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

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In re:)	Chapter 11
LAVIE CARE CENTERS, LLC, et al. 1)	Case No. 24-55507 (PMB)
Debtors.)	(Jointly Administered)
)	Related to Docket Nos. 4, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 42, 44, 45, 46, 47, 48, 49, 50, 51, 55, 104, 123, 127, 131, 132, 133

NOTICE OF DEBTORS' WITNESS AND EXHIBIT LIST FOR HEARING ON JUNE 27, 2024 AT 9:30 A.M. (ET)

LaVie Care Centers, LLC ("<u>LaVie</u>") and certain of its affiliates and subsidiaries, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the "<u>Debtors</u>") hereby submit the following witness and exhibit list (the "<u>Witness and Exhibit List</u>") for the hearing currently scheduled for June 27, 2024 at 9:30 a.m. (prevailing Eastern Time) (the "<u>Second-Day Hearing</u>").

WITNESS & EXHIBIT LIST

I. Witnesses Who May be Called to Testify

A. M. Benjamin Jones

Mr. Jones is the Debtors' Chief Restructuring Officer. The Debtors anticipate that Mr. Jones may provide direct testimony at the hearing and that he may be cross-examined by parties filing objections to the Debtors' requested relief. Mr. Jones will be testifying in person in the courtroom at the Second-Day Hearing in Atlanta, Georgia.

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.



B. Michael Krakovsky

Mr. Krakovsky is the Debtors' proposed investment banker. Mr. Krakovsky's direct testimony has been presented by the Debtors through the *Declaration of Michael Krakovsky in Support of Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Parties, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. 16]. Mr. Krakovsky will be available for cross examination at the Second-Day Hearing. Mr. Krakovsky will be testifying from his home in Park City, Utah.*

C. Any and all witnesses submitted or called by any other parties in this matter.

II. Exhibits

- A. Declaration of Michael Krakovsky in Support of Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Parties, (III) Modifying the Automatic Stay, (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. 16]
- B. Declaration of M. Benjamin Jones in Support of Chapter 11 Petitions and First Day Pleadings [Docket No. 17]
- C. Final Order (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Utilize Cash Collateral, (II) Granting Adequate Protection to Prepetition Secured Parties, (III) Modifying the Automatic Stay, and (IV) Granting Related Relief
- D. DIP Budget
- E. Any and all exhibits submitted or listed by any other parties or any exhibit needed to establish foundation, impeach or refresh the recollection of a witness, or rebut testimony provided by any witness.

RESERVATION OF RIGHTS

The Debtors reserve the right to (i) supplement and/or revise the Witness and Exhibit List as appropriate in advance of the Second-Day Hearing; (ii) call any witness or submit any exhibit identified by any party in advance of or at the Second-Day Hearing; and (iii) call any witness at the Second-Day Hearing that is not included on any witness list for purposes of impeachment or rebuttal.

Dated: Atlanta, Georgia June 26, 2024

MCDERMOTT WILL & EMERY LLP

/s/ Daniel M. Simon

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