

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

In re	:	CHAPTER 11
LAVIE CARE CENTERS, LLC, <i>et al.</i> ,	:	CASE NO. 24-55507-pmb
Debtors.	:	JOINTLY ADMINISTERED

**NOTICE OF WITNESS AND EXHIBIT LIST OF OFFICIAL COMMITTEE OF
UNSECURED CREDITORS FOR JUNE 27, 2024 HEARING**

The Official Committee of Unsecured Creditors (the “Committee”), through its undersigned attorneys, hereby submits its Witness and Exhibit List for the hearing to be held on June 27, 2024 at 9:30 a.m. (Eastern Time) in the above-captioned cases.

WITNESSES

The Committee may call the following witnesses:

1. M. Benjamin Jones

Mr. Jones is the Debtors’ Chief Restructuring Officer. The Committee anticipates 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.

2. Any witness endorsed or disclosed by any other parties.

3. Any witness necessary for impeachment, rebuttal, to authenticate or to lay a foundation for the admissions of evidence.

4. The Committee reserves the right to cross examine any witness called by any other Party.



EXHIBITS

The Committee may introduce the following exhibits:

EXHIBIT	DESCRIPTION
OCUC-1	Initial DIP Budget Key Assumptions
OCUC-2	Administrative Transition Services Agreement between LaVie Care Centers, LLC and POURLESSOINS, LLC, dated as of May 3, 2024
OCUC-3	Declaration of M. Benjamin Jones in Support of Chapter 11 Petitions and First Day Pleadings (Docket No. 17)
OCUC-4	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)
OCUC-5	Intercreditor and Lien Subordination Agreement, dated as of November 30, 2021
OCUC-6	Security Agreement, dated as of November 30, 2021
OCUC-7	Order Approving Settlement Agreement Between and Among the Debtors, CPSTN Operations, LLC, the United States of America, the Relator, and the Non-Debtor Affiliates, filed in <i>In re CMC II. LLC, et al.</i> , US Bankruptcy Court for the District of Delaware Case No. 21-10461 (JTD) [Docket No. 591]
OCUC-8	Order Approving Settlement Agreement Between and Among the Debtors, CPSTN Operations, LLC, the Non-Debtor Affiliates, and the Official Committee of Unsecured Creditors, filed in <i>In re CMC II. LLC, et al.</i> , US Bankruptcy Court for the District of Delaware Case No. 21-10461 (JTD) [Docket No. 592]
OCUC-9	Guaranty Agreement, dated as of November 30, 2021
OCUC-10	Guaranty Agreement, dated as of November 30, 2021
OCUC-11	Guaranty Agreement, dated as of November 30, 2021
OCUC-12	Guaranty Agreement, dated as of November 30, 2021
	Any document or pleading filed in the above-captioned main case.
	Any exhibit necessary for impeachment and/or rebuttal purposes.

	Any exhibit identified or offered by any other party.
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RESERVATION OF RIGHTS

The Committee reserves the right to call or to introduce one or more, or none, of the witnesses and exhibits listed above, and further reserves the right to supplement this list prior to the Hearing.

Dated: June 27, 2024

TROUTMAN PEPPER HAMILTON SANDERS LLP

/s/ Pierce E. Rigney

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*Proposed Counsel for the Official Committee of
Unsecured Creditors*

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CERTIFICATE OF SERVICE

I hereby certify that on June 27, 2024, all ECF participants registered in this case were served electronically with the *Notice of Witness and Exhibit List of Official Committee of Unsecured Creditors for June 27, 2024 Hearing* (the “Witness and Exhibit List”) through the Court’s ECF system at their respective email addresses registered with the Court.

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