

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. 4, 7, 8, 9, 10, 11, 12,
)	13, 14, 15, 16, 42, 44, 45, 46, 47, 48, 49, 50,
)	51, 55, 104, 123, 127, 131, 132, 133

**NOTICE OF AMENDED² AGENDA OF MATTERS SCHEDULED FOR HEARING
ON JUNE 27, 2024 AT 9:30 A.M. (ET)**

Time and Date of Hearing: June 27, 2024 at 9:30 a.m. (prevailing Eastern Time)

Location of In-Person Hearing: The Honorable Paul M. Baisier
United States Bankruptcy Court for the
Northern District of Georgia
Richard B. Russell Federal Building and
United States Courthouse
Courtroom 1202
75 Ted Turner Drive, SW
Atlanta, GA 30303

Location of Virtual Hearing: Parties participating in the hearing virtually may do so
by using the following link:

<https://www.zoomgov.com/j/1617069079?pwd=WG16TGpyM1Z6dFZ6YVlrUkZwQ2RiZz09>

Phone Number: 833-568-8864
Meeting ID: 161 706 9079

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 **Amended items appear in bold.**



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Copies of Pleadings:

A copy of each pleading referenced herein can be viewed on the Court's website at www.ganb.uscourts.gov and the website of the Debtors' claims and noticing agent, Kurtzman Carson Consultants LLC, at <https://www.kccllc.net/LaVie>. Further information may be obtained by using the "Submit an Inquiry" function at <https://www.kccllc.net/LaVie/inquiry>.

I. Adjourned Matters

- A. *Insurance Motion.*** Debtors' Emergency Motion for Entry of Interim and Final Orders Authorizing Debtors to (I) Maintain Existing Insurance Policies and Surety Bonds and Pay Obligations Arising Thereunder; (II) Renew, Revise, Extend, Supplement, Change, or Enter Into New Insurance Policies and Surety Bonds; and (III) Granting Related Relief [Docket No. 10]

Response Deadline: June 21, 2024 at 4:00 p.m. (prevailing Eastern Time). Extended to June 24, 2024 at 4:00 p.m. (prevailing Eastern Time) for the Committee and for Chubb Insurance Company.

Responses Filed:

1. Omnibus Response of the Official Committee of Unsecured Creditors to Certain of the Debtors' First Day Motions [Docket No. 133]
2. **Debtors' Omnibus Reply to the Committee's First-Day Objections [Docket No. 164]**

Related Documents:

1. Interim Order Authorizing Debtors to (I) Maintain Existing Insurance Policies and Surety Bonds and Pay Obligations Arising Thereunder; (II) Renew, Revise, Extend, Supplement, Change, or Enter Into New Insurance Policies and Surety Bonds; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [Docket No. 47]
2. Certificate of Service of Interim Order [Docket No. 88]

Status: **This matter is being adjourned until the hearing scheduled on July 10, 2024 at 9:30 a.m. (prevailing Eastern Time).**

- B. *Taxes Motion.*** Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing Debtors to Pay Certain Prepetition Taxes, Fees, and Related Obligations and (II) Granting Related Relief [Docket No. 11]

Response Deadline: June 21, 2024 at 4:00 p.m. (prevailing Eastern Time). Extended to June 24, 2024 at 4:00 p.m. (prevailing Eastern Time) for the Committee.

Responses Filed:

1. Omnibus Response of the Official Committee of Unsecured Creditors to Certain of the Debtors' First Day Motions [Docket No. 133]
2. **Debtors' Omnibus Reply to the Committee's First-Day Objections [Docket No. 164]**

Related Documents:

1. Interim Order (I) Authorizing Debtors to Pay Certain Prepetition Taxes, Fees, and Related Obligations, (II) Scheduling a Final Hearing, and (III) Granting Related Relief [Docket No. 45]
2. Certificate of Service of Interim Order [Docket No. 86]

Status: This matter is being adjourned until the hearing scheduled on July 10, 2024 at 9:30 a.m. (prevailing Eastern Time).

- C. ***Cash Management Motion.*** Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Continue to Operate Their Existing Cash Management System, (B) Maintain Existing Bank Accounts and Business Forms and Honor Certain Prepetition Obligations Related to the Use Thereof, (C) Maintain Purchasing Card Program and Honor Prepetition Obligations Related Thereto, and (D) Continue to Perform Intercompany Transactions; (II) Extending the Time for the Debtors to Comply with 11 U.S.C. § 345(b) Deposit and Investment Requirements; and (III) Granting Related Relief [Docket No. 14]

Response Deadline: June 21, 2024 at 4:00 p.m. (prevailing Eastern Time). Extended to June 24, 2024 at 4:00 p.m. (prevailing Eastern Time) for the Committee.

Responses Filed:

1. Omnibus Response of the Official Committee of Unsecured Creditors to Certain of the Debtors' First Day Motions [Docket No. 133]
2. **Debtors' Omnibus Reply to the Committee's First-Day Objections [Docket No. 164]**

Related Documents:

1. Interim Order (I) Authorizing the Debtors to (A) Continue to Operate Their Existing Cash Management System, (B) Maintain Existing Bank Accounts

and Business Forms and Honor Certain Prepetition Obligations Related to the Use Thereof, (C) Maintain Purchasing Card Program and Honor Prepetition Obligations Related Thereto, and (D) Continue to Perform Intercompany Transactions; (II) Extending the Time for the Debtors to Comply with 11 U.S.C. § 345(b) Deposit and Investment Requirements; (III) Scheduling a Final Hearing; and (IV) Granting Related Relief [Docket No. 48]

2. Certificate of Service of Interim Order [Docket No. 89]

Status: This matter is being adjourned until the hearing scheduled on July 10, 2024 at 9:30 a.m. (prevailing Eastern Time).

II. Uncontested Matters Going Forward

- D. Consolidated Creditor Motion.** Debtors' Emergency Motion for Entry of Order (I) Authorizing the Debtors to (A) Prepare a List of Creditors in Lieu of Submitting a Formatted Mailing Matrix and (B) File a Consolidated List of the Debtors' 30 Largest Unsecured Creditors, (II) Authorizing the Debtors to Redact Certain Personal Identification Information for Individual Creditors, (III) Approving the Form and Manner of Notifying Creditors of Commencement of these Chapter 11 Cases, and (IV) Authorizing the Debtors to File Their Monthly Operating Reports on a Consolidated Basis [Docket No. 4]

Response Deadline: June 21, 2024 at 4:00 p.m. (prevailing Eastern Time). Extended to June 24, 2024 at 4:00 p.m. (prevailing Eastern Time) for the Official Committee of Unsecured Creditors (the "Committee").

Responses Filed: None.

Related Documents:

1. Interim Order (I) Authorizing the Debtors to (A) Prepare a List of Creditors in Lieu of Submitting a Formatted Mailing Matrix and (B) File a Consolidated List of the Debtors' 30 Largest Unsecured Creditors, (II) Authorizing the Debtors to Redact Certain Personal Identification Information for Individual Creditors, (III) Approving the Form and Manner of Notifying Creditors of Commencement of these Chapter 11 Cases, and (IV) Scheduling a Final Hearing, and (V) Granting Related Relief [Docket No. 42]
2. Certificate of Service of Interim Order [Docket No. 84]
3. **Notice of Filing of Modified Proposed Final Order (I) Authorizing the Debtors to (A) Prepare a List of Creditors in Lieu of Submitting a Formatted Mailing Matrix and (B) File a Consolidated List of the**

Debtors' 30 Largest Unsecured Creditors, (II) Authorizing the Debtors to Redact Certain Personal Identification Information for Individual Creditors, (III) Authorizing the Debtors to File Their Monthly Operating Reports on a Consolidated Basis, and (IV) Granting Related Relief [Docket No. 166]

Status: The Debtors have resolved informal comments from the Office of the United States Trustee and intend to present a revised form of Order at the hearing.

- E. ***Resident Confidentiality Motion.*** Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Implementation of Procedures to Maintain and Protect Confidential Health Information as Required by Applicable Privacy Rules and (II) Granting Related Relief [Docket No. 7]

Response Deadline: June 21, 2024 at 4:00 p.m. (prevailing Eastern Time). Extended to June 24, 2024 at 4:00 p.m. (prevailing Eastern Time) for the Committee.

Responses Filed: None.

Related Documents:

1. Interim Order (I) Authorizing the Implementation of Procedures to Maintain and Protect Confidential Health Information as Required by Applicable Privacy Rules, (II) Scheduling a Final Hearing, and (III) Granting Related Relief [Docket No. 44]
2. Certificate of Service of Interim Order [Docket No. 85]
3. **Notice of Filing of Modified Proposed Final Order (I) Authorizing the Implementation of Procedures to Maintain and Protect Confidential Health Information as Required by Applicable Privacy Rules and (II) Granting Related Relief [Docket No. 154]**

Status: This matter is going forward on an uncontested basis.

- F. ***Resident Care Vendor Motion.*** Debtors' Emergency Motion for Entry of Interim and Final Orders Authorizing Payment of Prepetition Obligations Owed to Resident Care Vendors [Docket No. 9]

Response Deadline: June 21, 2024 at 4:00 p.m. (prevailing Eastern Time). Extended to June 24, 2024 at 4:00 p.m. (prevailing Eastern Time) for the Committee.

Responses Filed: None.

Related Documents:

1. Interim Order (I) Authorizing Payment of Prepetition Obligations Owed to Resident Care Vendors, (II) Scheduling a Final Hearing, and (III) Granting Related Relief [Docket No. 55]
2. Certificate of Service of Interim Order [Docket No. 93]
3. **Notice of Filing of Modified Proposed Final Order (I) Authorizing Payment of Prepetition Obligations Owed to Resident Care Vendors and (II) Granting Related Relief [Docket No. 161]**

Status: This matter is going forward on an uncontested basis.

- G. *Utilities Motion.*** Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Approving the Debtors' Proposed Form of Adequate Assurance of Payment; (II) Establishing Procedures for Resolving Objections by Utility Providers; and (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service [Docket No. 12]

Response Deadline: June 21, 2024 at 4:00 p.m. (prevailing Eastern Time). Extended to June 24, 2024 at 4:00 p.m. (prevailing Eastern Time) for the Committee.

Responses Filed:

1. Objection of Certain Utility Companies to the Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Approving the Debtors' Proposed Form of Adequate Assurance of Payment; (II) Establishing Procedures for Resolving Objections by Utility Providers; and (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service [Docket No. 123]
2. Notice of Withdrawal of Objection of Certain Utility Companies to the Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Approving the Debtors' Proposed Form of Adequate Assurance of Payment; (II) Establishing Procedures for Resolving Objections by Utility Providers; and (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service [Docket No. 127]

Related Documents:

1. Interim Order (I) Approving the Debtors' Proposed Form of Adequate Assurance of Payment; (II) Establishing Procedures for Resolving Objections by Utility Providers; (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service; (IV) Scheduling a Final Hearing; and (V) Granting Related Relief [Docket No. 51]
2. Certificate of Service of Interim Order [Docket No. 92]

3. **Notice of Filing of Modified Proposed Final Order (I) Approving the Debtors' Proposed Form of Adequate Assurance of Payment; (II) Establishing Procedures for Resolving Objections by Utility Providers; (III) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service; and (IV) Granting Related Relief [Docket No. 160]**

Status: This matter is going forward on an uncontested basis.

- H. *Wages & Benefits Motion.*** Debtors' Emergency Motion for Entry of Interim and Final Orders Authorizing Debtors to (I) Pay Prepetition Wages, Compensation, and Employee Benefits, (II) Continue Certain Employee Benefit Programs in the Ordinary Course, and (III) Granting Related Relief [Docket No. 13]

Response Deadline: June 21, 2024 at 4:00 p.m. (prevailing Eastern Time). Extended to June 24, 2024 at 4:00 p.m. (prevailing Eastern Time) for Committee.

Responses Filed: None.

Related Documents:

1. Interim Order (I) Pay Prepetition Wages, Compensation, and Employee Benefits, (II) Continue Certain Employee Benefit Programs in the Ordinary Course, (III) Scheduling a Final Hearing, and (IV) Granting Related Relief [Docket No. 46]
2. Certificate of Service of Interim Order [Docket No. 87]
3. **Notice of Filing of Modified Proposed Final Order (I) Pay Prepetition Wages, Compensation, and Employee Benefits, (II) Continue Certain Employee Benefit Programs in the Ordinary Course, and (III) Granting Related Relief [Docket No. 156]**

Status: This matter is going forward on an uncontested basis.

III. Contested Matters

- I. *Resident Programs Motion.*** Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to Maintain and Continue Resident Programs and Honor Prepetition Obligations Related Thereto, and (II) Granting Related Relief [Docket No. 8]

Response Deadline: June 21, 2024 at 4:00 p.m. (prevailing Eastern Time). Extended to June 24, 2024 at 4:00 p.m. (prevailing Eastern Time) for the Committee.

Responses Filed:

1. Omnibus Response of the Official Committee of Unsecured Creditors to Certain of the Debtors' First Day Motions [Docket No. 133]
2. **Debtors' Omnibus Reply to the Committee's First-Day Objections [Docket No. 164]**

Related Documents:

1. Interim Order (I) Authorizing the Debtors to Maintain and Continue Resident Programs and Honor Prepetition Obligations Related Thereto, (II) Scheduling a Final Hearing, and (III) Granting Related Relief [Docket No. 50]
2. Certificate of Service of Interim Order [Docket No. 91]
3. **Notice of Filing of Modified Proposed Final Order (I) Authorizing the Debtors to Maintain and Continue Resident Programs and Honor Prepetition Obligations Related Thereto and (II) Granting Related Relief [Docket No. 155]**

Status: This matter is going forward.

- J. *DIP Motion.*** 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. 15]

Response Deadline: June 21, 2024 at 4:00 p.m. (prevailing Eastern Time). Extended to June 24, 2024 at 4:00 p.m. (prevailing Eastern Time) for Committee. Extended to June 25, 2024 at 4:00 p.m. (prevailing Eastern Time) for the United States Department of Justice. Extended to June 26, 2024 at 4:00 p.m. (prevailing Eastern Time) for Lument Real Estate Capital, LLC.

Responses Filed:

1. Objection of the Official Committee of Unsecured Creditors to the 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. 131]
2. **Debtors' Omnibus Reply to the Committee's First-Day Objections [Docket No. 164]**

3. DIP Lenders' Joinder to Debtors' Omnibus Reply to the Committee's First-Day Objections [Docket No. 165]

Related Documents:

1. 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]
2. Interim 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, (IV) Scheduling a Final Hearing for June 27, 2024, and (V) Granting Related Relief [Docket No. 49]
3. Certificate of Service of Interim Order [Docket No. 90]
4. **Notice of Filing of Proposed 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**

Status: This matter is going forward.

- K. *Bid Procedures Motion.*** Debtors' Motion for Entry of an Order (I) Approving Bidding Procedures and Bid Protections, (II) Scheduling Certain Dates and Deadlines with Respect Thereto, (III) Approving the Form and Manner of Notice Thereof, (IV) Establishing Notice and Procedures for the Assumption and Assignment of Contracts and Leases, (V) Authorizing the Assumption and Assignment of Assumed Contracts, and (VI) Authorizing the Sale of Assets [Docket No. 104]

Response Deadline: June 24, 2024 at 4:00 p.m. (prevailing Eastern Time). Extended to June 25, 2024 at 12:00 p.m. (prevailing Eastern Time) for Cigna.

Responses Filed:

1. Limited Objection and Reservation of Rights of the Official Committee of Unsecured Creditors to Debtors' Motion for Entry of an Order (I) Approving Bidding Procedures and Bid Protections, (II) Scheduling Certain Dates and Deadlines with Respect Thereto, (III) Approving the Form and Manner of Notice Thereof, (IV) Establishing Notice and Procedures for the Assumption and Assignment of Contracts and Leases, (V) Authorizing the

Assumption and Assignment of Assumed Contracts, and (VI) Authorizing the Sale of Assets [Docket No. 132]

2. **Debtors' Omnibus Reply to the Committee's First-Day Objections [Docket No. 164]**

Related Documents:

1. Certificate of Service [Docket No. 115]
2. **Notice of Filing of Modified Proposed Order (I) Approving Bidding Procedures and Bid Protections, (II) Scheduling Certain Dates and Deadlines with Respect Thereto, (III) Approving the Form and Manner of Notice Thereof, (IV) Establishing Notice and Procedures for the Assumption and Assignment of Contracts and Leases, (V) Authorizing the Assumption and Assignment of Assumed Contracts, and (VI) Authorizing the Sale of Assets [Docket No. 163]**

Status: This matter is going forward.

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Dated: Atlanta, Georgia
June 26, 2024

MCDERMOTT WILL & EMERY LLP

/s/ Daniel M. Simon

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Debtors-in-Possession*