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

In re:

LAVIE CARE CENTERS, LLC, et al.¹

Chapter 11

Case No. 24-55507 (PMB)

Debtors.

(Jointly Administered)

DEBTORS' MOTION FOR ENTRY OF ORDER AUTHORIZING ELECTRONIC EQUIPMENT IN THE COURTROOM

LaVie Care Centers, LLC ("LaVie") and certain of its affiliates and subsidiaries, as debtors and debtors-in-possession (collectively, the "Debtors") in the above-captioned chapter 11 cases (collectively, the "Chapter 11 Cases"), hereby move (this "Motion") pursuant to Rule 5073-1 of the Local Rules of Bankruptcy Procedure for the United States Bankruptcy Court for the Northern District of Georgia for entry of an order, substantially in the form attached hereto as Exhibit A (the "Proposed Order"), authorizing (i) their counsel, Emily C. Keil, Jack G. Haake, R. Jacob Jumbeck, and Catherine T. Lee of McDermott Will & Emery LLP (all having been admitted pro hac vice in these Chapter 11 Cases); (ii) their chief restructuring officer, M. Benjamin Jones of Ankura Consulting Group, LLC; (iii) additional representatives of their financial advisor, Ankura Consulting Group, LLC, including Rohid Ahmed, Russell Perry, and Alan Dalsass; (iv) representatives of their investment banker, Stout Capital, LLC, including Michael Krakovsky and Andrew Masotta; and (v) their independent manager, James Decker, and his counsel, Larry Halperin of Chapman and Culter LLP, to bring electronic equipment into the courtroom for use

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.



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during hearings in the Chapter 11 Cases before the Honorable Paul M. Baisier. Specifically, the Debtors request that each of the foregoing persons be allowed to bring one cell phone and one laptop or tablet computer (the "<u>Equipment</u>") into the courtroom. The Debtors respectfully request that this authorization begin on **Thursday**, **June 27**, **2024** and **continue until completion of the Chapter 11 Cases**.

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WHEREFORE, the Debtors respectfully request entry of the Proposed Order, substantially in the form attached hereto as <u>Exhibit A</u>, granting the relief requested herein and granting such other relief as is just and proper.

Dated: Atlanta, Georgia June 26, 2024

MCDERMOTT WILL & EMERY LLP

<u>/s/ Daniel M. Simon</u> 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

Proposed Counsel for the Debtors and Debtors-in-Possession

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CERTIFICATE OF SERVICE

I hereby certify that on June 26, 2024, all ECF participants registered in this case were served electronically with the *Debtors' Motion for Entry of Order Authorizing Electronic Equipment in the Courtroom* through the Court's ECF system at their respective email addresses

registered with this Court.

Dated: Atlanta, Georgia June 26, 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

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

In re:

LAVIE CARE CENTERS, LLC, et al.¹

Debtors.

Chapter 11

Case No. 24-55507 (PMB)

(Jointly Administered)

Related to Docket No.

ORDER AUTHORIZING ELECTRONIC EQUIPMENT IN THE COURTROOM

Upon the motion (the "<u>Motion</u>")² of the debtors and debtors-in-possession (collectively, the "<u>Debtors</u>") in the above-captioned chapter 11 cases (the "<u>Chapter 11 Cases</u>") for entry of an order (this "<u>Order</u>") authorizing certain individuals to bring electronic equipment into the courtroom in these Chapter 11 Cases, it is hereby

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 that are not otherwise defined herein have the meanings ascribed to them in the Motion.

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ORDERED that (i) counsel for the Debtors, Emily C. Keil, Jack G. Haake, R. Jacob Jumbeck, and Catherine T. Lee of McDermott Will & Emery LLP (all having been admitted pro hac vice in the Chapter 11 Cases); (ii) the Debtors' chief restructuring officer, M. Benjamin Jones of Ankura Consulting Group, LLC; (iii) additional representatives of the Debtors' financial advisor, Ankura Consulting Group, LLC, including Rohid Ahmed, Russell Perry, and Alan Dalsass; (iv) representatives of the Debtors' investment banker, Stout Capital, LLC, including Michael Krakovsky and Andrew Masotta; and (v) the Debtors' independent manager, James Decker, and his counsel, Larry Halperin of Chapman and Culter LLP, may each bring one cell phone and one laptop or tablet computer (together, the "Equipment") to either or both of (a) Courtroom 1202, Richard B. Russell Federal Building & U.S. Courthouse, 75 Ted Turner Driver, SW Atlanta, Georgia 30303 and (b) the 2nd Floor Courtroom, 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 of the Court is directed to serve a copy of this Order upon counsel for the Debtors, the United States Trustee, and the United States Marshal's Office.

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

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DISTRIBUTION LIST

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