

RELIEF REQUESTED

1. By the Application, the Debtors respectfully request entry of the Proposed Order, authorizing the Debtors, on behalf of and at the sole direction of Mr. James D. Decker, as independent manager (the “Independent Manager”) of Debtor LV Operations I, LLC, to (a) retain and employ Chapman and Cutler LLP (“Chapman”) as special counsel in these Chapter 11 Cases (as defined below), effective as of the Petition Date (as defined below) and (b) granting related relief.

JURISDICTION AND VENUE

2. The Court has jurisdiction to consider the Application 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 Application in this District is proper under 28 U.S.C. §§ 1408 and 1409.

3. The legal predicates for the relief requested herein are sections 327(e) of title 11 of the United States Code (the “Bankruptcy Code”), Rule 2014(a) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and the *Second Amended and Restated General Order 26-2019, Procedures for Complex Chapter 11 Cases*, dated February 6, 2023 (the “Complex Case Procedures”).

BACKGROUND

I. The Chapter 11 Cases

4. On June 2, 2024 (the “Petition Date”), each Debtor commenced a case by filing a petition for relief under chapter 11 of the Bankruptcy Code (collectively, the “Chapter 11 Cases”) in the United States Bankruptcy Court for the Northern District of Georgia, Atlanta Division (the “Court”). The Debtors continue to operate their businesses and manage their properties as debtors and debtors-in-possession pursuant to Bankruptcy Code sections 1107(a) and 1108.

5. On June 13, 2024, the Office of the United States Trustee for Region 21 (the “U.S. Trustee”) appointed an official committee in the Chapter 11 Cases (the “Committee”). *See Appointment and Notice of Appointment of Committee of Creditors Holding Unsecured Claims* [Docket No. 112]. To date, no trustee or examiner has been appointed in these Chapter 11 Cases.

6. Additional information regarding the Debtors and these Chapter 11 Cases, including the Debtors’ business operations, capital structure, financial condition, and the reasons for and objectives of these Chapter 11 Cases, is set forth in the *Declaration of M. Benjamin Jones in Support of Chapter 11 Petitions and First Day Pleadings* [Docket No. 17] (the “First Day Declaration”).

II. Chapman’s Qualifications

7. Chapman is well qualified to serve as special counsel to the Debtors in these Chapter 11 Cases pursuant to Bankruptcy Code section 327(e). Chapman is a professional services firm of over 250 attorneys with offices in New York, Chicago, Washington, D.C., Charlotte, San Francisco, and Salt Lake City. It represents hundreds of clients in a variety of industries and has significant experience in many areas of the law and has a dedicated practice of bankruptcy and restructuring that includes substantial history of representing debtors, by and through independent board members.

8. Chapman has already gained familiarity with the Debtors’ business through its prepetition engagement with the Independent Manager and have worked closely with Debtors’ proposed counsel to date. Accordingly, Chapman already has substantial knowledge regarding the Debtors’ businesses and the various issues facing the Debtors.

SERVICES TO BE PROVIDED BY CHAPMAN

9. The employment of Chapman as special counsel to the Debtors, by and through the

Independent Manager, pursuant to the terms of this Application and that certain supplemental engagement letter dated May 24, 2024 (the “Engagement Letter”),² a copy of which is attached hereto as Exhibit C, is appropriate and necessary to represent the Debtors through these Chapter 11 Cases. In particular, Chapman will be engaged for the purpose of providing legal counsel to the Independent Manager, as independent fiduciary of each of the Debtors, including by providing advice and representation regarding any estate claims and causes of action that may be available to the Debtors. To the extent any such claims or causes of action are proposed to be settled or released in connection with any potential sale under Bankruptcy Code section 363 or a chapter 11 plan, Chapman will provide legal advice to the Independent Manager concerning the appropriateness and reasonableness of such releases in connection therewith. In addition, Chapman will provide any such other services determined by the Independent Manager to be appropriate under the circumstances.

10. As indicated above, Chapman has obtained valuable institutional knowledge of the Debtors’ businesses and financial affairs as a result of its representation of the Independent Manager prior to the Petition Date. The Independent Manager began his analysis of estate claims and causes of action prior to the Petition Date, including without limitation: (a) reviewing and analyzing historical transactions and documents relating thereto; (b) analyzing potential claims held by the Debtors; (c) conducting certain informal interviews; and (d) advising the Independent Manager in connection with certain matters, including the determination to commence these Chapter 11 Cases. Accordingly, the Debtors respectfully submit that Chapman is well qualified

² The Engagement Letter supplements that certain engagement letter entered into by Chapman and the Independent Manager on February 4, 2020 on matters unrelated to the Chapter 11 Cases.

to perform these services and represent the Debtors, by and through the Independent Manager, in these Chapter 11 Cases.

11. Moreover, contemporaneously herewith, the Debtors are filing an application to retain McDermott Will and Emery LLP ("McDermott") as primary restructuring counsel to the Debtors. The services of Chapman shall complement, and not duplicate, the services to be rendered by McDermott. Chapman shall act on its own and will not act under the direct supervision of McDermott. Indeed, the Independent Manager is mindful of the need to avoid duplication of services and appropriate procedures will be implemented to ensure that there is no such duplication. In addition, although not foreseen at the time of this Application, to the extent McDermott has a potential or actual conflict in any part of its representation of the Debtors, Chapman may be able to provide counsel to the Debtors in such circumstances at the sole discretion of the Independent Manager.

COMPENSATION AND FEE APPLICATIONS

12. Subject to Court approval, Chapman intends to: (a) charge for its legal services on an hourly basis in accordance with its ordinary and customary hourly rates in effect on the date services are rendered; and (b) seek reimbursement of actual and necessary out-of-pocket expenses. The current rates for Chapman bankruptcy and restructuring attorneys presently range from \$725 to \$1,450 per hour, and the current rates for paralegals vary from \$365 to \$485 per hour. Such hourly rates may change from time to time in accordance with Chapman's established billing practices and procedures. Chapman's hourly fees are comparable to those charged by attorneys of similar experience and expertise for engagements of scope and complexity similar to these chapter 11 cases and are, therefore, reasonable.

13. Chapman intends to maintain detailed, contemporaneous time records and apply to the Court for payment of compensation and reimbursement of expenses in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules, the Complex Case Procedures, and any additional procedures that may be established by the Court in these Chapter 11 Cases. Chapman has agreed to accept as compensation such sums as may be allowed by the Court. Chapman understands that fee awards are subject to approval by this Court.

BASIS FOR RELIEF REQUESTED AND APPLICABLE AUTHORITY

14. Bankruptcy Code section 327(e) provides as follows:

The trustee, with the court's approval, may employ, for a specific special purpose, other than to represent the trustee in conducting the case, an attorney that has represented the debtor, if in the best interest of the estate, and if such attorney does not represent or hold any interest adverse to the debtor or to the estate with respect to the matter on which such attorney is to be employed.

11 U.S.C. § 327(e).

15. The proposed employment of Chapman is in the best interest of the Debtors' estates. Through its prepetition representation of the Debtors, by and through the Independent Manager, Chapman is familiar with the facts and history of the Debtors' general business and other corporate matters. As such, Chapman has extensive knowledge of and experience with the Debtors' business, as well as the laws and regulations pertaining to such business, and substantial knowledge of and experience in ongoing legal matters involving the Debtors. Accordingly, Chapman is uniquely suited to provide the legal services set forth above in an efficient and cost-effective manner.

DISCLOSURES REGARDING LACK OF ADVERSE INTERESTS

16. In reliance on the Halperin Declaration and subject to the disclosures made therein, the Debtors believe that Chapman does not represent an interest materially adverse to the interests

of the Debtors or their respective estates or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with or interest in, the Debtors or for any other reason as required by Bankruptcy Code section 327(e).

NOTICE

17. The Debtors will provide notice of the Application to: (a) the U.S. Trustee; (b) the Internal Revenue Service; (c) the United States Attorney for the Northern District of Georgia; (d) the Attorney General for the State of Georgia; (e) the Georgia Department of Revenue; (f) the Centers for Medicare and Medicaid Services; (g) the states attorneys general for states in which the Debtors conduct business; (h) proposed counsel to the Committee; (i) counsel to the Debtors' prepetition lenders; (j) counsel to the DIP Lenders; and (l) all parties entitled to notice pursuant to Rule 2002 of the Federal Rules of Bankruptcy Procedure. The Debtors submit that no other or further notice is required.

NO PRIOR REQUEST

14. No prior request for the relief sought in this Application has been made to this or any other Court.

[Remainder of page intentionally left blank]

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order, substantially in the form attached hereto as **Exhibit A**, granting the relief requested herein and such other and further relief as may be just and proper.

Dated: June 25, 2024



James D. Decker
Independent Manager,
LV Operations I, LLC, on behalf of each of its
direct and indirect subsidiaries, as Debtors-In-
Possession in these Chapter 11 Cases

CERTIFICATE OF SERVICE

I hereby certify that on this date a true and correct copy of the foregoing Application was served by the Court's CM/ECF system on all counsel of record registered in these Chapter 11 Cases through CM/ECF. The Debtors' claims and noticing agent, Kurtzman Carson Consultants LLC, will be filing a supplemental certificate of service on the docket to reflect any additional service, including on the Limited Service List.

Dated: Atlanta, Georgia
June 25, 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

*Proposed Counsel for the Debtors and
Debtors-in-Possession*

EXHIBIT A

Proposed Order

**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) |
| |) | |

**ORDER AUTHORIZING DEBTORS, BY AND THROUGH THE INDEPENDENT
MANAGER, TO (I) RETAIN AND EMPLOY CHAPMAN AND CUTLER LLP AS
SPECIAL COUNSEL EFFECTIVE AS OF THE PETITION DATE
AND (II) GRANTING RELATED RELIEF**

Upon the application (the “Application”)² of the Debtors for entry of an order (this “Order”) for authorization to retain Chapman and Culter LLP (“Chapman”) as special counsel

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.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.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Application.

to the Debtors, by and through the Independent Manager (as described in the Application), effective as of the Petition Date on the terms set forth in the Engagement Letter, all as more fully set forth in the Application; and the Court being satisfied that Chapman has the capability and experience to provide the services described in the Application, Chapman does not hold or represent an interest adverse to the Debtors or their estates related to any matter for which Chapman will be employed, and Chapman is a “disinterested person” as defined in Bankruptcy Code section 101(14); and upon the Halperin Declaration; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Second Amended and Restated General Order 26-2019, Procedures for Complex Chapter 11 Cases*, dated February 6, 2023 (the “Complex Case Procedures”); and the matter being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and venue of this proceeding and the Application in this District being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court being able to issue a final order consistent with Article III of the United States Constitution; and due and sufficient notice of the opportunity to object to and for hearing on the Motion having been given under the particular circumstances pursuant to the *Third Amended and Restated General Order No. 24-2018*; and no hearing is necessary on the Application absent the filing of an objection with respect to the same; and it appearing that no other or further notice is necessary; and it appearing that the relief requested in the Application is in the best interests of the Debtors, their estates, their creditors, and other parties-in-interest; and after due deliberation thereon; and good and sufficient cause appearing therefor; it is hereby

ORDERED, ADJUDGED, AND DECREED that:

1. The Application is granted as set forth herein.
2. Pursuant to 28 U.S.C. §157(b), Bankruptcy Code section 327(e), and Bankruptcy Rule 2014(a), the Debtors, on behalf of and at the sole direction of the Independent Manager, are

authorized to employ Chapman as special counsel pursuant to Bankruptcy Code section 327(e), effective as of the Petition Date, to provide the services set forth in the Application and the Engagement Letter.

3. The terms of the Engagement Letter, including without limitation, the compensation and expense reimbursement provisions, are reasonable terms and conditions of employment and are hereby approved.

4. Chapman is authorized to take any action necessary to comply with its duties as set forth in this Order.

5. Chapman shall comply with all requests of the Clerk of this Court.

6. Chapman will maintain detailed, contemporaneous time records of its services performed.

7. Chapman will apply to the Court for payment of compensation and reimbursement of expenses in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules, the Complex Case Procedures, and any additional procedures that may be established by the Court in these Chapter 11 Cases.

8. To the extent there is inconsistency between the terms of the Engagement Letter, the Application, and this Order, the terms of this Order shall govern.

9. Any party-in-interest shall have 21 days from the service of this Order to file an objection to the Application and/or the relief provided in this Order.

10. If an objection is timely filed, proposed counsel for the Debtors will set the Application and all such objections for hearing pursuant to the Court's Open Calendar Procedures.

11. If no objection to this Order is timely filed, this Order shall be a final Order approving the Application.

12. The Debtors and Chapman are authorized to take all actions necessary to implement the relief granted in this Order.

13. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

14. Proposed counsel for the Debtors, through Kurtzman Carson Consultants LLC (“KCC”), shall, within three business days of the entry of this Order, cause a copy of this Order to be served by first class mail, postage prepaid, on all parties served with the Application, and KCC shall file promptly thereafter a certificate of service confirming such service.

END OF ORDER

Prepared and presented by:

/s/ Daniel M. Simon

Daniel M. Simon (Georgia Bar No. 690075)

MCDERMOTT WILL & EMERY LLP

1180 Peachtree Street 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*)

MCDERMOTT WILL & EMERY LLP

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

Proposed Counsel for the Debtors and Debtors-in-Possession

Distribution List

LaVie Care Centers, LLC
c/o Ankura Consulting Group, LLC,
485 Lexington Avenue, 10th Floor,
New York, NY 10017
Attn: M. Benjamin Jones

Daniel M. Simon
McDermott Will & Emery LLP
1180 Peachtree Street NE, Suite 3350
Atlanta, GA 30309

Emily C. Keil
McDermott Will & Emery LLP
444 West Lake Street, Suite 4000
Chicago, IL 60606

Kurtzman Carson Consultants LLC
222 N. Pacific Coast Highway, 3rd Floor
El Segundo, CA 90245

Jonathan S. Adams
Office of the United States Trustee
362 Richard Russell Federal Building
75 Ted Turner Drive, SW
Atlanta, GA 30303

EXHIBIT B

Halperin Declaration

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) |
| |) | |

DECLARATION OF LARRY HALPERIN IN SUPPORT OF DEBTORS’ APPLICATION FOR ENTRY OF ORDER AUTHORIZING DEBTORS, BY AND THROUGH THE INDEPENDENT MANAGER, TO (I) RETAIN AND EMPLOY CHAPMAN AND CUTLER LLP AS SPECIAL COUNSEL EFFECTIVE AS OF THE PETITION DATE AND (II) GRANTING RELATED RELIEF

I, Larry Halperin, being duly sworn, state the following under penalty of perjury and that the following is true and correct to the best of my knowledge, information, and belief:

1. I am an attorney at law admitted and in good standing to practice in the State of New York.

2. I am a partner of the law firm of Chapman and Cutler LLP (“Chapman”) and am duly authorized to make this Declaration on behalf of Chapman. I make this Declaration in support of the *Debtors’ Application for Entry of Order Authorizing Debtors, By and Through The Independent Manager, to (I) Retain and Employ Chapman and Cutler LLP as Special Counsel Effective as of the Petition Date and (II) Granting Related Relief* (the “Application”).² The facts

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.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.

² Capitalized terms not otherwise defined herein have the meanings given to them in the Application.

set forth in this Declaration are personally known to me and, if called as a witness, I could and would testify thereto.

CHAPMAN'S QUALIFICATIONS

3. Chapman's bankruptcy and restructuring practice group consists of over 25 attorneys practicing in its New York and Chicago offices. Chapman's restructuring professionals have played significant roles in a wide array of chapter 11 cases. In addition, I, and a number of my partners, also routinely represent debtors, by and through independent managers, in a wide variety of workout and restructuring situations.

4. Chapman is also familiar with the Debtors' business, having represented the Independent Manager prior to the Petition Date. Accordingly, Chapman has developed substantial knowledge regarding the Debtors that will result in effective and efficient representation of the Debtors in the narrow capacity as set forth in the Application.

SERVICES TO BE PROVIDED BY CHAPMAN

5. The employment of Chapman as special counsel to the Debtors, by and through the Independent Manager, pursuant to the terms of this Application and that certain supplemental engagement letter dated May 24, 2024 (the "Engagement Letter"),³ a copy of which is attached to the Application as Exhibit C, is appropriate and necessary to represent the Debtors through these Chapter 11 Cases. In particular, Chapman will be engaged for the purpose of providing legal counsel to the Independent Manager, as independent fiduciary of each of the Debtors, including by providing advice and representation regarding any estate claims and causes of action that may be available to the Debtors. To the extent any such claims or causes of action are proposed to be

³ The Engagement Letter supplements that certain engagement letter entered into by Chapman and the Independent Manager on February 4, 2020 on matters unrelated to the Chapter 11 Cases.

settled or released in connection with any potential sale under Bankruptcy Code section 363 or a chapter 11 plan, Chapman will provide legal advice to the Independent Manager concerning the appropriateness and reasonableness of such releases in connection therewith. In addition, Chapman will provide any such other services determined by the Independent Manager to be appropriate under the circumstances.

6. As indicated above, Chapman has obtained valuable institutional knowledge of the Debtors' businesses and financial affairs as a result of its representation of the Independent Manager prior to the Petition Date. The Independent Manager began his analysis of estate claims and causes of action prior to the Petition Date, including without limitation: (a) reviewing and analyzing historical transactions and documents relating thereto; (b) analyzing potential claims held by the Debtors; (c) conducting certain informal interviews; and (d) advising the Independent Manager in connection with certain matters, including the determination to commence these Chapter 11 Cases. Accordingly, the Debtors respectfully submit that Chapman is well qualified to perform these services and represent the Debtors, by and through the Independent Manager, in these Chapter 11 Cases.

7. Moreover, contemporaneously herewith, the Debtors are filing an application to retain McDermott Will and Emery LLP ("McDermott") as primary restructuring counsel to the Debtors. The services of Chapman shall complement, and not duplicate, the services to be rendered by McDermott. Chapman shall act on its own and will not act under the direct supervision of McDermott. Indeed, the Independent Manager is mindful of the need to avoid duplication of services and appropriate procedures will be implemented to ensure that there is no such duplication. In addition, although not foreseen at the time of this Application, to the extent McDermott has a potential or actual conflict in any part of its representation of the Debtors,

Chapman may be able to provide counsel to the Debtors in such circumstances at the sole discretion of the Independent Manager.

COMPENSATION AND FEE APPLICATIONS

8. Subject to Court approval, Chapman intends to: (a) charge for its legal services on an hourly basis in accordance with its ordinary and customary hourly rates in effect on the date services are rendered; and (b) seek reimbursement of actual and necessary out-of-pocket expenses. The current rates for Chapman bankruptcy and restructuring attorneys presently vary from \$725 to \$1,450 per hour, and the current rates for paralegals vary from \$365 to \$485 per hour. My hourly billing rate is currently \$1,450 per hour. Such hourly rates may change from time to time in accordance with Chapman's established billing practices and procedures. Chapman's hourly fees are comparable to those charged by other attorneys of similar experience and expertise for similar engagements and are, therefore, reasonable.

9. Chapman intends to maintain detailed, contemporaneous time records and apply to the Court for payment of compensation and reimbursement of expenses in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Bankruptcy Rules, and any additional procedures that may be established by the Court in these chapter 11 cases. Chapman has agreed to accept as compensation such sums as may be allowed by the Court. Chapman understands that fee awards are subject to approval by this Court.

DISCLOSURES CONCERNING LACK OF ADVERSE INTERESTS

10. In advance of filing the Application, proposed counsel to the Debtors provided Chapman with an extensive list interested parties and significant creditors (collectively, the "Potential Interested Parties") in the following categories:

- (a) the Debtors;
- (b) non-Debtor affiliates;

- (c) certain of the Debtors' current and former officers;
- (d) the Debtors' secured lenders;
- (e) the Debtors' DIP lenders;
- (f) chapter 11 professionals;
- (g) Unsecured Creditors' Committee;
- (h) the Debtors' banks;
- (i) landlords of the Debtors;
- (j) utility providers to the Debtors;
- (k) taxing authorities;
- (l) Debtors' employee benefit providers;
- (m) Debtors' insurance carriers;
- (n) the Debtors' top 50 trade creditors;
- (o) employment agencies to the Debtors;
- (p) unions;
- (q) governmental authorities and judicial authorities and personnel; and
- (r) certain other professionals associated with these chapter 11 cases.

11. The list of Potential Interested Parties is set forth on **Schedule 1** attached hereto. To check and clear potential conflicts of interest in these Chapter 11 Cases, as well as to determine all "connections" (as such term is used in Bankruptcy Rule 2014) to the Debtors, their creditors, other parties in interest, their respective attorneys and accountants, the U.S. Trustee, or any person employed by the U.S. Trustee, Chapman researched its client database for the past two years to determine whether it had any relationships with the Potential Interested Parties. To the extent that Chapman's research of its relationships with the Potential Interested Parties indicates that Chapman has represented in the past two years, or currently represents, any of these entities, the

identities of these entities and such entities' relationship to the Debtors and connection to Chapman, are set forth in **Schedule 2** attached hereto.

12. To the best of my knowledge and belief, insofar as I have been able to ascertain after reasonable inquiry, neither I, nor Chapman, nor any partner or associate thereof, has any connection with the Debtors, their creditors, the U.S. Trustee or any other parties with an actual or potential interest in these Chapter 11 Cases or their respective attorneys or accountants, except as set forth below and in **Schedule 2** attached hereto:

(a) Chapman currently represents, formerly represented or may in the future represent certain of the Interested Parties or other entities that are or may be: (i) creditors in these cases; (ii) parties to executory contracts and unexpired leases with the Debtors; (iii) clients of the Debtors; or (iv) otherwise directly or indirectly affiliated with creditors or other parties in interest in these cases. As described above, Chapman has undertaken a detailed search to determine whether it represents, or has represented in the last two years, any of the Interested Parties, and the identities of such entities and such entities' relationship to the Debtors and connection to Chapman is set forth in Schedule 2 hereto. Chapman, however, does not and will not represent any of the Interested Parties identified on Schedule 2 in matters relating to the Debtors or their chapter 11 cases.

(b) Chapman is a large firm with over 250 attorneys and employees and with offices in several states. It is possible that certain Chapman attorneys or employees hold interests in mutual funds or other investment vehicles that may own, directly or indirectly, the Debtors' securities.

13. To the best of my knowledge and belief, insofar as I have been able to ascertain after reasonable inquiry, neither I, nor Chapman, nor any partner or associate thereof, has or represents an interest materially adverse to the interests of the Debtors or their respective estates or any class of creditors, by reason of any direct or indirect relationship to, connection with or interest in, the Debtors or for any other reason as required by Bankruptcy Code section 327(e).

14. Despite the efforts described above to identify and disclose connections with parties in interest in these cases, because the Debtors are a large enterprise with many creditors and other relationships, and because Chapman is a large firm with offices in several states, Chapman is

unable to state with certainty that every client connection of Chapman has been disclosed. In this regard, if Chapman discovers additional information that requires disclosure, Chapman will file supplemental disclosures with this Court.

COMPENSATION AND FEE APPLICATIONS

15. To the best of my knowledge and belief, insofar as I have been able to ascertain after reasonable inquiry, neither I nor Chapman, nor any partner or associate thereof, has received or been promised any compensation for legal services rendered or to be rendered in any capacity in connection with the Chapter 11 Cases, other than as permitted by the Bankruptcy Code. Chapman has not agreed to share compensation received in connection with these Chapter 11 Cases with any other person, except as permitted by section 504(b) of the Bankruptcy Code and Bankruptcy Rule 2016(b) in respect of the sharing of compensation among Chapman's partners.

Dated: June 25, 2024
New York, New York

CHAPMAN AND CUTLER LLP

By: 

Larry Halperin
Joseph P. Lombardo
1270 Avenue of the Americas
30th Floor
New York, NY 10020-1708
Telephone: 212.655.6000

*Proposed Special Counsel to Debtors and
Debtors-in-Possession*

Schedule 1

Potential Parties in Interest List

Debtors

LaVie Care Centers, LLC
10040 Hillview Road Operations LLC (d/b/a University Hills Health and Rehabilitation)
1010 Carpenters Way Operations LLC (d/b/a Wedgewood Healthcare Center)
1026 Albee Farm Road Operations LLC (d/b/a Bay Breeze Health and Rehabilitation Center)
1061 Virginia Street Operations LLC (d/b/a Lakeside Oaks Care Center)
1111 Drury Lane Operations LLC (d/b/a Englewood Healthcare and Rehabilitation Center)
1120 West Donegan Avenue Operations LLC (d/b/a Keystone Rehabilitation and Health Center)
11565 Harts Road Operations LLC (d/b/a Harts Harbor Health Care Center)
12170 Cortez Boulevard Operations LLC (d/b/a Spring Hill Health and Rehabilitation Center)
125 Alma Boulevard Operations LLC (d/b/a Island Health and Rehabilitation Center)
1445 Howell Avenue Operations LLC (d/b/a Heron Pointe Health and Rehabilitation Center)
1465 Oakfield Drive Operations LLC (d/b/a Brandon Health and Rehabilitation Center)
1507 South Tuttle Avenue Operations LLC (d/b/a Magnolia Health and Rehabilitation Center)
15204 West Colonial Drive Operations LLC (d/b/a Colonial Lakes Health Care)
1550 Jess Parrish Court Operations LLC (d/b/a Vista Manor)
1615 Miami Road Operations LLC (d/b/a Harbor Beach Nursing and Rehabilitation Center)
1820 Shore Drive Operations LLC (d/b/a Health and Rehabilitation Centre at Dolphins View, The)
1851 Elkcam Boulevard Operations LLC (d/b/a Deltona Health Care)

1937 Jenks Avenue Operations LLC (d/b/a Sea Breeze Health Care)
195 Mattie M. Kelly Boulevard Operations LLC (d/b/a Destin Healthcare and Rehabilitation Center)
216 Santa Barbara Boulevard Operations LLC (d/b/a Coral Trace Health Care)
2333 North Brentwood Circle Operations LLC (d/b/a Health Center at Brentwood)
2401 NE 2nd Street Operations LLC (d/b/a SeaView Nursing and Rehabilitation Center)
2826 Cleveland Avenue Operations LLC (d/b/a Heritage Park Rehabilitation and Healthcare)
2916 Habana Way Operations LLC (d/b/a Habana Health Care Center)
2939 South Haverhill Road Operations LLC (d/b/a Coral Bay Healthcare and Rehabilitation)
3001 Palm Coast Parkway Operations, LLC (d/b/a Grand Oaks Health and Rehabilitation Center)
3101 Ginger Drive Operations LLC (d/b/a Heritage Healthcare Center at Tallahassee)
3110 Oakbridge Boulevard Operations LLC (d/b/a Oakbridge Healthcare Center)
3735 Evans Avenue Operations LLC (d/b/a Evans Health Care)
3825 Countryside Boulevard Operations LLC (d/b/a Countryside Rehab and Healthcare Center)
3920 Rosewood Way Operations LLC (d/b/a Rosewood Health and Rehabilitation Center)
4200 Washington Street Operations LLC (d/b/a Hillcrest Health Care and Rehabilitation Center)
4641 Old Canoe Creek Road Operations LLC (d/b/a Plantation Bay Rehabilitation Center)
500 South Hospital Drive Operations LLC (d/b/a Shoal Creek Rehabilitation Center)
5065 Wallis Road Operations LLC (d/b/a Renaissance Health and Rehabilitation)

518 West Fletcher Avenue Operations LLC
(d/b/a Fletcher Health and Rehabilitation
Center)
5405 Babcock Street Operations LLC (d/b/a
The Palms Rehabilitation and Healthcare
Center)
611 South 13th Street Operations LLC
(d/b/a Fort Pierce Health Care)
626 North Tyndall Parkway Operations LLC
(d/b/a Emerald Shores Health and
Rehabilitation)
6305 Cortez Road West Operations LLC
(d/b/a Bradenton Health Care)
6414 13th Road South Operations, LLC
(d/b/a Wood Lake Health and Rehabilitation
Center)
650 Reed Canal Road Operations LLC
(d/b/a Oaktree Healthcare)
6700 NW 10th Place Operations LLC (d/b/a
North Florida Rehabilitation and Specialty
Care)
702 South Kings Avenue Operations LLC
(d/b/a Central Park Healthcare and
Rehabilitation Center)
710 North Sun Drive Operations LLC (d/b/a
Lake Mary Health and Rehabilitation
Center)
741 South Beneva Road Operations LLC
(d/b/a Beneva Lakes Assisted Living Center;
Beneva Lakes Healthcare and Rehabilitation
Center)
777 Ninth Street North Operations LLC
(d/b/a Heritage Healthcare and
Rehabilitation Center)
7950 Lake Underhill Road Operations LLC
(d/b/a Rio Pinar Health Care)
9035 Bryan Dairy Road Operations LLC
(d/b/a Bardmoor Oaks Healthcare and
Rehabilitation Center (f/k/a Largo Health
and Rehabilitation Center))
9311 South Orange Blossom Trail
Operations LLC (d/b/a Parks Healthcare and
Rehabilitation Center, The)
9355 San Jose Boulevard Operations LLC
(d/b/a San Jose Health and Rehabilitation
Center)

Alpha Health Care Properties, LLC
Ambassador Ancillary Services, LLC
Ambassador Rehabilitative Services, LLC
Ashland Facility Operations, LLC (d/b/a
Ashland Nursing & Rehabilitation Center)
Ashton Court HealthCare, LLC (d/b/a
Ashton Court Care and Rehabilitation
Centre)
Assisted Living at Frostburg Village Facility
Operations, LLC (d/b/a Assisted Living at
Frostburg Village)
Augusta Facility Operations, LLC (d/b/a
Augusta Nursing and Rehab Center)
Augusta Health Care Properties, LLC
Baya Nursing and Rehabilitation, LLC
(d/b/a Baya Pointe Nursing and
Rehabilitation Center)
Bayonet Point Facility Operations, LLC
(d/b/a Consulate Health Care of Bayonet
Point)
Bossier HealthCare, LLC (d/b/a Heritage
Manor of Bossier)
Brandon Facility Operations, LLC (d/b/a
Consulate Health Care of Brandon)
Brentwood Meadow Health Care
Associates, LLC (d/b/a Brentwood
Retirement Community)
Briley Facility Operations, LLC
Brownsboro Hills HealthCare, LLC (d/b/a
Brownsboro Hills Health Care and
Rehabilitation Center)
Canonsburg Property Investors, LLC
Capital Health Care Associates, LLC (d/b/a
Capital Healthcare Center
Cardinal North Carolina HealthCare, LLC
(d/b/a Cardinal Healthcare and
Rehabilitation Center)
Carey Facility Operations, LLC
Cary HealthCare, LLC (d/b/a Cary Health
and Rehabilitation Center)
Catalina Gardens Health Care Associates,
LLC (d/b/a Brookshire, The)
Catalina Health Care Associates, LLC
Centennial Acquisition Corporation
Centennial Employee Management, LLC
Centennial Five Star Master Tenant, LLC

Centennial HealthCare Corporation
Centennial Healthcare Holding Company
LLC
Centennial HealthCare Investment
Corporation
Centennial HealthCare Management
Corporation
Centennial HealthCare Properties
Corporation
Centennial Healthcare Properties, LLC
Centennial Management Investment, LLC
Centennial Master Subtenant, LLC
Centennial Master Tenant, LLC
Centennial Newco Holding Company, LLC
Centennial Professional Therapy Services
Corporation
Centennial SEHC Master Tenant LLC
Centennial Service Corporation - Grant Park
Charlwell HealthCare, LLC (d/b/a Charlwell
House)
Chenal HealthCare, LLC (d/b/a Chenal
Rehabilitation and Healthcare Center)
Cheswick Facility Operations, LLC (d/b/a
Consulate Health Care of Cheswick)
CHIC Holding Company, LLC
CHMC Holding Company, LLC
CHPC Holding Company LLC
Clay County HealthCare, LLC (d/b/a Clay
County Care Center)
Clearwater HealthCare, LLC (d/b/a
Clearwater Health and Rehabilitation)
Coastal Administrative Services, LLC
Coastal Management Investment, LLC
Consulate EV Acquisition, LLC
Consulate EV Master Tenant, LLC
Consulate EV Operations I, LLC
Consulate Facility Leasing, LLC
Consulate Management Company III, LLC
(d/b/a Consulate Health Care)
Consulate MZHBS Leaseholdings, LLC
Consulate NHCGL Leaseholdings, LLC
Country Meadow Facility Operations, LLC
(d/b/a Country Meadow Care Center)
Crestline Facility Operations, LLC (d/b/a
Crestline Nursing Center)

Cypress Manor Health Care Associates,
LLC
Cypress Square Health Care Associates,
LLC (d/b/a Cypress Square Villas)
D.C. Medical Investors Limited Partnership
Donegan Square Health Care Associates,
LLC (d/b/a Keystone Villas Assisted Living
Center)
Down East HealthCare, LLC (d/b/a Down
East Health and Rehabilitation Center)
Edinburgh Square Health Care
Associates, LLC (d/b/a Villas at Lakeside
Oaks, The)
Emerald Ridge HealthCare, LLC (d/b/a
Emerald Ridge Rehabilitation and Care
Center)
Envoy Health Care, LLC
Envoy Management Company, LLC
Envoy of Alexandria, LLC (d/b/a Envoy of
Alexandria)
Envoy of Denton, LLC (d/b/a Envoy of
Denton)
Envoy of Forest Hills, LLC (d/b/a Bonview
Rehabilitation and Healthcare)
Envoy of Fork Union, LLC (d/b/a Envoy at
the Village)
Envoy of Goochland, LLC (d/b/a Envoy at
the Meadows)
Envoy of Lawrenceville, LLC (d/b/a Envoy
of Lawrenceville)
Envoy of Norfolk, LLC (d/b/a Envoy of
Thornton Hall; Envoy of Thornton Hall
(ALF))
Envoy of Pikesville, LLC (d/b/a Envoy of
Pikesville)
Envoy of Richmond, LLC (d/b/a Envoy of
Westover Hills)
Envoy of Somerset, LLC (d/b/a Siemon's
Heritage Personal Care Center; Siemon's
Lakeview Manor Nursing and Rehabilitation
Center)
Envoy of Staunton, LLC (d/b/a Envoy of
Staunton)
Envoy of Williamsburg, LLC (d/b/a Envoy
of Williamsburg)

Envoy of Winchester, LLC (d/b/a Envoy of Winchester)
Envoy of Woodbridge, LLC (d/b/a Envoy of Woodbridge)
Epsilon Health Care Properties, LLC
Ferriday HealthCare, LLC (d/b/a Heritage Manor Health and Rehabilitation Center)
FLLVMT, LLC
Florida Health Care Properties, LLC
Floridian Facility Operations, LLC (d/b/a Floridean Nursing and Rehabilitation Center, The)
Forrest Oakes HealthCare, LLC (d/b/a Forrest Oakes Healthcare Center)
Franklinton HealthCare, LLC (d/b/a Heritage Manor of Franklinton)
Frostburg Facility Operations, LLC (d/b/a Frostburg Village)
Garden Court HealthCare, LLC (d/b/a Garden Court Health and Rehabilitation Center)
Gateway HealthCare, LLC (d/b/a Gateway Rehabilitation and Healthcare)
Genoa Healthcare Consulting, LLC
Genoa Healthcare Group, LLC
Glenburney HealthCare, LLC (d/b/a Glenburney Health Care and Rehabilitation Center)
Grant Park Nursing Home Limited Partnership
Grayson Facility Operations, LLC (d/b/a Grayson Rehabilitation and Health Care Center)
Green Cove Facility Operations LLC (d/b/a Green Cove Springs Rehabilitation and Care Center)
Greenfield Facility Operations, LLC (d/b/a Edgewood Manor of Greenfield)
Harbor Pointe Facility Operations, LLC (d/b/a Village at Harbor Pointe, The; Lutheran Village at Harbor Pointe)
HFLLVMT, LLC
Hilltop Mississippi HealthCare, LLC (d/b/a Hilltop Manor Health and Rehabilitation Center)
Hilltopper Holding Corp.

Hollywell HealthCare, LLC
Hunter Woods HealthCare, LLC (d/b/a Hunter Woods Nursing and Rehabilitation Center)
Hurstbourne HealthCare, LLC (d/b/a Hurstbourne Care Centre at Stony Brook)
Jacksonville Facility Operations, LLC (d/b/a Consulate Health Care of Jacksonville)
Jennings HealthCare, LLC (d/b/a Jennings Healthcare Center)
Josera, LLC (d/b/a Independence Living Centers)
Kannapolis HealthCare, LLC (d/b/a Transitional Health Services of Kannapolis)
KD HealthCare, LLC (d/b/a Kathleen Daniel)
Kenton Facility Operations, LLC (d/b/a Kenton Nursing & Rehabilitation Center)
Kenwood View HealthCare, LLC (d/b/a Kenwood View Health and Rehabilitation Center)
Kimwell HealthCare, LLC (d/b/a Kimwell)
Kings Daughters Facility Operations, LLC (d/b/a Kings Daughters Community Health & Rehab)
Kissimmee Facility Operations, LLC (d/b/a Consulate Health Care of Kissimmee)
Lake Parker Facility Operations, LLC (d/b/a Consulate Health Care at Lake Parker)
Lakeland Facility Operations, LLC (d/b/a Consulate Health Care of Lakeland)
Legends Facility Operations, LLC (d/b/a Legends Care Center)
Level Up Staffing, LLC
Libby HealthCare, LLC (d/b/a Libby Care Center)
Lidenskab, LLC (d/b/a Raydiant Health Care)
Lincoln Center HealthCare, LLC (d/b/a Lincoln Centers for Rehabilitation and Healthcare)
Locust Grove Facility Operations, LLC (d/b/a Locust Grove Retirement Village; The Cottages at Locust Grove)
LTC Insurance Associates, LLC

Lucasville I Facility Operations, LLC (d/b/a Edgewood Manor of Lucasville I)
Lucasville II Facility Operations, LLC (d/b/a Edgewood Manor of Lucasville II)
Luther Ridge Facility Operations, LLC (d/b/a Luther Ridge at Seiders Hill)
LV CHC Holdings I, LLC
LV Operations I, LLC
LV Operations II, LLC
LVE Holdco, LLC
LVE Master Tenant 1, LLC
LVE Master Tenant 2, LLC
LVE Master Tenant 3, LLC
LVE Master Tenant 4, LLC
LVFH Master Tenant, LLC
LVLUPH, LLC
MA HealthCare Holding Company, LLC
Manor at St. Luke Village Facility Operations, LLC (d/b/a Manor at St. Luke Village, The)
McComb HealthCare, LLC (d/b/a Courtyard Rehabilitation and Healthcare)
Melbourne Facility Operations, LLC (d/b/a Consulate Health Care of Melbourne)
Miami Facility Operations, LLC (d/b/a Franco Nursing & Rehabilitation Center)
Milton HealthCare, LLC (d/b/a Milton Health Care)
Montclair HealthCare, LLC (d/b/a Montclair Nursing and Rehabilitation Center)
Mount Royal Facility Operations, LLC (d/b/a Mount Royal Villa)
NENC HealthCare Holding Company, LLC
New Harmonie HealthCare, LLC (d/b/a New Harmonie Healthcare Center)
New Port Richey Facility Operations, LLC (d/b/a Consulate Health Care of New Port Richey)
Newport News Facility Operations, LLC (d/b/a Newport News Nursing and Rehabilitation Center)
Norfolk Facility Operations, LLC (d/b/a Consulate Health Care of Norfolk)
North Carolina Master Tenant, LLC

North Fort Myers Facility Operations, LLC (d/b/a Consulate Health Care of North Fort Myers)
North Strabane Facility Operations, LLC (d/b/a Consulate Health Care of North Strabane)
Oak Grove HealthCare, LLC (d/b/a Oak Grove Healthcare Center)
Oaks at Sweeten Creek HealthCare, LLC (d/b/a Oaks at Sweeten Creek, The)
Omro HealthCare, LLC (d/b/a Omro Care Center)
Onetete, LLC
Orange Park Facility Operations, LLC (d/b/a Consulate Health Care of Orange Park)
Osprey Nursing and Rehabilitation, LLC (d/b/a Osprey Point Nursing Center)
Paloma Blanca Health Care Associates, LLC (d/b/a Paloma Blanca Health and Rehabilitation)
Parkside Facility Operations, LLC (d/b/a Parkside Manor)
Parkview Facility Operations, LLC (d/b/a Parkview Care Center)
Parkview HealthCare, LLC (d/b/a Parkview Nursing and Rehabilitation Center)
Parkview Manor HealthCare, LLC (d/b/a Parkview Manor Health and Rehabilitation Center)
Parkwell HealthCare, LLC (d/b/a Parkwell)
Pavilion at St. Luke Village Facility Operations, LLC (d/b/a Amity Village; Pavilion at St. Luke Village, The)
Penn Village Facility Operations, LLC (d/b/a Manor at Penn Village, The; Pennsfield Apartments)
Pennknoll Village Facility Operations, LLC (d/b/a Pennknoll Village)
Pensacola Facility Operations, LLC (d/b/a Consulate Health Care of Pensacola)
Perry Facility Operations, LLC (d/b/a Perry Oaks Health Care)
Perry Village Facility Operations, LLC (d/b/a Manor at Perry Village, The)

Pheasant Ridge Facility Operations, LLC
(d/b/a Pheasant Ridge Nursing and Rehab
Center)
Piketon Facility Operations, LLC (d/b/a
Piketon Nursing Center)
Pine River HealthCare, LLC (d/b/a Pine
River Healthcare Center)
Pinelake HealthCare, LLC
Pinewood HealthCare, LLC (d/b/a Coeur
d'Alene Health Care and Rehabilitation
Center)
Port Charlotte Facility Operations, LLC
(d/b/a Consulate Health Care of Port
Charlotte)
QCPMT, LLC
RAC Insurance Investors, LLC
Reeders Facility Operations, LLC (d/b/a
Reeders Memorial Home; Reeders
Memorial Home (IL))
Retirement Village of North Strabane
Facility Operations, LLC (d/b/a Consulate
Retirement Village of North Strabane)
Ridgewood Facility Operations, LLC (d/b/a
Ridgewood Manor)
Riley HealthCare, LLC (d/b/a Oaks
Rehabilitation and Healthcare Center, The)
Rispetto, LLC
Riverbend HealthCare, LLC (d/b/a
Riverbend Health Care Center)
Riverview of Ann Arbor HealthCare, LLC
Royal Terrace HealthCare, LLC (d/b/a
Royal Terrace Nursing and Rehabilitation
Center)
Safety Harbor Facility Operations, LLC
(d/b/a Consulate Health Care of Safety
Harbor)
Salus Management Investment, LLC
Sarasota Facility Operations, LLC (d/b/a
Consulate Health Care of Sarasota)
Sea Crest Management Investment, LLC
Sheridan Indiana HealthCare, LLC (d/b/a
Sheridan Rehabilitation and Healthcare
Center)
Shoreline Healthcare Management, LLC
Skyline Facility Operations, LLC (d/b/a
Skyline Nursing and Rehabilitation Center)

Southpoint Health Care Associates, LLC
St. Petersburg Facility Operations, LLC
(d/b/a Consulate Health Care of St.
Petersburg)
Starkville Manor HealthCare, LLC (d/b/a
Starkville Manor Health Care and
Rehabilitation Center)
Stratford Facility Operations, LLC (d/b/a
Consulate Health Care of Chattanooga)
Summit Facility Operations, LLC (d/b/a
Summit Villa Care Center)
Susquehanna Village Facility Operations,
LLC (d/b/a Manor at Susquehanna Village)
Swan Pointe Facility Operations, LLC (d/b/a
Addison Heights Health and Rehabilitation
Center)
Tallahassee Facility Operations, LLC (d/b/a
Consulate Health Care of Tallahassee)
Tarpon Health Care Associates, LLC
THS Partners I, Inc.
THS Partners II, Inc.
Tosturi, LLC
Transitional Health Partners (d/b/a
Transitional Health Services)
Transitional Health Services, Inc.
Valley View HealthCare, LLC (d/b/a Valley
View Care and Rehabilitation Center)
VAPAMT, LLC
Vero Beach Facility Operations, LLC (d/b/a
Consulate Health Care of Vero Beach)
VNTG HD Master Tenant, LLC
Walnut Cove HealthCare, LLC (d/b/a
Walnut Cove Health and Rehabilitation
Center)
Wayne HealthCare, LLC (d/b/a Transitional
Health Services of Wayne)
Wellington HealthCare, LLC (d/b/a
Wellington Rehabilitation and Healthcare)
Wellston Facility Operations, LLC (d/b/a
Edgewood Manor of Wellston)
West Altamonte Facility Operations, LLC
(d/b/a Consulate Health Care at West
Altamonte)
West Palm Beach Facility Operations, LLC
(d/b/a Consulate Health Care of West Palm
Beach)

Westerville Facility Operations, LLC (d/b/a Edgewood Manor of Westerville)
Westwood HealthCare, LLC (d/b/a Westwood Health and Rehabilitation Center)
Whispering Hills Facility Operations, LLC (d/b/a Whispering Hills Care Center)
Whitehall of Ann Arbor HealthCare, LLC (d/b/a Whitehall Healthcare Center of Ann Arbor)
Whitehall of Novi HealthCare, LLC (d/b/a Whitehall Healthcare Center of Novi)
Williamsburg Facility Operations, LLC (d/b/a Consulate Health Care of Williamsburg)
Willowbrook HealthCare, LLC (d/b/a Willowbrook Rehabilitation and Care Center)
Wilora Lake HealthCare, LLC (d/b/a Wilora Lake Healthcare Center)
Windsor Facility Operations, LLC (d/b/a Consulate Health Care of Windsor)
Winona Manor HealthCare, LLC (d/b/a Winona Manor Health Care and Rehabilitation Center)
Winter Haven Facility Operations, LLC (d/b/a Consulate Health Care of Winter Haven)
Woodbine HealthCare, LLC (d/b/a Woodbine Healthcare and Rehabilitation Center)
Woodstock Facility Operations, LLC (d/b/a Consulate Health Care of Woodstock)

Non-Debtor Affiliates

FC Investors XXI, LLC
LV Investment, LLC
ISNP Holdings I, LLC
ISNP Holdings II, LLC
CPSTN Management, LLC
CPSTN Holdings, LLC
CPSTN Operations, LLC
LaVie HoldCo, LLC
Zomleben, LLC (d/b/a Synergy Healthcare Solutions)

Pourlessoins, LLC (d/b/a Synergy Healthcare Services)
NSPR Operations I, LLC
NSPR Operations II, LLC
NSPR Care Centers, LLC
NSPRMC II, LLC
HVETJA, LLC
NSPRMC, LLC (d/b/a Nspire Healthcare)
MLNM Master Tenant, LLC
9400 SW 137th Avenue Operations, LLC (d/b/a Kendall NSPIRE Healthcare)
5725 NW 186th Street Operations, LLC (d/b/a Miami Lakes NSPIRE Healthcare)
5901 NW 79th Avenue Operations, LLC (d/b/a Tamarac NSPIRE Healthcare)
2599 NW 55th Avenue Operations, LLC (d/b/a Lauderhill NSPIRE Healthcare)
6931 W Sunrise Boulevard Operations, LLC (d/b/a Plantation NSPIRE Healthcare)
FGCMT, LLC
MLNM HDMT, LLC
FGLFC HoldCo, LLC
1304 Walnut Street Operations, LLC (d/b/a Pine View Health and Rehabilitation Center)
340 DeSoto Avenue Ext Operations, LLC (d/b/a Greenbough Health and Rehabilitation Center)
1530 Broad Avenue Operations, LLC (d/b/a Coastal Health and Rehabilitation Center)
538 Menge Avenue Operations, LLC (d/b/a Pass Christian Health and Rehabilitation Center)
1199 Ocean Springs Road Operations, LLC (d/b/a Ocean Springs Health and Rehabilitation Center)
FMRGC HoldCo, LLC
4294 3rd Avenue Operations, LLC (d/b/a Chipola Health and Rehabilitation Center)
Norfolk HoldCo, LLC
Hampton Parent LLC
Hampton Blvd Operations LLC (d/b/a Ghent Health and Rehabilitation Center)

Current and Former Officers

John Silliter
Jared Elliot

Craig Robinson
Timothy Lehner
Jeron Walker
Miriam Pastor
Brian Beckerhoff
Tiffany Hoback

Secured Lenders

MidCap Financial Trust
MidCap Funding IV Trust
OHI Mezz Lender, LLC

DIP Lenders

OHI DIP Lender, LLC
TIX 33433 LLC

Chapter 11 Professionals

Ankura Consulting Group, LLC
McDermott Will & Emery LLP
Kurtzman Carson Consultants LLC
Troutman Pepper Hamilton Sanders LLP
FTI Consulting, Inc.

Unsecured Creditors' Committee

Healthcare Services Group, Inc.
Omnicare, Inc.
Twin Med, LLC
ShiftMed, LLC
CBD Services USA, LLC
Amidon Nurse Staffing
Healthcare Negligence Settlement Recovery Corp.
The Estate of Nancy Walsh
Theodore Horrobin

Banks

Regions Bank
Wells Fargo
PNC Bank
CIBC Bank
TD Bank
Chase
Capital One
Atlantic Union
Truist
Wells Fargo Bank
Citi Bank

Somerset Trust Co.
CIBC
Atlantic Union Bank
First National
PNC Bank
Wells Fargo
First National Bank
Pennian Bank
Skyline Bank
United Community Bank

Landlords

CSE WoodFin LP
CSE Lenoir LP
CSE Arden LP
CSE Walnut Cove LLC
CSE Knightdale LP
OHI Asset (FL), LLC
CSE Orlando – Pinar Terrace Manor LLC
Hazleton Re Owner LLC
Mifflin Re Owner LLC
Pottsville Re Owner LLC
Selinsgrove Re Owner LLC
Everett Re Owner LLC
OHI Asset (VA) Ashland, LLC
OHI Asset (VA) Norfolk – 3900 Llewellyn, LLC
FC Encore Properties, LLC
FC Encore Properties B Holdco, LLC
FC Encore Franklinton, LLC
FC Encore Bossier City I, LLC
FC Encore McComb, LLC
FC Encore Archdale, LLC
FC Encore Cary, LLC
FC Encore Kannapolis, LLC
FC Encore Charlotte, LLC
OHI Asset (FL) Jacksonville – 4101 Southpoint Drive, LLC
OHI Asset (FL) Fort Myers, LLC
OHI Asset (FL) Orange Park, LLC
OHI Asset (FL) Safety Harbor, LLC
OHI Asset (FL) Seminole, LLC
OHI Asset (FL) Tallahassee, LLC
FC Encore Green Cove Springs, LLC
FC Encore Perry, LLC
FC Encore Destin, LLC

Welltower NNN Group LLC
Jacksonville Nursing Home, Ltd.
Elderberry of Hayesville, LLC
Elderberry of Lincolnton, LLC
Elderberry of Charlotte, LLC
FC Encore Natchez, LLC
FC Encore Union, LLC
FC Encore Meridian, LLC
FC Encore Starkville, LLC
FC Encore Winona, LLC
FC Encore Albemarle, LLC
FC Encore Andrews, LLC
FC Encore Rutherfordton, LLC
FC Encore Yadkinville, LLC

Utility Providers

Advanced Telecom Systems
Afton Communications Corp.
Allbridge LLC
American Electric Power
Amerigas
Ascentium Capital LLC
Atmos Energy
Augusta County Service Authority
Bedford Rural Electric
Blossman LP Gas Service Inc.
Blue Ridge Energies, LLC
Blue Ridge Mountain Electric
Borough of Selinsgrove
Brask Enterprises Inc.
Brightspeed
Broad River Water Authority
Cable TV
Centerpoint Energy
CenturyLink
Charter Communications
Citizens Coop
City of Albemarle
City of Archdale
City of Asheville
City of Charlotte
City of Kannapolis
City of Lenoir
City of Lincolnton
City of McComb
City of Meridian

City of Raleigh
City of Staunton
City of Union
Clark Gas & Oil, Inc.
Clay County Water & Sewer District
Columbia Gas of Virginia
Comcast
County of Isle of Wight
Cox Business Services
Cox Communications
Curtis Bay Energy-Baltimore
Dominion Energy North Carolina
Dominion Energy Virginia
Dominion Virginia Power
DTE Incorporated
Duke Energy
Dumpster USA Inc.
Emco Consulting
Entergy
First Piedmont Waste Solution
Floyd County
Frontier
Gas South LLC
GFL Environmental Holdings Inc.
Greater Hazleton Joint Sewer
Hanover County Dept.
Hazleton City Authority
HRSD
HRUBS
JEA
Koppys Propane Inc.
Level 3 Communications LLC
Lumos Networks
Maxxsouth Broadband
Mettel
Mississippi Power Company
Natchez Water Works
New Horizon Communications
Newport News Waterworks
North State Gas Service
Northland Communications
NRG Business Marketing
One Stop Communications of PA
Pak-Rite Rentals Inc.
Pen Teledata LP 1
Pheasant Ridge Land Investors LLC

Piedmont Natural Gas Co
PPL Electric Utilities
Republic Services #759
Republic Services Inc.
Roanoke Gas Co.
Schuykill County Municipal
Senior TV
Service Electric Cable
Shenandoah Valley Electric
Shentel
Snake Spring Township
Southern States Tidewater
Sparklight
Starkville Electric
Stericycle Inc.
Suburban Propane
Teco Peoples Gas
Time Warner Cable
Town of Andrews
Town of Cary
Town of Independence
Town of Walnut Cove
Town of Windsor
Town of Woodstock
Town of Yadkinville
Twilio Inc.
Twin Boroughs Sanitary
UGI Utilities
Verizon
Virginia Natural Gas
Washington Gas
Waste Management
Waste Pro
Weaver's Sanitation Service
Western Virginia Water Authority
Windstream
Winona Public Utility
Yadkin Propane
Yadkin Valley Telephone
Zito Media

Taxing Authorities

Alachua County Tax Collector
Bay County Tax Collector
Brevard County Tax Collector
Broward County Revenue Collector

Charlotte County Tax Collector
Citrus County Tax Collector
Clay County Tax Collector
Collier County Tax Collector
Duval County Tax Collector
Escambia County Tax Collector
Flagler County Tax Collector
Hernando County Tax Collector
Hillsborough County Tax Collector
Lee County
Leon County Tax Collector
Manatee County Tax Collector
Miami-Dade County Tax Collector
Okaloosa County Tax Collector
Orange County Tax Collector
Osceola County Tax Collector
Palm Beach County Tax Collector
Pinellas County Tax Collector
Polk County Tax Collector
Sarasota County Tax Collector
Seminole County Tax Collector
Taylor County Tax Collector
Volusia County Tax Collector
St. Lucie County Tax Collector
Columbia County Tax Collector
Sumter County
Florida Department of Revenue
Commonwealth of Kentucky
Maryland State Dept of Assessments
City of Bossier
Parish of Bossier (Whit)
Concordia Parish
Town of Ferriday Tax Collector
Washington Parish Sheriff's Office
Washington Parish Tax Collector
Town of Franklinton Tax Collector
Louisiana Department of Revenue
Adams County Tax Collector
Neshoba County Tax Collector
Pike County Tax Collector
Lauderdale County Tax Collector
Oktibbeha County Tax Collector
Montgomery County Tax Collector
City of Winona Tax Collector
Mississippi Department of Revenue
Stanly County Tax Collector

Cherokee County Tax Collector
Randolph County Tax Collector
Lincoln County Tax Administrator
Wake County Revenue Department
Buncombe County Tax Collector
Caldwell County Tax Collector
City of Lenoir Tax Office
Mecklenberg County Tax Collector
Carbarrus County Tax Collector
Rutherford County Tax Collector
Stokes County Tax Department
Clay County Tax Collector
Town of Andrews
Town of Yadkinville
Yadkin County Tax Collector
North Carolina Department of Revenue
Snake Springs Township Tax Collector
Milford Township Tax Collector
Luzerne County Treasurer's Office
N Manheim Township Tax Collector
HAB-MISC
Selinsgrove Tax Collector
Pennsylvania Department of Revenue
City of Norfolk
City of Norfolk Comm of Revenue
Town of Ashland
Hanover County
Augusta County Treasurer
City of Roanoke Treasurer
Commissioner of the Revenue (Roanoke)
City of Newport News
Commissioner of the Revenue (Newport News)
City of Staunton Treasurer
Commissioner of the Revenue (Staunton)
Grayson County
Town of Independence, VA
James City County
Isle of Wight County
Town Windsor
Shenandoah County
Town of Woodstock
Floyd County
Virginia Dept. of Taxation
Taxing Authority Consulting Services PC

Employee Benefit Providers

Leading Edge Administrators
Voya Financial
Optum Bank
WEX, Inc.
Unum Group
EyeMed
Ameritas BlueStar
The Chubb Insurance Company
Zurich American Insurance Company
Automatic Data Processing, Inc.
Payactiv/OnShift
Elan
Comdata
National Datacare
Worldpay, Inc.
Aflac
AXA XL

Insurance Carriers

Arch Specialty Insurance Company
Arch Insurance North America
Ascot Insurance Company
Axis Surplus Insurance Company
Beazley Excess & Surplus Insurance
Beazley Insurance Company, Inc.
Covington Specialty Insurance Company
Crum & Foster Specialty Insurance
Company
Endurance American Specialty Insurance
Company
Everest Indemnity Insurance Company
Greenwich Insurance Company
Hartford Fire Insurance Co.
HDI Global Specialty SE
Hudson Insurance Company
Imperial Fire and Casualty Insurance
Company
Indian Harbor Insurance Company
Ironshore Specialty Insurance Company
Lexington Insurance Company
Lloyd's
Lloyds of London
Midwest Insurance Group Inc., a RRG
Mt Hawley Insurance Company
MunichRe

National Union Fire Ins. Co. of Pittsburgh
PA
Navigators Specialty Insurance Company
Obsidian Specialty Insurance Company
PartnerRe Insurance Solutions Bermuda Ltd
RSUI Indemnity Company
Starstone Specialty Insurance Company
Travelers Property Casualty Co. of America
Twin City Fire Insurance Co.
Westchester Surplus Lines Insurance Co.
Wright National Flood Insurance Company
XL Specialty Insurance

Employment Agencies

Staffquest Inc.
Sun Quest
Precision Staffing

Unions

United Food & Commercial Workers Union
United Steel, Paper, and Forestry, Rubber,
Manufacturing, Energy, Allied Industrial
and Service Workers International Union
Local 15198-01
District Council 86, American Federation of
State, County, and Municipal Employees,
AFL/CIO
District Council 87, American Federation of
State, County and Municipal Employees,
AFL-CIO

Top 50 Trade Creditors

Healthcare Services Group, Inc.
Powerback Rehabilitation
Shiftmed LLC
Twin Med LLC
Gale Healthcare Solutions LLC
Omnicare Inc.
Superior Medical Staffing
Direct Supply
PA Nursing Facility Assessment
Amidon Nursing Staffing LLC
Precision Healthcare Staffing
CDB Services USA LLC
Snapmedtech Inc.
Coastal Care Nursing Assoc. Inc.
Ecapital Commerical Finance

Shiftkey LLC
Accurate Healthcare
Nursecore Management Services
Focal Point Medical Staffing
Caremasters Healthcare Service
Maxim Healthcare Service
Caremasters Homehealth LLC
Milestone Staffing Services
Island Nurse Staffing
Respiratory Health Services
Staffquest Inc.
Intelycare Inc.
ATAAM Staffing, LLC
Nurses That Aid, LLC
Fusion Medical Staffing LLC
Worx Staffing Group Inc.
American Health Associates Inc.
Careerstaff Unlimited LLC
Iron Mountain Inc.
Care Advantage, Inc.
Connect Rn Inc.
TwoMagnets Inc.
Lifefleet Southeast Inc.
General Healthcare Resources
Comprehensive Energy Services
Medic Air Systems Inc.
Favorite Healthcare Staffing
Harman Claytor Corrigan
Grove Medical Inc.
Houlihan Lokey Financial
Dynafire Inc.
Medacure Inc.
Indeed Inc.
S&J Healthcare, LLC
Optimum

Governmental Authorities

Centers for Medicare and Medicaid
Department of Justice
Department of Health & Human Services

**Judges – Bankruptcy Court for the
Northern District of Georgia**

Barbara Ellis-Monro
Paul M. Baisier
Paul W. Bonapfel

Jeffery W. Cavender
Wendy L. Hagenau
Lisa Ritchey Craig
James R. Sacca
Sage M. Sigler

Court Staff – Northern District of Georgia

Vania S. Allen
Shannon Morris
Monique Chapple
Kristi Gillespie
Nicholas Mahone
Ashleigh Marchant-Lessa
Saahir Webb
Regina Flanagan
Darren Hensley
Mortiz “Devon” Holloway
Stephen Roach
David Fass
Charles Ferrelle
Aaron Anglin
James Cornett
Kimberly Williams
Maresa Snow

Members of United States Trustee Office for Region 21, Atlanta Office

Mary Ida Townson, U.S. Trustee
R. Jeneane Treace, Assistant U.S. Trustee
Jonathan S. Adams
Beth Brown
Anne Cabrera
Allison Cleary
Roslyn Dowdy
Chevonne Ducille
Randal D. Ennever
Alan Hinderleider
Adriano O. Iqbal
Deborah R. Jackson
Tara Kelly
Lindsay Kolba
Heidi O’Brien
Martin P. Ochs
Roxana Peterson
Donavan Slack
Lisa Smoot
Michele Stephens-Taylor
David Weidenbaum

SCHEDULE 2

**INTERESTED PARTIES THAT CURRENTLY EMPLOY
OR HAVE FORMERLY EMPLOYED CHAPMAN IN MATTERS UNRELATED
TO THE DEBTORS OR THE CHAPTER 11 CASES**

| INTERESTED PARTY FROM SCHEDULE 2 | RELATIONSHIP TO DEBTORS | DISCLOSURE OF CONNECTION TO CHAPMAN* |
|---|------------------------------------|---|
| MidCap Financial Trust | Secured Lender | Client in unrelated matters |
| MidCap Funding IV Trust | Secured Lender | Affiliate of client in unrelated matters |
| Ankura Consulting Group, LLC | Chapter 11 Professional | Client in unrelated matters |
| Kurtzman Carson Consultants LLC | Chapter 11 Professional | Affiliate of client in unrelated matters |
| Regions Bank | Bank | Client in unrelated matters |
| Wells Fargo | Bank | Client in unrelated matters |
| PNC Bank | Bank | Client in unrelated matters |
| CIBC | Bank | Client in unrelated matters |
| TD Bank | Bank | Client in unrelated matters |
| Chase | Bank | Client in unrelated matters |
| Capital One | Bank | Client in unrelated matters |
| Truist | Bank | Client in unrelated matters |
| Citi Bank | Bank | Client in unrelated matters |
| United Community Bank | Bank | Client in unrelated matters |
| First National Bank | Bank | Client in unrelated matters |

*Chapman has not performed independent research to identify all stockholder interests or other affiliate relationships with respect to interested parties. Additionally, has not disclosed representations of trade associations and similar industry or special interest organizations in which interested parties are members.

| INTERESTED PARTY FROM SCHEDULE 2 | RELATIONSHIP TO DEBTORS | DISCLOSURE OF CONNECTION TO CHAPMAN* |
|---|--------------------------------|---|
| Ascentium Captial LLC | Utility Provider | Affiliate of client in unrelated matters |
| Centerpoint Energy | Utility Provider | Client in unrelated matters |
| Frontier Climate | Utility Provider | Affiliate of client in unrelated matters |
| PPL Electric Utilities | Utility Provider | Affiliate of client in unrelated matters |
| Voya Financial | Employee Benefit Provider | Client in unrelated matters |
| Optum Bank | Employee Benefit Provider | Client in unrelated matters |
| Unum Group | Employee Benefit Provider | Client in unrelated matters |
| Ameritas BlueStar | Employee Benefit Provider | Affiliate of client in unrelated matters |
| Chubb Insurance Company | Employee Benefit Provider | Client in unrelated matters |
| Zurich American Insurance Company | Employee Benefit Provider | Client in unrelated matters; Firm vendor |
| Aflac | Employee Benefit Provider | Client in unrelated matters |
| Arch Speciality Insurance Company | Insurance Carrier | Client in unrelated matters |
| Arch Insurance North America | Insurance Carrier | Client in unrelated matters |
| Axis Surplus Insurance Company | Insurance Carrier | Client in unrelated matters |
| Endurance American Speciality Insurance Company | Insurance Carrier | Client in unrelated matters |
| Everest Indemnity Insurance Company | Insurance Carrier | Client in unrelated matters |
| Hartford Fire Insurance Co. | Insurance Carrier | Client in unrelated matters |

| INTERESTED PARTY FROM SCHEDULE 2 | RELATIONSHIP TO DEBTORS | DISCLOSURE OF CONNECTION TO CHAPMAN* |
|---|--------------------------------|---|
| Lexington Insurance Company | Insurance Carrier | Client in unrelated matters |
| Lloyd's | Insurance Carrier | Client in unrelated matters |
| Lloyds of London | Insurance Carrier | Client in unrelated matters |
| Mt Hawley Insurance Company | Insurance Carrier | Client in unrelated matters |
| National Union Fire Ins. Co. of Pittsburgh PA | Insurance Carrier | Client in unrelated matters |
| Navigators Speciality Insurance Company | Insurance Carrier | Client in unrelated matters |
| RSUI Indemnity Company | Insurance Carrier | Client in unrelated matters |
| Travelers Property Casualty Co. of America | Insurance Carrier | Client in unrelated matters |
| Iron Mountain | Top 50 Trade Creditor | Firm vendor |
| Indeed, Inc. | Top 50 Trade Creditor | Firm vendor |

EXHIBIT C

Engagement Letter



Larry G. Halperin
Partner

Chapman and Cutler LLP
1270 Avenue of the Americas
New York, NY 10020

D 212.655.2517
C 917.860.3359
halperin@chapman.com

May 24, 2024

VIA E-MAIL

James D. Decker
450 Huntcliff Green
Atlanta, GA 30350

Re: Supplement to Original Engagement Letter

Jim:

Reference is made to that certain engagement letter (the "*Original Engagement Letter*") dated February 4, 2020, from Chapman and Cutler LLP (the "*Firm*") to you regarding your engagement of the Firm to represent you in connection with your various board engagements and consulting arrangements. Capitalized terms used but undefined herein shall have the meanings set forth in the Original Engagement Letter.

Scope of Representation. The Letter shall supplement the Original Engagement Letter regarding our representation of you in your capacity as the sole "Independent Manager" of LV Operations I, LLC, a Delaware limited liability company. Our representation of you as sole Independent Manager shall include an investigation regarding potential claims and causes of action belonging to LV Operations I, LLC, and its direct and indirect subsidiaries, including those matters alleged in that certain lawsuit filed on April 22, 2024 in the Circuit Court of the Eleventh Judicial Circuit, Miami-Dade County, Florida, Civil Division, Case No. 2024-007342-CA-01, captioned Healthcare Negligence Settlement Recovery Corp., as plaintiff, and each of the entities set forth on Exhibit A, as defendants.

Fees and Expenses. As you know, since the Original Engagement Letter our billing rates have increased and at the present time hourly rates range from \$360 to \$500 for legal assistants, \$500 to \$930 for associates and counsel, and \$980 to \$1,415 for partners. Larry Halperin's and David Audley's billing rate is \$1,415 per hour.

Terms. The other terms and conditions set forth in the Original Engagement Letter shall be incorporated into this letter as if set forth herein.

Governing Law. This Supplemental Letter shall be governed by the laws of the State of New York and may be executed in counterparts.

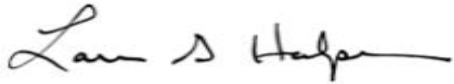
CHAPMAN
Focused on Finance

James D. Decker
May 24, 2024
Page 2

If this letter accurately reflects our agreement to represent Client in this matter, please sign this letter and return it to me. We look forward to continuing to represent you.

Sincerely yours,

CHAPMAN AND CUTLER LLP

By: 

Name: Larry G. Halperin

Title: Partner

Agreed as of the 24th day of May, 2024:



JAMES D. DECKER

EXHIBIT A

DEFENDANTS

5405 BABCOCK STREET OPERATIONS, LLC
EPSILON HEALTH CARE PROPERTIES, LLC
CMC II, LLC
LAVIE CARE CENTERS, LLC
6700 N.W. 10TH PLACE OPERATIONS, LLC
4200 WASHINGTON STREET OPERATIONS, LLC
2826 CLEVELAND AVENUE OPERATIONS, LLC
BAY A NURSING AND REHABILITATION, LLC
1465 OAKFIELD DRIVE OPERATIONS, LLC
777 NINTH STREET NORTH OPERATIONS, LLC
3101 GINGER DRIVE OPERATIONS, LLC
TALLAHASSEE FACILITY OPERATIONS, LLC
JOSERA, LLC
TOSTURI, LLC
MELBOURNE FACILITY OPERATIONS, LLC
NORTH FORT MYERS FACILITY OPERATIONS, LLC
CONSULATE FACILITY LEASING, LLC
1010 CARPENTERS WAY OPERATIONS, LLC
MIAMI FACILITY OPERATIONS, LLC
741 SOUTH BENEVA ROAD OPERATIONS, LLC
3735 EVANS AVENUE OPERATIONS, LLC
7950 LAKE UNDERHILL ROAD OPERATIONS, LLC
518 WEST FLETCHER AVENUE OPERATIONS, LLC
LIDENSKAB LLC
JACKSONVILLE FACILITY OPERATIONS, LLC
3001 PALM COAST PARKWAY OPERATIONS, LLC
KISSIMMEE FACILITY OPERATIONS, LLC
9311 SOUTH ORANGE BLOSSOM TRAIL OPERATIONS, LLC
4641 OLD CANOE CREEK ROAD OPERATIONS, LLC
2333 NORTH BRENTWOOD CIRCLE OPERATIONS, LLC
710 NORTH SUN DRIVE OPERATIONS, LLC
1851 ELKCAM BOULEVARD OPERATIONS, LLC
6414 13TH ROAD SOUTH OPERATIONS, LLC
1120 WEST DONEGAN AVENUE OPERATIONS, LLC
12170 CORTEZ BOULEVARD OPERATIONS, LLC
9400 SW 137TH AVENUE OPERATIONS LLC
NSPRMC, LLC
1550 JESS PARRISH COURT OPERATIONS, LLC
LV CHC HOLDINGS I, LLC
CONCOURSE PARTNERS, LLC
CONCURRENT PARTNERS, LLLP
PORT CHARLOTTE FACILITY OPERATIONS, LLC

WEST ALTAMONTE FACILITY OPERATIONS, LLC
216 SANTA BARBARA BOULEY ARD OPERATIONS, LLC
FLORIDIAN FACILITY OPERATIONS, LLC
1615 MIAMI ROAD OPERATIONS, LLC
6305 CORTEZ ROAD WEST OPERATIONS, LLC
15204 WEST COLONIAL DRIVE OPERATIONS, LLC
NEW PORT RICHEY FACILITY OPERATIONS, LLC
11565 HARTS ROAD OPERATIONS, LLC
BRANDON FACILITY OPERATIONS, LLC
9355 SAN JOSE BOULEY ARD OPERATIONS, LLC
702 SOUTH KINGS AVENUE OPERATIONS, LLC
ORANGE PARK FACILITY OPERATIONS, LLC
SYNERGY HEALTHCARE SERVICES, INC.
NSPIRE HEALTHCARE INC.
ASPIRE HEALTHCARE, LLC
DANIEL E. DIAS, ESQUIRE