UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

IN RE:)	CHAPTER 11
LAVIE CARE CENTERS, LLC, et al.)	CASE NO. 24-55507-pmb
Debtors.)	JOINTLY ADMINISTERED

MOTION TO ALLOW ELECTRONIC EQUIPMENT IN THE COURTROOM

COME NOW OHI DIP Lender, LLC, OHI Mezz Lender, LLC, and various related landlord parties (collectively, the "Omega Parties"), a DIP Lender, creditors, and landlords in the above-captioned Chapter 11 cases (the "Chapter 11 Cases"), and hereby submit this motion for the entry of an order, substantially in the form attached hereto as Exhibit A (the "Proposed Order"), seeking entry of an order authorizing their counsel, Leighton Aiken of Ferguson Braswell Fraser Kubasta PC, Robert J. Lemons of Goodwin Procter LLP, and Yelizaveta L. Burton of Goodwin Procter LLP (all having been admitted *pro hac vice* in the Chapter 11 Cases), to bring electronic equipment into the courtroom for use during hearings in the Chapter 11 Cases before the Honorable Judge Paul M. Baisier. Specifically, the Omega Parties request that each such attorney be allowed to bring in one cell phone and one laptop or tablet computer. The Omega Parties respectfully request that this authorization begin on Thursday, June 27, 2024 and continue until completion of the Chapter 11 Cases.

WHEREFORE, the Omega Parties respectfully request entry of the Proposed Order (a) granting the relief requested herein, and (b) granting such other relief as is just and proper.

This 17th day of June, 2024.

SCROGGINS & WILLIAMSON, P.C.

By: <u>/s/ Matthew W. Levin</u>
MATTHEW W. LEVIN
Georgia Bar No. 448270

4401 Northside Parkway Suite 450 Atlanta, Georgia 30327 T: (404) 893-3880 F: (404) 893-3886 E: mlevin@swlawfirm.com

and

Leighton Aiken (admitted pro hac vice)
Texas Bar No. 00944200
FERGUSON BRASWELL FRASER
KUBASTA PC
2500 Dallas Parkway, Suite 600
Plano, Texas 75093
T: (972) 378-9111
E: laiken@fbfk.law

Robert J. Lemons (admitted pro hac vice)
New York Bar No. 3892734
Yelizaveta L. Burton (admitted pro hac vice)
New York Bar No. 5411681
GOODWIN PROCTER LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018
T: (212) 813-8800
E: rlemons@goodwinlaw.com
lburton@goodwinlaw.com

Counsel for the Omega Parties

EXHIBIT A

Proposed Order

UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

IN RE:)	CHAPTER 11
LAVIE CARE CENTERS, LLC, et al.)	CASE NO. 24-55507-pmb
Debtors.)	JOINTLY ADMINISTERED
)	

ORDER AUTHORIZING USE OF ELECTRONIC EQUIPMENT

Upon the motion (the "Motion")¹ of OHI DIP Lender, LLC, OHI Mezz Lender, LLC, and various related landlord parties (collectively, the "Omega Parties"), a DIP Lender, creditors, and landlords in the above-captioned Chapter 11 cases (the "Chapter 11 Cases"), to allow their representatives to bring electronic equipment into the courtroom in these cases, it is hereby

ORDERED that counsel for the Omega Parties, **Leighton Aiken** of Ferguson Braswell Fraser Kubasta PC, **Robert J. Lemons** of Goodwin Procter LLP, and **Yelizaveta L. Burton** of

¹ Capitalized terms used herein but not otherwise defined shall have the meanings ascribed to them in the Motion.

Case 24-55507-pmb Doc 122 Filed 06/17/24 Entered 06/17/24 14:17:04 Desc Main Page 5 of 8 Document

Goodwin Procter LLP (all having been admitted pro hac vice in the Chapter 11 Cases), may each

bring one (1) cell phone and one (1) laptop or tablet computer to either or both of (a) Courtroom

1202, the Richard B. Russell Federal Building & U.S. Courthouse, 75 Ted Turner Drive, SW

Atlanta, Georgia 30303; and (b) the 2nd Floor Courtroom, the Lewis R. Morgan Federal Building

and United States Courthouse, 18 Greenville Street, Newnan, Georgia 30263, in conjunction with

the hearings in the Chapter 11 Cases before the Honorable Judge Paul M. Baisier, beginning on

Thursday, June 27, 2024 and continuing until completion of the Chapter 11 Cases. The telephone

contact number is (404) 215-1010. Said equipment shall be subject to inspection. Proper

identification will be required upon entering the security station at the courthouse.

The Clerk is directed to serve a copy of this Order upon counsel for the Debtors, counsel

for the Omega Parties, the United States Trustee, and the United States Marshal's Office.

END OF DOCUMENT

Prepared and presented by:

SCROGGINS & WILLIAMSON, P.C.

By: /s/ Matthew W. Levin

MATTHEW W. LEVIN Georgia Bar No. 448270

4401 Northside Parkway

Suite 450

Atlanta, Georgia 30327

T: (404) 893-3880

F: (404) 893-3886

E: mlevin@swlawfirm.com

and

Leighton Aiken (admitted *pro hac vice*)

Texas Bar No. 00944200

FERGUSON BRASWELL FRASER KUBASTA PC

2500 Dallas Parkway, Suite 600

- 2 -

Plano, Texas 75093 T: (972) 378-9111 E: laiken@fbfk.law

Robert J. Lemons (admitted *pro hac vice*)
New York Bar No. 3892734
Yelizaveta L. Burton (admitted *pro hac vice*)
New York Bar No. 5411681
GOODWIN PROCTER LLP
The New York Times Building
620 Eighth Avenue
New York, NY 10018
T: (212) 813-8800
E: rlemons@goodwinlaw.com
lburton@goodwinlaw.com

Counsel for the Omega Parties

DISTRIBUTION LIST

Daniel M. Simon MCDERMOTT WILL & EMERY LLP 1180 Peachtree Street NE, Suite 3350 Atlanta, GA 30309

Matthew W. Levin SCROGGINS & WILLIAMSON, P.C. 4401 Northside Parkway, Suite 450 Atlanta, GA 30327

Jonathan S. Adams
OFFICE OF THE UNITED STATES TRUSTEE
362 Richard Russell Building
75 Ted Turner Drive, SW
Atlanta, GA 30303

UNITED STATES MARSHALS SERVICE Richard B. Russell Federal Building and Courthouse 75 Ted Turner Drive SW, Suite 1600 Atlanta, GA 30303

CERTIFICATE OF SERVICE

This is to certify that I have on this day electronically filed the foregoing Motion to Allow Electronic Equipment in the Courtroom using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to all parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program.

This 17th day of June, 2024.

SCROGGINS & WILLIAMSON, P.C.

By: <u>/s/ Matthew W. Levin</u>
MATTHEW W. LEVIN
Georgia Bar No. 448270

4401 Northside Parkway Suite 450 Atlanta, GA 30327

T: (404) 893-3880 F: (404) 893-3886

E: mlevin@swlawfirm.com

Counsel for the Omega Parties