

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

In re:)	
)	Chapter 11
LAVIE CARE CENTERS, LLC, <i>et al.</i> ,)	Case No. 24-55507 (PMB)
Debtors. ¹)	(Jointly Administered)
)	
LAVIE CARE CENTERS, LLC; 1010 CARPENTERS WAY OPERATIONS LLC; 1120 WEST DONEGAN AVENUE OPERATIONS LLC; 11565 HARTS ROAD OPERATIONS LLC; 12170 CORTEZ BOULEVARD OPERATIONS LLC; 1465 OAKFIELD DRIVE OPERATIONS LLC; 15204 WEST COLONIAL DRIVE OPERATIONS LLC; 1550 JESS PARRISH COURT OPERATIONS LLC; 1615 MIAMI ROAD OPERATIONS LLC; 1851 ELKCAM BOULEVARD OPERATIONS LLC; 216 SANTA BARBARA BOULEVARD OPERATIONS LLC; 2333 NORTH BRENTWOOD CIRCLE OPERATIONS LLC; 2826 CLEVELAND AVENUE OPERATIONS LLC; 3001 PALM COAST PARKWAY OPERATIONS LLC; 3101 GINGER DRIVE OPERATIONS LLC; 3735 EVANS AVENUE OPERATIONS LLC; 4200 WASHINGTON STREET OPERATIONS LLC; 4641 OLD CANOE CREEK ROAD OPERATIONS LLC; 518 WEST FLETCHER AVENUE OPERATIONS LLC; 5405 BABCOCK STREET OPERATIONS LLC; 6305 CORTEZ ROAD WEST OPERATIONS LLC; 6414 13TH ROAD SOUTH OPERATIONS LLC; 6700 NW 10TH PLACE OPERATIONS LLC; 702 SOUTH KINGS AVENUE OPERATIONS LLC; 710 NORTH SUN DRIVE OPERATIONS LLC; 741 SOUTH BENEVA ROAD OPERATIONS LLC; 777 NINTH STREET NORTH OPERATIONS LLC; 7950 LAKE UNDERHILL ROAD OPERATIONS LLC; 9311)	Adv. Proc. No. 24-05127 (PMB) Related to Adv. Docket Nos. 1, 2, 3, 10

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.veritaglobal.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.



SOUTH ORANGE BLOSSOM TRAIL)
OPERATIONS LLC; 9355 SAN JOSE BOULEVARD)
OPERATIONS LLC; BAYA NURSING AND)
REHABILITATION, LLC; BRANDON FACILITY)
OPERATIONS, LLC; CONSULATE FACILITY)
LEASING, LLC; EPSILON HEALTH CARE)
PROPERTIES, LLC; FLORIDIAN FACILITY)
OPERATIONS, LLC; JACKSONVILLE FACILITY)
OPERATIONS, LLC; JOSERA, LLC; KISSIMMEE)
FACILITY OPERATIONS, LLC; LIDENSKAB, LLC;)
LV CHC HOLDINGS I, LLC; MELBOURNE)
FACILITY OPERATIONS, LLC; MIAMI FACILITY)
OPERATIONS, LLC; NEW PORT RICHEY)
FACILITY OPERATIONS, LLC; NORTH FORT)
MYERS FACILITY OPERATIONS, LLC; ORANGE)
PARK FACILITY OPERATIONS, LLC; PORT)
CHARLOTTE FACILITY OPERATIONS, LLC;)
TALLAHASSEE FACILITY OPERATIONS, LLC;)
TOSTURI, LLC; AND WEST ALTAMONTE)
FACILITY OPERATIONS, LLC;)

Plaintiffs,)

v.)

HEALTHCARE NEGLIGENCE SETTLEMENT)
RECOVERY CORP.)

Defendant.)

**NOTICE OF DEBTORS' WITNESS AND EXHIBIT
LIST FOR HEARING ON JULY 24, 2024 AT 9:30 A.M. (ET)**

LaVie Care Centers, LLC (“LaVie”) and certain of its affiliates and subsidiaries, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the “Debtors”) hereby submit the following witness and exhibit list (the “Witness and Exhibit List”) for the hearing currently scheduled for July 24, 2024 at 9:30 a.m. (prevailing Eastern Time) (the “Hearing”).

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 they may submit into evidence the Jones Declaration (as defined below), subject to cross-examination. To the extent necessary, Mr. Jones will be testifying in person in the courtroom at the Hearing in Atlanta, Georgia.

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

II. Exhibits

A. Declaration of M. Benjamin Jones in Support of Debtors' Motion for Entry of Order (I) Extending the Automatic Stay and/or Preliminarily Enjoining Claims and Causes of Action Against Non-Debtor Defendants and (II) Expedition [Ex. A to Adv. Docket No. 1] (the "Jones Declaration")

B. Complaint filed by Healthcare Negligence Settlement Recovery Corp., attached as Exhibit 1 to Jones Declaration

C. LVCC Operating Agreement, attached as Exhibit 2 to Jones Declaration

D. Support Services Agreement, attached as Exhibit 3 to Jones Declaration

E. Josera Administrative Services Agreement, attached as Exhibit 4-A to Jones Declaration

F. Lidenskab Administrative Services Agreement, attached as Exhibit 4-B to Jones Declaration

G. SNF Operations Transfer Agreement, attached as Exhibit 5 to Jones Declaration

H. 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 Hearing; (ii) call any witness or submit any exhibit identified by any party

in advance of or at the Hearing; and (iii) call any witness at the Hearing that is not included on any witness list for purposes of impeachment or rebuttal.

Dated: Atlanta, Georgia
July 22, 2024

MCDERMOTT WILL & EMERY LLP

/s/ Daniel M. Simon

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- and -

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Counsel for the Debtors and Debtors-in-Possession

CERTIFICATE OF SERVICE

I hereby certify that on this date a true and correct copy of the foregoing 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 will be filing a supplemental certificate of service on the docket to reflect any additional service of the foregoing.

Dated: Atlanta, Georgia
July 22, 2024

MCDERMOTT WILL & EMERY LLP

/s/ Daniel M. Simon

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