vice*)
Jake Jumbeck (admitted *pro hac vice*)
Catherine Lee (admitted *pro hac vice*)
444 West Lake Street, Suite 4000
Chicago, Illinois 60606
Telephone: (312) 372-2000
Facsimile: (312) 984-7700
Email: ekeil@mwe.com
jjumbeck@mwe.com
clee@mwe.com

Counsel for the Debtors and Debtors-in-Possession

CERTIFICATE OF SERVICE

I hereby certify that on September 13, 2024, all ECF participants registered in this case were served electronically with the foregoing notice through the Court’s ECF system at their respective email addresses registered with this Court. The Debtors’ claims and noticing agent will be filing a supplemental certificate of service on the docket to reflect any additional service of the foregoing notice, including on the Limited Service List.

Dated: Atlanta, Georgia
September 13, 2024

MCDERMOTT WILL & EMERY LLP

/s/ Daniel M. Simon
Daniel M. Simon (Georgia Bar No. 690075)
1180 Peachtree St. NE, Suite 3350
Atlanta, Georgia 30309
Telephone: (404) 260-8535
Facsimile: (404) 393-5260
Email: dsimon@mwe.com

Counsel for the Debtors and Debtors-in-Possession