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

In re:

LAVIE CARE CENTERS, LLC, et al.<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-55507 (PMB)

(Jointly Administered)

Obj. Deadline: Sept. 4, 2024 at 4:00 p.m. (ET) Hearing Date: Sept. 11, 2024 at 9:30 a.m. (ET)

## NOTICE OF HEARING AND DEADLINE TO OBJECT TO DEBTORS' MOTION FOR ENTRY OF ORDER (I) APPROVING DISCLOSURE STATEMENT, (II) SCHEDULING CONFIRMATION HEARING, (III) ESTABLISHING PROCEDURES FOR SOLICITATION AND TABULATION OF VOTES ON PLAN, (IV) APPROVING <u>CERTAIN FORMS AND NOTICES, AND (V) GRANTING RELATED RELIEF</u>

**PLEASE TAKE NOTICE THAT** on July 23, 2024, LaVie Care Centers, LLC ("<u>LaVie</u>") and certain of its affiliates and subsidiaries, as debtors and debtors-in-possession in the abovecaptioned chapter 11 cases (collectively, the "<u>Debtors</u>") filed the *Debtors' Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* [Docket No. 273] (the disclosure statement portion thereof, the "<u>Disclosure Statement</u>" and the chapter 11 plan portion thereof, the "<u>Plan</u>", including all exhibits thereto and as amended, supplemented or otherwise modified from time to time, and collectively, as may be amended, supplemented, or otherwise modified, the "<u>Combined</u> <u>Disclosure Statement and Plan</u>") with the United States Bankruptcy Court for the Northern District of Georgia (the "<u>Court</u>").

**PLEASE TAKE FURTHER NOTICE THAT** on August 7, 2024, the Debtors filed their *Motion for Entry of Order (I) Approving Disclosure Statement, (II) Scheduling Confirmation Hearing, (III) Establishing Procedures for Solicitation and Tabulation of Votes on Plan, (IV) Approving Certain Forms and Notices, and (V) Granting Related Relief [Docket No. 316] (the "<u>Motion</u>") with the Court, seeking, among other things, approval of the Disclosure Statement and various solicitation procedures with respect to soliciting votes to accept or reject the Combined Disclosure Statement and Plan.* 

<sup>&</sup>lt;sup>1</sup> 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 <a href="https://www.veritaglobal.net/LaVie">https://www.veritaglobal.net/LaVie</a>. 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.



PLEASE TAKE FURTHER NOTICE THAT if you object to the relief requested in the Motion, including the adequacy of the information contained in the Disclosure Statement, you must file your objection with the Bankruptcy Clerk at the United States Bankruptcy Court for the Northern District of Georgia, Atlanta Division, 75 Ted Turner Dr. SW, Room 1340, Atlanta, GA 30303 and serve a copy on (i) LaVie Care Centers, LLC, c/o Ankura Consulting Group, LLC, 485 Lexington Avenue, 10th Floor, New York, NY 10017 (Attn: M. Benjamin Jones); (ii) counsel to the Debtors, McDermott Will & Emery LLP, 1180 Peachtree St. NE, Suite 3350, Atlanta, Georgia 30309 (Attn: Daniel M. Simon) and 444 West Lake Street, Suite 4000, Chicago, IL 60606 (Attn: Emily C. Keil and Jake Jumbeck); (iii) counsel to the Committee, Troutman Pepper Hamilton Sanders LLP, 600 Peachtree St. NE, Suite 3000, Atlanta, GA 30308 (Attn: Matthew R. Brooks and Pierce E. Rigney) and 3000 Two Logan Square, Eighteenth and Arch St., Philadelphia, PA 19103 (Attn: Francis J. Lawall) and 875 Third Avenue, New York, NY 10022 (Attn: Deborah Kovsky-Apap); and (iv) the United States Trustee of the Northern District of Georgia, 362 Richard B. Russell Building, 75 Ted Turner Drive, S.W., Atlanta, GA 30303 (Attn: Jonathan S. Adams) by September 4, 2024 at 4:00 p.m. (prevailing Eastern Time) (the "Objection Deadline"). The response or objection must explain your position and be actually received by the Bankruptcy Clerk by the Objection Deadline. If you do not file a response or objection by the Objection Deadline, the Court may grant the relief requested in the Motion without further notice.

**PLEASE TAKE FURTHER NOTICE THAT** a hearing on the Motion has been scheduled for <u>September 11, 2024 at 9:30 a.m. (prevailing Eastern Time)</u> in <u>Courtroom 1202</u>, at the <u>Richard B. Russell Federal Building and United States Courthouse, 75 Ted Turner Dr.</u> <u>SW, Atlanta, Georgia 30303</u>, which may be attended in person or via the Court's Virtual Hearing Room. You may join the Virtual Hearing Room through the "Dial-in and Virtual Bankruptcy Hearing Information" link at the top of the homepage of the Court's website, <u>www.ganb.uscourts.gov</u>, or the link on the judge's webpage, which can also be found on the Court's website. Please also review the "Hearing Information" tab on the judge's webpage for further information about the hearing. You should be prepared to appear at the hearing via video, but you may leave your camera in the off position until the Court instructs otherwise. Unrepresented persons who do not have video capability may use the telephone dial-in information on the judge's webpage.

**PLEASE TAKE FURTHER NOTICE THAT** copies of the Motion, the Combined Disclosure Statement and Plan, and other related documents are available free of charge on the Debtors' case information website (<u>https://www.veritaglobal.net/lavie</u>) or can be requested from Kurtzman Carson Consultants, LLC d/b/a Verita by calling (877) 709-4750 (United States/Canada toll-free) or +1 (424) 236-7230 (International) or by clicking the "Submit an Inquiry" option at <u>https://www.veritaglobal.net/lavie/Inquiry</u>.

PLEASE TAKE FURTHER NOTICE THAT <u>your rights may be affected by the relief</u> <u>requested in the Motion</u>. You should read the Motion and the Combined Plan and Disclosure Statement carefully and discuss them with your attorney, if you have one in these bankruptcy cases. If you do not have an attorney, you may wish to consult one.

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Case 24-55507-pmb Doc 317 Filed 08/07/24 Entered 08/07/24 20:46:50 Desc Main Document Page 3 of 3

Dated: Atlanta, Georgia August 7, 2024

## **MCDERMOTT WILL & EMERY LLP**

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- and -

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