

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

IN RE: Case No.: 24-55507-PMB

LAVIE CARE CENTERS, LLC, et. Chapter 11
al.,

Cases Jointly Administered

Debtor.

RECOVERY CORP.’S MOTION TO COMPEL DISCOVERY RESPONSES

Pursuant to Federal Rule of Civil Procedure 37(a)(1), Federal Rules of Bankruptcy Procedure 7037 and 9014, Bankruptcy Local Rule 7037-1, and other applicable law, Healthcare Negligence Settlement Recovery Corp. (the “Recovery Corp.”), moves on the following grounds for the order of this Court compelling fifty (50) chapter 11 debtors (collectively, the “Florida DivestCo Debtors”)¹ whose

¹ 1010 Carpenters Way Operations LLC, 1120 West Donegan Avenue Operations LLC, 11565 Harts Road Operations LLC, 195 Mattie M. Kelly Boulevard 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 A venue Operations LLC, 3001 Palm Coast Parkway Operations LLC, 3101 Ginger Drive Operations LLC, 3735 Evans Avenue Operations LLC, 3920 Rosewood Way Operations, LLC, 4200 Washington Street Operations



reorganizations are jointly administered and pending before this Court (collectively, the “Jointly Administered Reorganizations”) under the lead debtor, parent entity of the remaining Debtors, LaVie Care Centers, LLC (the “Parent Debtor”), to fully comply with “Recovery Corp.’s First Set of Interrogatories to the Florida DivestCo Debtors Pertaining to Motion to Convert Florida DivestCo Reorganizations to Chapter 7 Liquidations” (the “Interrogatories”), a copy of which is attached hereto as Exhibit “A,” and “Recovery Corp.’s Request for Production to Florida DivestCo Debtors Pertaining to Motion to Convert Florida DivestCo Reorganizations to Chapter 7 Liquidations” (the “Production Request”), a copy of which is attached hereto as Exhibit “B”, both of which were served on the Florida DivestCo Debtors on August 6, 2024, and in support states as follows:

I. FACTUAL BACKGROUND

1. These Jointly Administered Reorganizations were filed by 282 chapter 11 debtors (collectively, the “Debtors”). However, only forty-three (43) of the

LLC, 4641 Old Canoe Creek Road Operations LLC, 518 West Fletcher A venue 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 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, Joseira, 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.

Debtors are operating business entities (collectively, the “OpCo Debtors”), and the rest are completely inactive, most being business entities that previously operated a business but transferred its business operations and assets (the “DivestCo Debtors”).

2. The Florida DivestCo Debtors are a set of non-operating Florida-based entities that divested their business operations prior to the initiation of these Jointly Administered Reorganizations.² The Debtors are not substantively consolidated and are not good candidates for substantive consolidation under prevailing law. However, the Debtors’ reorganization goals are predicated upon satisfying the debt of 282 Debtors from the sale of the businesses of OpCo Debtors. The catch for all involved is the Debtors’ expectation of a general release of all liabilities tied to the “divestiture” of the assets and/or businesses of all DivestCo Debtors, including the Florida DivestCo Debtors. Any claims relating to actionable transfer of operating assets a priori belong to DivestCo Debtors whose assets were transferred, not operating debtors whose assets are due to be sold in the context of these Reorganizations.

3. Recovery Corp. is a Florida corporation that holds one hundred (100) claims originally asserted by as many Florida-based claimants (collectively, the

² Of the fifty (50) Florida DivestCo Debtors referenced above, forty-three (43) of them unquestionably operated a SNF that was involved in one or more of the incidents giving rise to the lawsuits filed by the Florida Claimants (the “Florida Lawsuits”), and the remaining seven (7) were apparently involved in the ownership or operation of the SNFs as affiliates of the others.

“Florida Claimants”³). The Florida Claimants’ claims⁴ originally arose from nursing home negligence at a series of skilled nursing facilities (“SNFs”) formerly owned and/or operated by one of the Florida DivestCo Debtors. The business operations of the relevant SNFs remain fundamentally unchanged from when the negligence incidents occurred.

4. After their claims arose, each of the Florida Claimants retained one of seventeen (17) law firms (collectively, the “Claimant Firms”).⁵ The Claimant Firms commenced lawsuits against corresponding Florida DivestCo Debtors; however, they each ultimately negotiated separate settlement agreements with the corresponding Florida DivestCo Debtors. Dan Dias, Esquire, and the law firm of Dias & Associates (together, the “Dias Defendants”) represented all of the Florida DivestCo Debtors in the lawsuits and settlement negotiations. While the Dias Defendants were negotiating the settlements with the various Claimant Firms, they were also working with Synergy⁶, the Parent Debtor, and two (2) of its affiliates⁷ to

³ The schedule of the Florida Claimants is attached hereto as Exhibit “C,” and specifically identifies each such Florida Claimant, the Claimant Firm corresponding to that Florida Claimant, the amount of the liquidated claim, and other relevant information. The aggregate amount of all claims of Florida Claimants is \$9,186,376.96 and has been modified due to post-petition developments.

⁴ The Florida Claimants are all elderly and vulnerable nursing home residents (and/or their families) who suffered serious personal injuries including infected Stage 4 pressure sores down to the bone, falls, fractures, infections leading to sepsis, organ failure and death, dehydration and malnutrition, and wrongful death caused by neglect and Resident’s Rights violations at SNFs owned and operated by these Florida DivestCo Debtors.

⁵ Each of the Claimant Firms are listed on the schedule attached as Exhibit “D,” and lead trial counsel for each of the Claimant Firms is a director on the board of directors of Recovery Corp.

⁶ Pourlessoins, LLC, d/b/a Synergy Healthcare Services, a/k/a Synergy Healthcare Services, Inc.

“divest” the Florida DivestCo Debtors of their assets and operations (unbeknownst to the various Claimant Firms).

5. Although the Claimant Firms and the Dias Defendants negotiated scores of separate settlement agreements for all the Florida Claimants with all the Florida DivestCo Debtors, they all utilized the same basic settlement agreement and release form. All settlements were predicated upon payments made over time and avoided risk of the entry of a judgment against any of the Debtors. The Florida DivestCo Debtors agreed to the negotiated liquidated amounts of every settlement with every injured or killed nursing home resident that now makes up the Recovery Corp group.

6. The Florida DivestCo Debtors predictably defaulted under each of their settlement agreements.⁸ It is no coincidence that the Florida DivestCo Debtors are no-asset empty shells: The Florida DivestCo Debtors divested their business operations precisely because they were being sued in connection with avoidable transfers and tortious misrepresentations.

7. During early 2024, the Claimant Firms retained the undersigned on behalf of the Florida Claimants to collect on the settlement agreements that the

⁷ NSPRMC, LLC, d/b/a NSPIRE Healthcare (“NSPIRE”) and Aspire Healthcare, LLC (“Aspire”), are both believed to be subsidiaries of Synergy.

⁸ The aggregate of all settlement agreements was \$11,331,000, of which \$2,144,623.04 was paid.

Florida DivestCo Debtors had breached by failing to make the agreed payments.⁹ Recovery Corp. was formed to proportionately represent the Florida Claimants in the Florida DivestCo Reorganizations and enforce their settlement agreements.

8. With the information available, the Claimant Firms authorized and directed counsel for Recovery Corp. to initiate the Miami Action¹⁰ to recover against the Florida DivestCo Debtors and against the Parent Debtor, NSPIRE, Aspire, the Dias Defendants, and others (collectively, the “Miami Defendants”). Causes of action alleged in Recovery Corp.’s complaint in the Miami Action (the “Miami Complaint”) include (a) intentionally and constructively fraudulent transfers, (b) declaratory relief under Florida’s “mere continuation”, “de facto merger”, and “corporate veil piercing” doctrines, and (c) damages for deceptive and unfair trade practices, civil conspiracy, breach of fiduciary duty, and unjust enrichment. All Florida DivestCo Debtors appeared through McDermott, while the remaining Miami Defendants appeared through the Dias Defendants.

9. Entities owned and controlled by Synergy, NSPIRE, Aspire and/or other Synergy subsidiaries (collectively, the “Florida SNF Transferees”) currently operate the relevant SNFs with impunity, with the same substandard care and lack

⁹ As Recovery Corp. was being formed, it was also ascertained that McDermott Will & Emery LLP (“McDermott”) had been involved in the process of decision-making for the Florida DivestCo Debtors.

¹⁰ Styled Healthcare Negligence Settlement Recovery Corp. v. 5405 Babcock Street Operations, LLC, et al., Case No. 2024-007342-CA pending before the Eleventh Judicial Circuit in and for Miami-Dade County, Florida.

of financial responsibility with zero or minimal insurance coverage, just as the Florida DivestCo Debtors used to have.¹¹

10. It now appears that the Florida SNF Transferees took title under dubious circumstances. No less than seventy (70) SNFs were transferred by DivestCo Debtors to seemingly related entities for little or no consideration under operations transfer agreements (“OTAs”) en masse during the months after McDermott was retained during February 2023. These were clearly not arms-length good-faith transactions. For any of the transfers to have occurred, master lease agreements with common landlords would have required landlord consent.

II. PROCEDURAL BACKGROUND

11. On June 2 and 3, 2024, the Debtors commenced the Reorganizations and filed a series of requests for relief. Shortly thereafter, it became apparent that the Debtors would be seeking to consolidate, sell the assets of the OpCo Debtors, and obtain releases for the various transferees, affiliates, parents, fiduciaries, and other likely targets of fraudulent transfer and related claims (collectively, the “Litigation Targets”). This became apparent by the filing of the DIP Finance Motion¹² and the Bidding Procedures Motion¹³ on June 3 and 10, 2024,

¹¹ Attached hereto as Exhibit “E” is a schedule that correlates each of the Florida Claimants with the liable Florida DivestCo Debtors, also identifying each corresponding SNF, and identifying the Florida SNF Transferee currently operating each such SNF, presumably in anticipation of yet another reincarnation of Consulate.

¹² “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

respectively. Needless to say, none of the DivestCo Debtors have any assets to sell, nor do they have any need for post-petition finance. But while none of the DivestCo Debtors will benefit in the least from the sale of assets by the OpCo Debtors, all are being asked to release the Litigation Targets.

12. When the Florida DivestCo Debtors joined the other Debtors in filing these Jointly Administered Reorganizations, the Florida Lawsuits were stayed, and the Miami Action was treated as if it were fully subject to Bankruptcy Code §362(a). Nonetheless, the Debtors initiated a proceeding¹⁴ (the “105(a) Adversary Proceeding”) to fully enjoin any activity in the Miami Action. This included not only a complaint but also an “emergency” motion for injunctive relief [Adv. Doc. 2] (the “Emergency Motion”) even though Recovery Corp. had assured all the Miami Defendants that no action would be taken in the Miami Action absent appropriate relief in the context of these Reorganizations.

13. After a hearing on the Emergency Motion occurring on July 31, 2024, this Court entered a temporary restraining order [Doc. 19] enjoining the Miami Action through no later than September 30, 2024. At the hearing to consider

Adequate Protection To Prepetition Secured Parties, (III) Modifying The Automatic Stay, (IV) Scheduling A Final Hearing, And (V) Granting Related Relief” [Doc. 15].

¹³“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” [Doc. 104].

¹⁴ Adversary Proceeding 24-05127.

temporary relief, it was tacitly conceded that there is very little for Recovery Corp. and its Florida Claimants to expect from this process.

14. Even though McDermott was retained by the Debtors before many of the transfers occurred, the Debtors urge that they will be able to utilize a single independent director and another law firm to self-examine. Recovery Corp. justifiably views such a concept askance. The problem of trusting the Debtors from investigating their own pre-petition actionable misconduct is uniquely illustrated by the Debtors' ipsi dixit contention that the SNFs that were transferred had negative net worth, a proposition that the Debtors make while simultaneously objecting to discovery that would presumably refute this proposition. To be sure, when all the management fees and other expenses siphoned off from related entities are added to the mix, the SNFs presumably had value if there were buyers that took title. Especially if the SNFs were transferred to related entities, which is currently thought to be the case, the transferees surely knew what they were getting.

15. On July 23, 2024, the Debtors filed their "Debtors' Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization" [Doc. 273] (the "Combined Plan"), which provides that Recovery Corp. will receive nothing from confirmation, but will be subject to release provisions in favor of Litigation Targets. Further, the Combined Plan contains no actual disclosure and assumes

consolidation rather than requests the same.

16. On August 6, 2024, Recovery Corp. filed “Recovery Corp.’s Motion to Dismiss or Convert Florida DivestCo Reorganizations” [Doc. 310] (the “Dismissal Motion”) seeking to have this Court either dismiss or convert the fifty chapter 11 reorganizations filed by the Florida DivestCo Debtors (collectively, the “Florida DivestCo Reorganizations”). The gravamen of the Dismissal Motion is that the Florida DivestCo Reorganizations should be dismissed or converted because the Florida DivestCo Debtors, having been divested of their respective SNFs, have nothing to reorganize, and nothing of value other than claims against the Litigation Targets, and the goal of these Jointly Administered Reorganizations is to obtain releases from the Florida DivestCo Debtors’ claims for no consideration.

17. Also on August 6, 2024, Recovery Corp. served the Interrogatories, and Production Request, together with “Recovery Corp.’s Requests To Florida DivestCo Debtors for Admission Pertaining to Motion to Convert Florida DivestCo Reorganizations To Chapter 7 Liquidations” (“Admission Requests”), all of which were targeted at the issues raised in the Dismissal Motion and referred to herein as the “Discovery Requests”.

18. On August 14, 2024, Recovery Corp. filed “Recovery Corp.’s Objection to Confirmation of the Combined Plan” [Doc. 327] (the “Combined Plan

Objection”).

19. The Dismissal Motion and the Combined Plan Objection overlap in terms of factual and legal issues such that the Discovery Requests are also relevant to the adjudication of the issues raised in the Combined Plan Objection.

III. ALLEGATIONS RELATING TO RELIEF REQUESTED AND MEMORANDUM OF LAW

20. The responses to the Discovery Requests were due on or before September 5, 2024. However, as of the date of this motion, the Florida DivestCo Debtors have not responded to the Interrogatories, and although they have begun to produce documents that were previously produced to the Creditor’s Committee, the Florida DivestCo Debtors not served a written response to the Production Request.

21. Under Federal Rule of Civil Procedure 37(a), a party may file a motion to compel when another party fails or refuses to respond to discovery. Friday v. Sallie Mae, Inc., 1:14-CV-558-TCB-ECS, 2014 WL 12860394, at *1 (N.D. Ga. Nov. 20, 2014). As the party resisting discovery the burden is on the Florida DivestCo Debtors to show that the Production Request and Interrogatories are improper, unreasonable, or burdensome. Panola Land Buyers Ass'n v. Shuman, 762 F.2d 1550, 1559 (11th Cir. 1985). Further, pursuant to Federal Rule of Civil Procedure 33(b)(4), any objections to the Interrogatories not timely raised by the Florida DivestCo Debtors may be deemed waived. “Likewise, when a party fails to serve timely responses to requests to produce under Rule 34, the party waives

any objections it may have to this discovery except objections based on privilege or protection.” Sanibel Beach Front Condos LLC v. Sanibel Arms Condo. Ass'n, Inc., 219CV557FTM29NPM, 2020 WL 4741101, at *2 (M.D. Fla. Jan. 8, 2020).

22. Here, it is undisputed that the Florida DivestCo Debtors have failed to timely respond to the Interrogatories and Production Request. As a result, Recovery Corp. is entitled to an order compelling the Florida DivestCo Debtors to respond to the Interrogatories and Production Request by a date certain. Moreover, any objections not timely raised should be deemed waived.

23. With an eighteen (18) month head start, the Debtors are attempting to rapidly advance to confirmation while delaying discovery. Without full discovery compliance, Recovery Corp. is prejudiced because it cannot advance to a determination on the merits of the Dismissal Motion or Combined Plan Objection.

24. On September 3, 2024, the undersigned certifies that the undersigned and respective counsel for the Florida DivestCo Debtors via video conference conferred in good faith regarding the timing of the Florida DivestCo Debtor's responses to the Interrogatories and Production Request. However, as of the date of this motion, Recovery Corp. and the Florida DivestCo Debtors were unable to reach agreement regarding when the Florida DivestCo Debtors would comply in responding to the Interrogatories or Production Request.

WHEREFORE, Recovery Corp. respectfully requests the order of this Court:

- a. granting this motion,
- b. ordering the Florida DivestCo Debtors to respond to the Interrogatories and Production Request by a date certain;
- c. deeming objections to the Production Request and Interrogatories to be waived; and
- d. granting any other further relief this Court deems just and proper.

DATED this 6th day of September, 2024.

/s/ John A. Anthony

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Attorneys for Recovery Corp.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished on September 6, 2024, by electronic means to:

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/s/ John A. Anthony

ATTORNEY

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

In re:

LAVIE CARE CENTERS, LLC, et. al.,

Case No.: 24-55507-PMB

Chapter 11

Debtor.

Cases Jointly Administered

**RECOVERY CORP.'S FIRST SET OF INTERROGATORIES TO
FLORIDA DIVESTCO DEBTORS PERTAINING TO MOTION TO CONVERT
FLORIDA DIVESTCO REORGANIZATIONS TO CHAPTER 7 LIQUIDATIONS**

Pursuant to Federal Rule of Bankruptcy Procedure Federal Rule of Civil Procedure 33 and other applicable law, Healthcare Negligence Settlement Recovery Corp. (the "Recovery Corp."), by and through its undersigned counsel, requests that fifty (50) business entities (collectively, the "Florida DivestCo Debtors")¹: respond to the

¹ 1010 Carpenters Way Operations LLC, 1120 West Donegan Avenue Operations LLC, 11565 Harts Road Operations LLC, 195 Mattie M. Kelly Boulevard 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 A venue Operations LLC, 3001 Palm Coast Parkway Operations LLC, 3101 Ginger Drive Operations LLC, 3735 Evans Avenue Operations LLC, 3920 Rosewood Way Operations, LLC, 4200 Washington Street Operations LLC, 4641 Old Canoe Creek Road Operations LLC, 518 West Fletcher A venue 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 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.

interrogatories in compliance with the definitions and instructions additionally set forth therein within thirty (30) days after service of this request or at such other reasonable time as might be mutually agreed upon by the duly authorized attorneys of the parties.

DATED this 6th day of August, 2024.

/s/ John A. Anthony

JOHN A. ANTHONY, ESQUIRE

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Attorneys for Recovery Corp.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished on August 6, 2024, by electronic means to:

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/s/ John A. Anthony
ATTORNEY

EXHIBIT “A”

DEFINITIONS AND INSTRUCTIONS

The following definitions and instructions are to be used or referred to in connection with “Recovery Corp.’s First Set of Interrogatories to Florida DivestCo Debtors Pertaining to Motion to Convert Florida DivestCo Reorganizations to Chapter 7 Liquidations” (these “Interrogatories”):

1. The term “Recovery Corp.” shall refer to Healthcare Negligence Settlement Recovery Corp., together with any past or present shareholders, officers, directors, employees, accountants, attorneys, or other agents of Recovery Corp.

2. The term “Florida Claims” shall refer to all causes of action, claims, and other rights that Recovery Corp. possesses against any Debtors, Litigation Targets, or others that are relevant to nursing home negligence of the Florida DivestCo Debtors, the Divested Florida SNFs, or the circumstances under which the Divested Florida SNFs were transferred to the Florida SNF Transferees, whether known or unknown, asserted or unasserted, meritorious or frivolous, disputed or undisputed, liquidated or unliquidated, fixed or contingent.

3. The term “Florida Claimants” shall refer to the Florida-based claimants who have assigned their Florida Claims to Recovery Corp., such claims having originally arisen based upon nursing home negligence at Divested Florida SNFs formerly owned by the various Florida DivestCo Debtors.

4. The term “Claimant Firms” shall refer to the seventeen (17) law firms representing the Florida Claimants nursing home negligence victims’ claims after their Florida Claims arose.

5. The term “Florida Lawsuits” shall refer to a set of lawsuits and related litigation activities commenced by the Claimant Firms on behalf of the Florida Claimants against the Florida DivestCo Debtors and others to recover on nursing home negligence grounds arising under Florida Statutes §400.001, et seq.

6. The term “Miami Action” shall refer to an action in the complex business division of the Circuit Court in and for Miami-Dade County, Florida (the “Miami Court”) to recover what are alleged to be avoidable transfers, and for other relief, styled Healthcare Negligence Settlement Recovery Corp. v. 5405 Babcock Street Operations, LLC, et al., Case No. 2024-007342-CA-01, initiated on April 22, 2024.

7. The term “Miami Defendants” shall refer to all defendants named in the Miami Action.

8. The term “Debtors” shall refer to the 282 chapter 11 debtors, together with any members, managing members, employees, accountants, attorneys, or other agents of the Debtors.

9. The term “Reorganizations” shall refer to the 282 chapter 11 reorganizations, jointly administered under Case No. 24-55507-PMB, In re LaVie Care Centers, LLC, et al., before the United States Bankruptcy Court, Northern District of Georgia, Atlanta Division.

10. The term “Parent Debtor” shall refer to LaVie Care Centers, LLC, together with any members, managing members, employees, accountants, attorneys, or other agents of the Parent Debtor.

11. The term “OpCo Debtors” shall refer to a subset of 43 Debtors who have owned and/or operated one or more SNF since the Petition Dates.

12. The term “DivestCo Debtors” shall refer to a subset of Debtors who owned and/or operated one or more SNF prior to the Petition Dates, but transferred ownership or control of their business and/or assets such that they are presently de facto shell entities.

13. The term “Florida DivestCo Debtors” shall refer to a subset of DivestCo Debtors who owned and/or operated one or more SNF at the time that nursing home negligence claims arose under Florida Statutes §400.001, et seq. that gave rise to the Florida Lawsuits.

14. The term “Florida DivestCo Reorganizations” shall refer to a subset of the Reorganizations that correspond to the Florida DivestCo Debtors.

15. The term “Non-Debtor Related Entities” shall refer to the parent of the Parent Debtor, as well as all affiliates of the Parent Debtor, and all subsidiaries of those affiliates, including without limitation Pourlessions, LLC, d/b/a Synergy Healthcare Services, a/k/a Synergy Healthcare Services, Inc. (“Synergy”), NSPRMC, LLC, d/b/a NSPIRE Healthcare (“NSPIRE”) and Aspire Healthcare, LLC (“Aspire”), and all Florida SNF Transferees who are owned and/or controlled by any of the Non-Debtor Related Entities.

16. The term “SNFs” shall refer to skilled nursing facilities, to the extent previously or currently owned or operated by any of the Debtors.

17. The term “Divested Florida SNFs” shall refer to the subset of SNFs from which the Florida DivestCo Debtors were divested prior to the Petition Dates.

18. The term “Florida SNF Transferees” shall refer to any owner or operator of one or more SNF based in Florida who has owned and/or operated such SNF from or after the moment that one or more of the Florida DivestCo Debtors was divested of that SNF.

19. The term “Current Florida SNFs” shall refer to a potential subset of SNFs located in Florida and owned and/or operated by some of the OpCo Debtors as of the Petition Dates.

20. The term “Dias Defendants” shall refer to Dan Dias, Esquire and the law firm of Dias & Associates, together with any members, managing members, employees, accountants, attorneys, or other agents of the Dias Defendants.

21. The term “Florida Landlords” shall refer to every past or present landlord for any Florida SNF from January 1, 2021, through the Petition Dates, including without limitation the “Omega Parties” as defined in the DIP Finance Motion and the Bidding Procedures Motion.

22. The term “DIP Finance Motion” shall refer to “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” [Doc. 15].

23. The term “Bidding Procedures Motion” shall refer 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” [Doc. 104].

24. The term “Combined Plan” shall refer to “Debtors’ Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization” [Doc. 273], filed in the Reorganizations on July 23, 2024.

25. The term “Litigation Targets” shall refer to any of the Miami Defendants, any of the Florida Landlords, all the Florida SNF Transferees, Non-Debtor Related Entities, and any individual or entity intended to receive a release under relevant provisions of the DIP Finance Motion, Bidding Procedures Motion, or Combined Plan.

26. The term “Creditors Committee” shall refer to the June 13, 2024, appointment of the Official Committee of Unsecured Creditors in these Reorganizations by Office of the United States Trustee.

27. The term “Petition Dates” shall refer to the date the Petition was filed, that being June 2, 2024.

28. The term “Fraudulent Transfer Schedule” shall refer to the schedule attached hereto as Exhibit “A.”

29. The term “Florida Schedules” shall refer collectively to all information relating to the Florida DivestCo Debtors set forth in the Debtors’ schedules and statements of affairs filed in these Reorganizations.

30. The term “Dismissal Motion” shall refer to the motion to dismiss or convert the Florida DivestCo Reorganizations filed by Recovery Corp. on or as of August 5, 2024, to which this discovery is tailored.

31. The term “Production Requests” shall refer to the “Recovery Corp.’s Request for Production to Florida DivestCo Debtors Pertaining to Motion to Convert Florida DivestCo Reorganizations to Chapter 7 Liquidations,” served simultaneously herewith.

32. The term “Admissions Request” shall refer to “Recovery Corp.’s Requests for Admission to Florida DivestCo Debtors Pertaining to Motion to Convert Florida DivestCo Reorganizations to Chapter 7 Liquidations,” served simultaneously herewith.

33. The term “control,” when applied to a business entity, shall mean the ownership, individually, singularly, or together with a spouse (as co-obligor, as tenants by the entirety, or otherwise), on in conjunction with any person, partnership, corporation, or other business entity (to the extent also so controlled) of more than half of the authorized, issued, and outstanding shares of such business entity. This term shall also include a de facto control of such business entity, including exercise of day-to-day responsibility for business or financial affairs of such business entity.

34. The term “identify,”

(a) when used in reference to any individual person, shall mean to state that individuals full name, present address, present employer, and occupation;

(b) when used as reference to a person other than an individual, shall mean to state the legal nature of that person (e.g., a corporation, partnership, trust, estate, association, company), and to state its full name, address, and principal place of business; and

(c) when used in reference to a document (or documents), shall mean to state the document's author, signatory, addressee, title, date, and page length.

35. The term "or" shall be construed by their conjunctively or disjunctively to bring within the scope of these requests any information which might otherwise be construed to be outside their scope.

36. The term "document" shall mean any and all information in tangible form, including without limitation, all letters, telegrams, telexes, teletypes, correspondence, e-mail transmissions and comparable computerized communications, text messages, MMS, SMS, iMessage, WhatsApp, Facebook Messenger, contracts, drafts, agreements, notes to file, reports, memoranda, electrical or mechanical recordings or transcripts of such recordings, blueprints, flow sheets, calendar or diary entries, memoranda of telephone or personal conversations, memoranda or meetings or conferences, studies, reports, intra-office communications, manuals, newsletters, compilations, charts, graphs, compositions, bids, articles, announcements, newspaper clippings, books, records, tables, books of account, ledgers, vouchers, canceled checks, invoices, bills, opinions, certificates,

promissory notes, evidence of indebtedness, and all drafts and copies of documents as herein defined, by whatever means made. Documents include ESI, and ESI should be interpreted as a subset of documents. Documents also include Communications which should be interpreted as a subset of Documents.

37. The term “ESI” means electronically stored information and shall have the broadest definition possible under the Federal Rules of Civil Procedure and the Federal Rules of Bankruptcy Procedure, and shall include, without limitation, software, outputs resulting from the sue software (including word-processing documents, spreadsheets, database files, charts, graphs, and outlines), programming notes and instructions, electronic mail, listings of email transmittals and receipts, and all miscellaneous files and file fragments, regardless of the media on which they reside. The term ESI further includes all items stored on computers, tablets, smartphones, and removable media (including USB drives, hard disks, diskettes, cartridges, CD-ROMs, magnetic tapes, microfiche, and any other media for digital data storage or transmittal). The term ESI expressly includes all related metadata.

38. The term “including” means including without limitation and does not limit the scope of any request.

39. The term “related to” or any form thereof means to embody, record, refer to, concern, reflect, or in any manner involved or otherwise implicate the subject matter of this Production Request.

40. To the extent that any of the Florida DivestCo Debtors are unable to respond to any of the requests in this Admission Request, that Florida DivestCo Debtor must set forth in detail the reasons it cannot do so.

41. To the extent that any of the Florida DivestCo Debtors consider any of the following requests in these Interrogatories to be objectionable, that Florida DivestCo Debtor must respond to as much of such request or each part thereof as is not objectionable, in its view, then separately set forth the basis for such objection.

42. The repetition of definitions or instructions herein is intended to assist the Florida DivestCo Debtors in responding to and complying with these Interrogatories; however, such repetition shall in no way limit the application of the definitions herein.

43. Any defined term contained in these Interrogatories may be used, when applicable, in its possessive or plural form as reasonably applicable, as well as in masculine, feminine, or neuter form.

II. INTERROGATORIES

1. Identify every individual (a) having any material role in responding to these Interrogatories, (b) having responsibility for substantive knowledge regarding documents described in the Production Request, and/or (c) having any material role in responding to the Admissions Request.

ANSWER:

2. Identify all individuals having material personal knowledge regarding any of the material allegations set forth in the Dismissal Motion and/or any responses or objections to matters covered in the Admissions Request, and these Interrogatories.

ANSWER:

3. If the Florida DivestCo Debtors deny that each of them formerly operated a Divested Florida SNF, as reflected in the Fraudulent Transfer Schedule, identify and explain every fact, circumstance, condition, event, document, and witness that confirms, refutes, or otherwise materially bears on said denial.

ANSWER:

4. If the Florida DivestCo Debtors deny that each of the Florida Claimants is a former resident of a Divested Florida SNF, or the legal representative of such a resident, or such resident's probate estate, identify and explain every fact, circumstance, condition, event, document, and witness that confirms, refutes, or otherwise materially bears on said denial.

ANSWER:

5. If the Florida DivestCo Debtors deny that each of the Florida Claimants asserted a nursing home negligence claim arising under chapter 400 Florida Statutes against a corresponding Florida DivestCo Debtor, as reflected in the Fraudulent Transfer Schedule, while said Florida DivestCo Debtor operated its Divested Florida SNF, identify and explain every fact, circumstance, condition, event, document, and witness that confirms, refutes, or otherwise materially bears on said denial.

ANSWER:

6. Explain the role of the Dias Defendants in dealing with the Claimant Firms in connection with the Florida Lawsuits and the settlement of the Florida Claims, taking care to identify every position or role that Dan Dias, Esquire, held or maintained at the time as counsel, officer, or any other role on behalf of the Florida DivestCo Debtors, any of the other Debtors, or any of the Non-Debtor Related Entities during or about this time frame.

ANSWER:

7. Set forth the circumstances under which each of the Florida DivestCo Debtors relinquished operational control of its Divested Florida SNF to one of the Florida SNF Transferees, following the date that each such Florida Claimant asserted a claim against the corresponding Florida DivestCo Debtor, as reflected in the Fraudulent Transfer Schedule.

ANSWER:

8. Set forth the sums due to each of the Florida Claimants when each of their corresponding Florida DivestCo Debtors relinquished operational control of its Divested Florida SNF to one of the Florida SNF Transferees under the settlements previously reached with the Dias Defendants on behalf of the Florida DivestCo Debtors.

ANSWER:

9. Explain the corporate relationship in terms of ownership, management, or control of the Parent Debtor to each of the Florida DivestCo Debtors, taking care to identify any mediate or intermediate parents, subsidiaries, affiliates, or related entities.

ANSWER:

10. Explain the corporate relationship in terms of ownership, management, or control of Synergy to the Parent Debtor, Raydiant, NSPIRE, Aspire, and any other subsidiary of Synergy having a direct or indirect interest in the Florida SNF Transferees.

ANSWER:

11. For each instance in which one of the Florida DivestCo Debtors relinquished operational control of its Divested Florida SNF to one of the Florida SNF Transferees, identify what value the corresponding Florida SNF Transferee gave on account of each such transfer.

ANSWER:

12. For each instance in which one of the Florida DivestCo Debtors relinquished operational control of its Divested Florida SNF to one of the Florida SNF Transferees, identify what value the corresponding Florida Landlord gave or received on account of each such transfer.

ANSWER:

13. Set forth all benefits that the Florida DivestCo Debtors and their estates derive from any funding authorized by this Court upon consideration of the DIP Finance Motion.

ANSWER:

14. Set forth all assets that the Florida DivestCo Debtors and their estates intend to market or sell in connection with any sale authorized by this Court upon consideration of the Bidding Procedures Motion.

ANSWER:

15. Set forth in summary fashion what business or financial affairs each of the Florida DivestCo Debtors propose to reorganize or liquidate under the Combined Plan.

ANSWER:

16. With respect to each divestment of a Divested Florida SNF, set forth the opinion of the corresponding Florida DivestCo Debtor as to the value received by the corresponding Florida SNF Transferee as a result of such transaction, taking care to identify any document or expert who contributed to this opinion, or any other basis for this opinion, whether lay or professional.

ANSWER:

17. Describe all measures taken by the Florida DivestCo Debtors, Synergy, the Parent Debtor, the Florida SNF Transferees, the Dias Defendants, or any other law firm for any of them, to advise either the Florida Claimants or the Claimant Firms, of its filings/applications with the Florida Agency for Health Care Administration (“AHCA”), relating to operations transfer agreements (“OTA”), change of ownership filings (“CHOW”), change of operator filings (“CHOP”), and other filings, applications, and submissions relating to the divestment of Divested Florida SNFs from their corresponding Florida DivestCo Debtors.

ANSWER:

18. Identify the name of every individual or business entity, including aliases or DBAs as applicable, that the Debtors believe or urge will receive some form of release under the relief requested by the Debtors in the Bidding Procedures Motion, the DIP Finance Motion, or under the Combined Plan.

ANSWER:

19. Describe the manner in which the Debtors share any substantial identity in connection with their pre-petition business, financial, or legal dealings.

ANSWER:

20. Identify any and all instances in which any of the Florida Claimants is believed by any of the Florida DivestCo Debtors to have relied upon the consolidated credit of more than one of the Debtors in connection with any business or financial affairs of each such Florida Claimant.

ANSWER:

21. Set forth every fact, circumstance, condition, event, or other basis upon which the Florida DivestCo Debtors contend that it would be fair and equitable for Recovery Corp. to receive no distribution on account of its claims in these Reorganizations and simultaneously be precluded from asserting third-party claims against the Miami Defendants and the other Litigation Targets.

ANSWER:

22. Set forth every fact, circumstance, condition, event, or other basis upon which the Florida DivestCo Debtors contend that they can propose the Combined Plan in good faith when it would produce little or no distribution to Recovery Corp. on account of its claims, and yet preclude Recovery Corp. from asserting claims against the Miami Defendants and the other Litigation Targets.

ANSWER:

23. If the Florida DivestCo Debtors contend that Recovery Corp. has inaccurately concluded that the Combined Plan, the Bidding Procedures Motion, and the DIP Finance Motion would grant broader releases in favor of the Miami Defendants and/or the Litigation Targets than the Debtors intend, explain why the Debtors have sought and obtained a temporary restraining order under Bankruptcy Code §105(a) precluding Recovery Corp. from pursuing these same third-party defendants.

ANSWER:

Exhibit “A”

	Claimant Last Name	Claimant First Name	Debtor Name	Street Address	New Owner/Licensee (Transferee)	Controlling Interest	Operator Date Change	Real Property Owner LLC
1	Cobb	Doneatha	1010 Carpenters Way Operations, LLC	1010 Carpenters Way Lakeland, FL 33809	Wedgewood Operating LLC	Wedgewood Holdco LLC	9/5/2023	1010 Carpenters Way Fl Owner LLC / Welltower Inc
2	Rigas	Gail	1120 West Donegan Avenue Operations, LLC	1120 W, Donegan Ave Kissimmee, FL 34741	West Donegan AVE SNF OPCO LLC	West Donegan SNF Parent LLC	9/1/2023	1120 West Donegan Avenue Fl Owner LLC / Welltower Inc
3	Acededo	Sharon	1120 West Donegan Avenue Operations, LLC	1120 W, Donegan Ave Kissimmee, FL 34741	West Donegan AVE SNF OPCO LLC	West Donegan SNF Parent LLC	9/1/2023	1120 West Donegan Avenue Fl Owner LLC / Welltower Inc
4	Mackey	George	1120 West Donegan Avenue Operations, LLC	1120 W, Donegan Ave Kissimmee, FL 34741	West Donegan AVE SNF OPCO LLC	West Donegan SNF Parent LLC	9/1/2023	1120 West Donegan Avenue Fl Owner LLC / Welltower Inc
5	McKinnion-Murphy	Netti	1120 West Donegan Avenue Operations, LLC	1120 W, Donegan Ave Kissimmee, FL 34741	West Donegan AVE SNF OPCO LLC	West Donegan SNF Parent LLC	9/1/2023	1120 West Donegan Avenue Fl Owner LLC / Welltower Inc
6	Lizardi	Miriam	1120 West Donegan Avenue Operations, LLC	1120 W, Donegan Ave Kissimmee, FL 34741	West Donegan AVE SNF OPCO LLC	West Donegan SNF Parent LLC	9/1/2023	1120 West Donegan Avenue Fl Owner LLC / Welltower Inc
7	McHenry	Vickie	11565 Harts Road Operations, LLC	11565 Harts Rd Jacksonville, FL 32218	11565 Harts Road Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012	Beverly Investment Properties
8	Barrett	Harry Wayne	11565 Harts Road Operations, LLC	11565 Harts Rd Jacksonville, FL 32218	11565 Harts Road Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012	Beverly Investment Properties
9	Mazza	Alfonso	12170 Cortez Boulevard Operations, LLC	12170 Cortez Blvd Brooksville, FL 34613	12170 Cortez Blvd Opc LLC		12/1/2023	FC Encore Brooksville II, LLC / Omega Healthcare Investors Inc
10	Perez	Suzanne	1465 Oakfield Drive Operations, LLC	1465 Oakfield Dr Brandon, FL 33511	1465 Oakfield Dr OPCO LLC	1465 Oakfield Dr OPCO Parent LLC	12/1/2023	FC Encore Brandon LLC / Omega Healthcare Investors Inc
11	Foster	Levi	15204 West Colonial Drive Operations, LLC	15204 W Colonial Dr Winter Garden, FL 34787	West Colonial Drive OPCO LLC	West Colonial Parent LLC	9/1/2023	15204 W Colonial Drive Fl Owner LLC / Welltower Inc
12	Lane	Ingrid K.	1550 Jess Parrish Court Operations, LLC	1550 Jess Parrish Ct Titusville, FL 32796	Vista Manor Operating LLC	Vista Manor Holdco LLC	9/5/2023	1550 Jess Parrish Court Fl Owner LLC
13	Knight	Mae	1615 Miami Road Operations, LLC	1615 Miami Rd Ft Lauderdale, FL 33316	Miami Road OPCO LLC	Miami Road Parent LLC	9/1/2023	1615 Miami Road Fl Owner LLC
14	Walker	Lula Mae	1615 Miami Road Operations, LLC	1615 Miami Rd Ft Lauderdale, FL 33316	Miami Road OPCO LLC	Miami Road Parent LLC	9/1/2023	1615 Miami Road Fl Owner LLC
15	Poarch	Erin	1851 Elkcam Boulevard Operations, LLC	1851 Elkcam Blvd Deltona, FL 32725	Deltona Operating LLC	Deltona Holdco LLC	9/5/2023	FC Encore Deltona LLC / Omega Healthcare Investors Inc
16	Kolbe	Richard	1851 Elkcam Boulevard Operations, LLC	1851 Elkcam Blvd Deltona, FL 32725	Deltona Operating LLC	Deltona Holdco LLC	9/5/2023	FC Encore Deltona LLC / Omega Healthcare Investors Inc
17	Knicley	Peggy	195 Mattie M. Kelly Boulevard Operations, LLC	195 Mattie M Kelly Blvd Destin, FL 32541	Destin Senior Care, LLC	Various	4/17/2023	FC Encor Destin LLC/ Omega Healthcare Investors Inc
18	Ortiz	Crispin	216 Santa Barbara Boulevard Operations, LLC	216 Santa Barbara Blvd Cape Coral, FL 33991	Santa Barbara Blvd OPCO LLC	Santa Barbara Parent LLC	11/2/2023	FC Encore Cape Coral LLC/ Omega Healthcare Investors Inc
19	Guelich	Judy	2333 North Brentwood Circle Operations, LLC	2333 N. Brentwood Cir Lecanto FL 34461	North Brentwood Circle OPCO LLC	Brentwood Parent LLC	11/2/2023	FC Encore Lecanto LLC / Omega Healthcare Investors Inc
20	Barry	John	2826 Cleveland Avenue Operations, LLC	2826 Cleveland Ave, Fort Myers, FL 33901	2826 Cleveland Avenue Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012	Decathlon Tyst LLC
21	Skow-Barr	Delano	2826 Cleveland Avenue Operations, LLC	2826 Cleveland Ave, Fort Myers, FL 33901	2826 Cleveland Avenue Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012	Decathlon Tyst LLC
22	Woodard	Chester	2826 Cleveland Avenue Operations, LLC	2826 Cleveland Ave, Fort Myers, FL 33901	2826 Cleveland Avenue Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012	Decathlon Tyst LLC
23	Milsap	Carmen	3001 Palm Coast Parkway Operations, LLC	3001 Palm Coast Parkway SE Palm Coast, FL 32137	Palm Coast PKWY OPCO LLC	Palm Coast Parent LLC	11/2/2023	FC Encore Palm Coast LLC / Omega Healthcare Investors Inc
24	Foster	Mary	3001 Palm Coast Parkway Operations, LLC	3001 Palm Coast Parkway SE Palm Coast, FL 32137	Palm Coast PKWY OPCO LLC	Palm Coast Parent LLC	11/2/2023	FC Encore Palm Coast LLC / Omega Healthcare Investors Inc
25	Blair	Bobby	3001 Palm Coast Parkway Operations, LLC	3001 Palm Coast Parkway SE Palm Coast, FL 32137	Palm Coast PKWY OPCO LLC	Palm Coast Parent LLC	11/2/2023	FC Encore Palm Coast LLC / Omega Healthcare Investors Inc
26	Powell	Tereather	3101 Ginger Drive Operations, LLC	3101 Ginger Dr Tallahassee, FL 32308	Ginger Drive OPCO LLC	Ginger Parent LLC	11/2/2023	FC Encore Core Tallahassee I LLC / Omega Healthcare Investors Inc
27	Malcomb	Buddy	3735 Evans Avenue Operations, LLC	3735 Evans Ave Fort Myers, FL 33901	Evans Avenue OPCO LLC	Evans Parent LLC	11/2/2023	FC Encore Fort Myers LLC / Omega Healthcare Investors Inc
28	McGhee	David	3735 Evans Avenue Operations, LLC	3735 Evans Ave Fort Myers, FL 33901	Evans Avenue OPCO LLC	Evans Parent LLC	11/2/2023	FC Encore Fort Myers LLC / Omega Healthcare Investors Inc
29	Rucker-Fluellen	Mildred	3735 Evans Avenue Operations, LLC	3735 Evans Ave Fort Myers, FL 33901	Evans Avenue OPCO LLC	Evans Parent LLC	11/2/2023	FC Encore Fort Myers LLC / Omega Healthcare Investors Inc
30	Moran	Doris	3735 Evans Avenue Operations, LLC	3735 Evans Ave Fort Myers, FL 33901	Evans Avenue OPCO LLC	Evans Parent LLC	11/2/2023	FC Encore Fort Myers LLC / Omega Healthcare Investors Inc
31	Griffin	John	3920 Rosewood Way Operations, LLC	3920 Rosewood Way Orlando, FL 32808	3920 Rosewood Way OPCO LLC	3920 Rosewood Way OPCO Parent LLC	12/1/2023	3920 Rosewood Way Fl Owner LLC / Welltower Inc
32	Joseph	Maria L.	4200 Washington Street Operations, LLC	4200 Washington St Hollywood, FL 33021	Hillcrest OPCO LLC	Hillcrest OPCO Holdings LLC	9/29/2023	Hillcrest Propco LLC
33	Antoine	Philomene	4200 Washington Street Operations, LLC	4200 Washington St Hollywood, FL 33021	Hillcrest OPCO LLC	Hillcrest OPCO Holdings LLC	9/29/2023	Hillcrest Propco LLC
34	Manuel	Anthony	4200 Washington Street Operations, LLC	4200 Washington St Hollywood, FL 33021	Hillcrest OPCO LLC	Hillcrest OPCO Holdings LLC	9/29/2023	Hillcrest Propco LLC
35	Mompont	Juliette	4200 Washington Street Operations, LLC	4200 Washington St Hollywood, FL 33021	Hillcrest OPCO LLC	Hillcrest OPCO Holdings LLC	9/29/2023	Hillcrest Propco LLC

* 12170 Cortez Blvd Operations LLC No Controlling Interest Provided

**195 Mattie M Kelly 4 different controlling Interest

*** 777 Ninth Street No Controlling Interest Provided

****West Altamonte No Controlling Interest Provided

July 25, 2024

Claimant Last Name	Claimant First Name	Debtor Name	Street Address	New Owner/Licensee (Transferee)	Controlling Interest	Operator Date Change	Real Property Owner LLC
36	Oegar	Avram	4200 Washington Street Operations, LLC	4200 Washington St Hollywood, FL 33021	Hillcrest OPCO LLC	Hillcrest OPCO Holdings LLC	9/29/2023 Hillcrest Propco LLC
37	Pina	Mirelle	4200 Washington Street Operations, LLC	4200 Washington St Hollywood, FL 33021	Hillcrest OPCO LLC	Hillcrest OPCO Holdings LLC	9/29/2023 Hillcrest Propco LLC
38	Tillman	Linda	4200 Washington Street Operations, LLC	4200 Washington St Hollywood, FL 33021	Hillcrest OPCO LLC	Hillcrest OPCO Holdings LLC	9/29/2023 Hillcrest Propco LLC
39	Vargas	Gerado	4200 Washington Street Operations, LLC	4200 Washington St Hollywood, FL 33021	Hillcrest OPCO LLC	Hillcrest OPCO Holdings LLC	9/29/2023 Hillcrest Propco LLC
40	Gibson	Benny	4641 Old Canoe Creek Road Operations, LLC	4641 Old Canoe Creek Road Sanit Cloud, FL 34769	541 Old Canoe Creek Rd OPCO LLC	541 Old Canoe Creek Rd OPCO Parent LLC	12/1/2023 541 Old Canoe Creek Rd FI Owner LLC / Welltower Inc
41	Diaz	Jose R.	518 West Fletcher Avenue Operations, LLC	518 W Fletcher Ave Tampa, FL 33612	West Fletcher Ave OPCO LLC	West Fletcher Parent LLC	9/1/2023 518 West Fletcher Avenue FL Owner LLC / Welltower Inc
42	Hill	Roosevelt	518 West Fletcher Avenue Operations, LLC	518 W Fletcher Ave Tampa, FL 33612	West Fletcher Ave OPCO LLC	West Fletcher Parent LLC	9/1/2023 518 West Fletcher Avenue FL Owner LLC / Welltower Inc
43	Abel	Bebee	5405 Babcock Street Operations, LLC	5405 Babcock St NE Palm Bay, FL 32905	5405 Babcock St NE OPCO LLC	5405 Babcock St NE OPCO Parent LLC	12/1/2023 5405 Babcock St NE FI Owner LLC / Welltower Inc
44	Holt	Mary	6305 Cortez Road West Operations, LLC	6305 Cortez Rd W Bradenton, FL 34210	6305 Cortez RD W OPCO LLC	6305 Cortez RD W OPCO Parent LLC	12/1/2023 FC Encore Bradenton LLC / Omega Healthcare Investors Inc
45	Druelle	Catherine	6305 Cortez Road West Operations, LLC	6305 Cortez Rd W Bradenton, FL 34210	6305 Cortez RD W OPCO LLC	6305 Cortez RD W OPCO Parent LLC	12/1/2023 FC Encore Bradenton LLC / Omega Healthcare Investors Inc
46	Rodriguez	Delia	6414 13th Road South Operations, LLC	6414 13th Rd S Greenacres, FL 33415	13th Road OPCO LLC	13th Road Parent LLC	9/1/2023 Marlin Wood Lake Propco LLC / Welltower Inc
47	Thenor	Rosita	6414 13th Road South Operations, LLC	6414 13th Rd S Greenacres, FL 33415	13th Road OPCO LLC	13th Road Parent LLC	9/1/2023 Marlin Wood Lake Propco LLC / Welltower Inc
48	Aker	Kevin	6700 N.W. 10th Place Operations, LLC	6700 NW 10th Place Gainesville, FL 32605	NW 10th Place OPCO LLC	NW 10th Parent LLC	9/1/2023 6700 NW 10th Place FI Owner LLC
49	Garrett	Donald	6700 N.W. 10th Place Operations, LLC	6700 NW 10th Place Gainesville, FL 32605	NW 10th Place OPCO LLC	NW 10th Parent LLC	9/1/2023 6700 NW 10th Place FI Owner LLC
50	McCray	Gwendolyn	6700 N.W. 10th Place Operations, LLC	6700 NW 10th Place Gainesville, FL 32605	NW 10th Place OPCO LLC	NW 10th Parent LLC	9/1/2023 6700 NW 10th Place FI Owner LLC
51	Wilkie	Barbara	6700 N.W. 10th Place Operations, LLC	6700 NW 10th Place Gainesville, FL 32605	NW 10th Place OPCO LLC	NW 10th Parent LLC	9/1/2023 6700 NW 10th Place FI Owner LLC
52	Whitcomb	Susan	702 South Kings Avenue Operations, LLC	702 S Kings Ave Brandon, FL 33511	702 S Kings OPCO LLC (not in Sunbiz)	702 S Kings OPCO Parent LLC	12/1/2023 Florida Lessor - Five Facilities Inc
53	Sampson	Marguerite	710 North Sun Drive Operations, LLC	710 North Sun Drive Lake Mary, FL 32746	710 N SUN DR OPCO LLC	710 N Sun Dr OPCO Parent LLC	12/1/2023 710 N Sun Dr FI Owner LLC / Welltower Inc
54	Cherba	Nancy	710 North Sun Drive Operations, LLC	710 North Sun Drive Lake Mary, FL 32746	710 N SUN DR OPCO LLC	710 N Sun Dr OPCO Parent LLC	12/1/2023 710 N Sun Dr FI Owner LLC / Welltower Inc
55	Norris	Dorothy	710 North Sun Drive Operations, LLC	710 North Sun Drive Lake Mary, FL 32746	710 N SUN DR OPCO LLC	710 N Sun Dr OPCO Parent LLC	12/1/2023 710 N Sun Dr FI Owner LLC / Welltower Inc
56	Solash-Reed	Linda	710 North Sun Drive Operations, LLC	710 North Sun Drive Lake Mary, FL 32746	710 N SUN DR OPCO LLC	710 N Sun Dr OPCO Parent LLC	12/1/2023 710 N Sun Dr FI Owner LLC / Welltower Inc
57	Howard	Don	710 North Sun Drive Operations, LLC	710 North Sun Drive Lake Mary, FL 32746	710 N SUN DR OPCO LLC	710 N Sun Dr OPCO Parent LLC	12/1/2023 710 N Sun Dr FI Owner LLC / Welltower Inc
58	Cummingham	Jeffrey	741 South Beneva Road Operations, LLC	741 South Beneva Road Sarasota, FL 34232	741 S Beneva RD OPCO LLC	741 S Beneva RD OPCO Parent LLC	12/1/2023 741 S Beneva Rd FI Owner LLC / Welltower Inc
59	Ashley	Mary	777 Ninth Street North Operations, LLC	777 9th St N Naples, FL 34102			FC Encore Naples LLC / Omega Healthcare Investors Inc
60	Higgins	Joan	777 Ninth Street North Operations, LLC	777 9th St N Naples, FL 34102			FC Encore Naples LLC / Omega Healthcare Investors Inc
61	Bershadski	Nelia	777 Ninth Street North Operations, LLC	777 9th St N Naples, FL 34102			FC Encore Naples LLC / Omega Healthcare Investors Inc
62	Davis	Larry	777 Ninth Street North Operations, LLC	777 9th St N Naples, FL 34102			FC Encore Naples LLC / Omega Healthcare Investors Inc
63	Zayas	Edwin	7950 Lake Underhill Road Operations, LLC	7950 Lake Underhill Road Orlando, FL 32822	7950 Lake Underhill Road Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012 Rio Propco LLC
64	O'Berry	Barbara	7950 Lake Underhill Road Operations, LLC	7950 Lake Underhill Road Orlando, FL 32822	7950 Lake Underhill Road Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012 Rio Propco LLC
65	Rojas	Gloria	7950 Lake Underhill Road Operations, LLC	7950 Lake Underhill Road Orlando, FL 32822	7950 Lake Underhill Road Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012 Rio Propco LLC
66	Vega	Rafel	7950 Lake Underhill Road Operations, LLC	7950 Lake Underhill Road Orlando, FL 32822	7950 Lake Underhill Road Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012 Rio Propco LLC
67	Gates	Shirley	9311 South Orange Blossom Trail Operations, LLC	9311 S. Orange Blossom Trl Orlando, FL 32837	Parks Operating LLC	Parks Holdco LLC	4/1/2023 Marlin Parks Propco LLC / Welltower Inc
68	Stover	Machrell	9311 South Orange Blossom Trail Operations, LLC	9311 S. Orange Blossom Trl Orlando, FL 32837	Parks Operating LLC	Parks Holdco LLC	4/1/2023 Marlin Parks Propco LLC / Welltower Inc
69	Williams	Nessa	9311 South Orange Blossom Trail Operations, LLC	9311 S. Orange Blossom Trl Orlando, FL 32837	Parks Operating LLC	Parks Holdco LLC	4/1/2023 Marlin Parks Propco LLC / Welltower Inc
70	McKenzie	Stanley	9311 South Orange Blossom Trail Operations, LLC	9311 S. Orange Blossom Trl Orlando, FL 32837	Parks Operating LLC	Parks Holdco LLC	4/1/2023 Marlin Parks Propco LLC / Welltower Inc

* 12170 Cortez Blvd Operations LLC No Controlling Interest Provided
 **195 Mattie M Kelly 4 different controlling Interest
 *** 777 Ninth Street No Controlling Interest Provided
 ****West Altamonte No Controlling Interest Provided

July 25, 2024

	Claimant Last Name	Claimant First Name	Debtor Name	Street Address	New Owner/Licensee (Transferee)	Controlling Interest	Operator Date Change	Real Property Owner LLC
71	Ash	Avery	9311 South Orange Blossom Trail Operations, LLC	9311 S. Orange Blossom Trl Orlando, FL 32837	Parks Operating LLC	Parks Holdco LLC	4/1/2023	Marlin Parks Propco LLC / Welltower Inc
72	Scott	Moses	9355 San Jose Boulevard Operations, LLC	9355 San Jose Blvd Jacksonville, FL 32257	San Jose Blvd OPCO LLC	San Jose Parent LLC	9/1/2023	9355 San Jose Boulevard Fl Owner LLC / Welltower Inc
73	Sullivan	Timothy	9355 San Jose Boulevard Operations, LLC	9355 San Jose Blvd Jacksonville, FL 32257	San Jose Blvd OPCO LLC	San Jose Parent LLC	9/1/2023	9355 San Jose Boulevard Fl Owner LLC / Welltower Inc
74	Barrow	Rebecca	Baya Nursing and Rehabilitation, LLC	587 SE Ermine Ave Lake City, FL 32025	Baya Nursing and Rehabilitation, LLC	Consulate MZHBS Leaseholdings LLC	8/1/2013	Baya Realty LLC
75	Meyer	Veron	Baya Nursing and Rehabilitation, LLC	587 SE Ermine Ave Lake City, FL 32025	Baya Nursing and Rehabilitation, LLC	Consulate MZHBS Leaseholdings LLC	8/1/2013	Baya Realty LLC
76	Paul-Bennett	Karen	Baya Nursing and Rehabilitation, LLC	587 SE Ermine Ave Lake City, FL 32025	Baya Nursing and Rehabilitation, LLC	Consulate MZHBS Leaseholdings LLC	8/1/2013	Baya Realty LLC
77	Collins	Gerald	Baya Nursing and Rehabilitation, LLC	587 SE Ermine Ave Lake City, FL 32025	Baya Nursing and Rehabilitation, LLC	Consulate MZHBS Leaseholdings LLC	8/1/2013	Baya Realty LLC
78	Mitchell	Doris	Brandon Facility Operations, LLC	701 Victoria St Brandon, FL 33510	Brandon Heath OPCO LLC	Brandon Member LLC	4/1/2022	Crea Brandon C LLC
79	Padron	Marina	Floridean Facility Operations, LLC	47 NW 32nd PL Miami, FL 33125	Floridian Facility Operations LLC	Consulate NHCG Leaseholdings LLC	2/1/2015	Floridean Realty Group LLC
80	Donald	Charles	Jacksonville Facility Operations, LLC	4101 Southpoint DR E Jacksonville, FL 32216	Southpoint Drive East OPCO LLC	Southpoint Parent LLC	9/1/2023	Marlin Raydiant Jacksonville Propco LLC / Welltower Inc
81	Hall	James	Jacksonville Facility Operations, LLC	4101 Southpoint DR E Jacksonville, FL 32216	Southpoint Drive East OPCO LLC	Southpoint Parent LLC	9/1/2023	Marlin Raydiant Jacksonville Propco LLC / Welltower Inc
82	Graham	Madeline	Jacksonville Facility Operations, LLC	4101 Southpoint DR E Jacksonville, FL 32216	Southpoint Drive East OPCO LLC	Southpoint Parent LLC	9/1/2023	Marlin Raydiant Jacksonville Propco LLC / Welltower Inc
83	Clavijo	Rosenda	Kissimmee Facility Operations, LLC	2511 N John Young PKWY Kissimmee, FL 34741	Kissimmee OPCO LLC	Kissimmee Member LLC	4/1/2022	Crea Kissimmee LLC
84	Owens	Lular	Kissimmee Facility Operations, LLC	2511 N John Young PKWY Kissimmee, FL 34741	Kissimmee OPCO LLC	Kissimmee Member LLC	4/1/2022	Crea Kissimmee LLC
85	Gager	Ehud	Kissimmee Facility Operations, LLC	2511 N John Young PKWY Kissimmee, FL 34741	Kissimmee OPCO LLC	Kissimmee Member LLC	4/1/2022	Crea Kissimmee LLC
86	Hause	Mary	Melbourne Facility Operations, LLC	3033 Sarno Rd Melbourne, FL 32934	Melbourne OPCO LLC	Melbourne Member LLC	4/1/2022	Crea Melbourne LLC
87	Celestin	Sylvia	Miami Facility Operations, LLC	800 NW 95th St Miami, FL 33150	Franco SNF Operations LLC	Franco SNF Operations Holdings LLC	4/1/2022	Crea Franco LLC
88	Brown-Smith	Anna	Miami Facility Operations, LLC	800 NW 95th St Miami, FL 33150	Franco SNF Operations LLC	Franco SNF Operations Holdings LLC	4/1/2022	Crea Franco LLC
89	Rojas	Aldermaro	Miami Facility Operations, LLC	800 NW 95th St Miami, FL 33150	Franco SNF Operations LLC	Franco SNF Operations Holdings LLC	4/1/2022	Crea Franco LLC
90	Walker	Louise	Miami Facility Operations, LLC	800 NW 95th St Miami, FL 33150	Franco SNF Operations LLC	Franco SNF Operations Holdings LLC	4/1/2022	Crea Franco LLC
91	Martinez	Luz	New Port Richey Facility Operations, LLC	8417 Old County Rd 54 New Port Richey, FL 34653	New Port Richey OPCO LLC	New Port Richey Member LLC	4/1/2022	Crea New Port Richey LLC
92	Burdieri	Theresa Mary	North Fort Myers Facility Operations, LLC	991 Pondella RD North Fort Myers FL 33903	Pondella Road OPCO LLC	Pondella Parent LLC	9/1/2023	Marlin Raydiant Fort Myers, Propco LLC / Welltower Inc
93	Thomson	Michael	North Fort Myers Facility Operations, LLC	991 Pondella RD North Fort Myers FL 33903	Pondella Road OPCO LLC	Pondella Parent LLC	9/1/2023	Marlin Raydiant Fort Myers, Propco LLC / Welltower Inc
94	Davis	Larry	North Fort Myers Facility Operations, LLC	991 Pondella RD North Fort Myers FL 33903	Pondella Road OPCO LLC	Pondella Parent LLC	9/1/2023	Marlin Raydiant Fort Myers, Propco LLC / Welltower Inc
95	White	Jessie Mae	Orange Park Facility Operations, LLC	1215 Kingsley Ave Orange Park, FL 32073	1215 Kingsley Ave OPCO LLC	1215 Kingsey Ave OPCO Parent LLC	12/1/2023	
96	Jones	Juanita	Port Charlotte Facility Operations, LLC	18480 Cochran Blvd Port Charlotte, FL 33948	Port Charlotte OPCO LLC	Port Charlotte Member LLC	5/3/2022	18400 Cochran BLVD LLC / Altus Group
97	Murison	David	Port Charlotte Facility Operations, LLC	18480 Cochran Blvd Port Charlotte, FL 33948	Port Charlotte OPCO LLC	Port Charlotte Member LLC	5/3/2022	18400 Cochran BLVD LLC / Altus Group
98	Nielsen	Martin	West Altamonte Facility Operations, LLC	1099 West Town Parkway Altamonte Springs, FL 32714	West Altamonte OPCO LLC		5/3/2022	Crea W Altamonte LLC / Altus Group
99	Rousseau	Daniel	West Altamonte Facility Operations, LLC	1099 West Town Parkway Altamonte Springs, FL 32714	West Altamonte OPCO LLC		5/3/2022	Crea W Altamonte LLC / Altus Group
100	Taylor	Catherine	West Altamonte Facility Operations, LLC	1099 West Town Parkway Altamonte Springs, FL 32714	West Altamonte OPCO LLC		5/3/2022	Crea W Altamonte LLC / Altus Group

* 12170 Cortez Blvd Operations LLC No Controlling Interest Provided

**195 Mattie M Kelly 4 different controlling Interest

*** 777 Ninth Street No Controlling Interest Provided

****West Altamonte No Controlling Interest Provided

1010 Carpenters Way Operations LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 1010 Carpenters Way Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

**1120 West Donegan Avenue
Operations LLC,**

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 1120 West Donegan Avenue Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

11565 Harts Road Operations LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 11565 Harts Road Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

**195 Mattie M. Kelly Boulevard
Operations, LLC,**

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 195 Mattie M. Kelly Boulevard Operations, LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

12170 Cortez Boulevard Operations LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 12170 Cortez Boulevard Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

1465 Oakfield Drive Operations LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 1465 Oakfield Drive Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

15204 West Colonial Drive Operations LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 15204 West Colonial Drive Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

**1550 Jess Parrish Court Operations
LLC,**

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 1550 Jess Parrish Court Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

1615 Miami Road Operations LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 1615 Miami Road Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

1851 Elkcam Boulevard Operations LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 1851 Elkcam Boulevard Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

**216 Santa Barbara Boulevard
Operations LLC,**

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 216 Santa Barbara Boulevard Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

**2333 North Brentwood Circle
Operations LLC,,**

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 2333 North Brentwood Circle Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

2826 Cleveland A venue Operations LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 2826 Cleveland A venue Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

3001 Palm Coast Parkway Operations LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 3001 Palm Coast Parkway Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

3101 Ginger Drive Operations LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 3101 Ginger Drive Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

3735 Evans Avenue Operations LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 3735 Evans Avenue Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

3920 Rosewood Way Operations, LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 3920 Rosewood Way Operations, LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

4200 Washington Street Operations LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 4200 Washington Street Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

**4641 Old Canoe Creek Road
Operations LLC,**

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 4641 Old Canoe Creek Road Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

**518 West Fletcher Avenue Operations
LLC,**

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 518 West Fletcher Avenue Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

5405 Babcock Street Operations LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 5405 Babcock Street Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

6305 Cortez Road West Operations LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 6305 Cortez Road West Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

6414 13th Road South Operations LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 6414 13th Road South Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

6700 NW 10th Place Operations LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 6700 NW 10th Place Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

**702 South Kings Avenue Operations
LLC,**

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 702 South Kings Avenue Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

710 North Sun Drive Operations LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 710 North Sun Drive Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

741 South Beneva Road Operations LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 741 South Beneva Road Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

777 Ninth Street North Operations LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 777 Ninth Street North Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

7950 Lake Underhill Road Operations LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 7950 Lake Underhill Road Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

**9311 South Orange Blossom Trail
Operations LLC,**

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 9311 South Orange Blossom Trail Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

**9355 San Jose Boulevard Operations
LLC,**

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of 9355 San Jose Boulevard Operations LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

**Baya Nursing and Rehabilitation,
LLC,**

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of Baya Nursing and Rehabilitation, LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

Brandon Facility Operations, LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of Brandon Facility Operations, LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

Consulate Facility Leasing, LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of Consulate Facility Leasing, LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

Epsilon Health Care Properties, LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of Epsilon Health Care Properties, LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

Floridian Facility Operations, LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of Floridian Facility Operations, LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

Jacksonville Facility Operations, LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of Jacksonville Facility Operations, LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

Josera, LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of Josera, LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

Kissimmee Facility Operations, LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of Kissimmee Facility Operations, LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

Lidenskab, LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of Lidenskab, LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

LV CHC Holdings I, LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of LV CHC Holdings I, LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

Melbourne Facility Operations, LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of Melbourne Facility Operations, LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

Miami Facility Operations, LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of Miami Facility Operations, LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

New Port Richey Facility Operations, LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of New Port Richey Facility Operations, LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

**North Fort Myers Facility Operations,
LLC,**

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of North Fort Myers Facility Operations, LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

**Port Charlotte Facility Operations,
LLC,**

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of Port Charlotte Facility Operations, LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

Tallahassee Facility Operations, LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of Tallahassee Facility Operations, LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

Tosturi, LLC,

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of Tosturi, LLC, who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

**West Altamonte Facility Operations,
LLC,**

By: _____
Its: _____

STATE OF FLORIDA

COUNTY OF _____

BEFORE ME, the undersigned authority, this ___ day of _____, 2024, by means of physical presence or online notarization personally appeared _____, as authorized representative of West Altamonte Facility Operations, LLC who deposes and says that the foregoing answers to Interrogatories are true and correct. _____ is either personally known to me or produced _____ as identification.

Notary Public, State at Large
(commission number and expiration)

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

In re:

LAVIE CARE CENTERS, LLC, et. al.,

Case No.: 24-55507-PMB

Chapter 11

Debtor.

Cases Jointly Administered

**RECOVERY CORP.'S REQUEST FOR PRODUCTION TO
FLORIDA DIVESTCO DEBTORS PERTAINING TO MOTION TO CONVERT
FLORIDA DIVESTCO REORGANIZATIONS TO CHAPTER 7 LIQUIDATIONS**

Pursuant to Federal Rule of Bankruptcy Procedure Federal Rule of Civil Procedure 34 and other applicable law, Healthcare Negligence Settlement Recovery Corp. (the “Recovery Corp.”), by and through its undersigned counsel, requests that fifty (50) business entities (collectively, the “Florida DivestCo Debtors”)¹ identified as debtors in

¹ 1010 Carpenters Way Operations LLC, 1120 West Donegan Avenue Operations LLC, 11565 Harts Road Operations LLC, 195 Mattie M. Kelly Boulevard 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 A venue Operations LLC, 3001 Palm Coast Parkway Operations LLC, 3101 Ginger Drive Operations LLC, 3735 Evans Avenue Operations LLC, 3920 Rosewood Way Operations, LLC, 4200 Washington Street Operations LLC, 4641 Old Canoe Creek Road Operations LLC, 518 West Fletcher A venue 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 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.

the above-captioned jointly administered reorganizations respond to this request for production in compliance with the definitions and instructions additionally set forth therein within thirty (30) days after service of this request or at such other reasonable time as might be mutually agreed upon by the duly authorized attorneys of the parties.

DATED this 6th day of August, 2024.

/s/ John A. Anthony

JOHN A. ANTHONY, ESQUIRE

Florida Bar Number: 0731013

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Tampa, Florida 33602

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Attorneys for Recovery Corp.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished on August 6, 2024, by electronic means to:

La Vie Care Centers, LLC
c/o Ankura Consulting Group, LLC
485 Lexington Avenue, 10th Floor
New York, New York 10017
Attn: M. Benjamin Jones
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Debtor

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/s/ John A. Anthony

ATTORNEY

EXHIBIT “A”

DEFINITIONS AND INSTRUCTIONS

The following definitions and instructions are to be used or referred to in connection with “Recovery Corp.’s Request for Production to Florida DivestCo Debtors Pertaining to Motion to Convert Florida DivestCo Reorganizations to Chapter 7 Liquidations” (this “Production Request”):

1. The term “Recovery Corp.” shall refer to Healthcare Negligence Settlement Recovery Corp., together with any past or present shareholders, officers, directors, employees, accountants, attorneys, or other agents of Recovery Corp.

2. The term “Florida Claims” shall refer to all causes of action, claims, and other rights that Recovery Corp. possesses against any Debtors, Litigation Targets, or others that are relevant to nursing home negligence of the Florida DivestCo Debtors, the Divested Florida SNFs, or the circumstances under which the Divested Florida SNFs were transferred to the Florida SNF Transferees, whether known or unknown, asserted or unasserted, meritorious or frivolous, disputed or undisputed, liquidated or unliquidated, fixed or contingent.

3. The term “Florida Claimants” shall refer to the Florida-based claimants who have assigned their Florida Claims to Recovery Corp., such claims having originally arisen based upon nursing home negligence at Divested Florida SNFs formerly owned by the various Florida DivestCo Debtors.

4. The term “Claimant Firms” shall refer to the seventeen (17) law firms representing the Florida Claimants nursing home negligence victims’ claims after their Florida Claims arose.

5. The term “Florida Lawsuits” shall refer to a set of lawsuits and related litigation activities commenced by the Claimant Firms on behalf of the Florida Claimants against the Florida DivestCo Debtors and others to recover on nursing home negligence grounds arising under Florida Statutes §400.001, et seq.

6. The term “Miami Action” shall refer to an action in the complex business division of the Circuit Court in and for Miami-Dade County, Florida (the “Miami Court”) to recover what are alleged to be avoidable transfers, and for other relief, styled Healthcare Negligence Settlement Recovery Corp. v. 5405 Babcock Street Operations, LLC, et al., Case No. 2024-007342-CA-01, initiated on April 22, 2024.

7. The term “Miami Defendants” shall refer to all defendants named in the Miami Action.

8. The term “Debtors” shall refer to the 282 chapter 11 debtors, together with any members, managing members, employees, accountants, attorneys, or other agents of the Debtors.

9. The term “Reorganizations” shall refer to the 282 chapter 11 reorganizations, jointly administered under Case No. 24-55507-PMB, In re LaVie Care Centers, LLC, et al., before the United States Bankruptcy Court, Northern District of Georgia, Atlanta Division.

10. The term “Parent Debtor” shall refer to LaVie Care Centers, LLC, together with any members, managing members, employees, accountants, attorneys, or other agents of the Parent Debtor.

11. The term “OpCo Debtors” shall refer to a subset of 43 Debtors who have owned and/or operated one or more SNF since the Petition Dates.

12. The term “DivestCo Debtors” shall refer to a subset of Debtors who owned and/or operated one or more SNF prior to the Petition Dates, but transferred ownership or control of their business and/or assets such that they are presently de facto shell entities.

13. The term “Florida DivestCo Debtors” shall refer to a subset of DivestCo Debtors who owned and/or operated one or more SNF at the time that nursing home negligence claims arose under Florida Statutes §400.001, et seq. that gave rise to the Florida Lawsuits.

14. The term “Florida DivestCo Reorganizations” shall refer to a subset of the Reorganizations that correspond to the Florida DivestCo Debtors.

15. The term “Non-Debtor Related Entities” shall refer to the parent of the Parent Debtor, as well as all affiliates of the Parent Debtor, and all subsidiaries of those affiliates, including without limitation Pourlessions, LLC, d/b/a Synergy Healthcare Services, a/k/a Synergy Healthcare Services, Inc. (“Synergy”), NSPRMC, LLC, d/b/a NSPIRE Healthcare (“NSPIRE”) and Aspire Healthcare, LLC (“Aspire”), and all Florida SNF Transferees who are owned and/or controlled by any of the Non-Debtor Related Entities.

16. The term “SNFs” shall refer to skilled nursing facilities, to the extent previously or currently owned or operated by any of the Debtors.

17. The term “Divested Florida SNFs” shall refer to the subset of SNFs from which the Florida DivestCo Debtors were divested prior to the Petition Dates.

18. The term “Florida SNF Transferees” shall refer to any owner or operator of one or more SNF based in Florida who has owned and/or operated such SNF from or after the moment that one or more of the Florida DivestCo Debtors was divested of that SNF.

19. The term “Current Florida SNFs” shall refer to a potential subset of SNFs located in Florida and owned and/or operated by some of the OpCo Debtors as of the Petition Dates.

20. The term “Dias Defendants” shall refer to Dan Dias, Esquire and the law firm of Dias & Associates, together with any members, managing members, employees, accountants, attorneys, or other agents of the Dias Defendants.

21. The term “Florida Landlords” shall refer to every past or present landlord for any Florida SNF from January 1, 2021, through the Petition Dates, including without limitation the “Omega Parties” as defined in the DIP Finance Motion and the Bidding Procedures Motion.

22. The term “DIP Finance Motion” shall refer to “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” [Doc. 15].

23. The term “Bidding Procedures Motion” shall refer 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” [Doc. 104].

24. The term “Combined Plan” shall refer to “Debtors’ Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization” [Doc. 273], filed in the Reorganizations on July 23, 2024.

25. The term “Litigation Targets” shall refer to any of the Miami Defendants, any of the Florida Landlords, all the Florida SNF Transferees, Non-Debtor Related Entities, and any individual or entity intended to receive a release under relevant provisions of the DIP Finance Motion, Bidding Procedures Motion, or Combined Plan.

26. The term “Creditors Committee” shall refer to the June 13, 2024, appointment of the Official Committee of Unsecured Creditors in these Reorganizations by Office of the United States Trustee.

27. The term “Petition Dates” shall refer to the date the Petition was filed, that being June 2, 2024.

28. The term “Fraudulent Transfer Schedule” shall refer to the schedule attached hereto as Exhibit “A.”

29. The term “Florida Schedules” shall refer collectively to all information relating to the Florida DivestCo Debtors set forth in the Debtors’ schedules and statements of affairs filed in these Reorganizations.

30. The term “Dismissal Motion” shall refer to the motion to dismiss or convert the Florida DivestCo Reorganizations filed by Recovery Corp. on or as of August 5, 2024, to which this discovery is tailored.

31. The term “Admissions Request” shall refer to “Recovery Corp.’s Requests for Admission to Florida DivestCo Debtors Pertaining to Motion to Convert Florida DivestCo Reorganizations to Chapter 7 Liquidations,” served simultaneously herewith.

32. The term “Interrogatories” shall refer to the “Recovery Corp.’s First Set of Interrogatories to Florida DivestCo Debtors Pertaining to Motion to Convert Florida DivestCo Reorganizations to Chapter 7 Liquidations” (the “Interrogatories”), served simultaneously herewith.

33. The term “control,” when applied to a business entity, shall mean the ownership, individually, singularly, or together with a spouse (as co-obligor, as tenants by the entirety, or otherwise), on in conjunction with any person, partnership, corporation, or other business entity (to the extent also so controlled) of more than half of the authorized, issued, and outstanding shares of such business entity. This term shall also include a de facto control of such business entity, including exercise of day-to-day responsibility for business or financial affairs of such business entity.

34. The term “identify,”

(a) when used in reference to any individual person, shall mean to state that individuals full name, present address, present employer, and occupation;

(b) when used as reference to a person other than an individual, shall mean to state the legal nature of that person (e.g., a corporation, partnership, trust, estate, association, company), and to state its full name, address, and principal place of business; and

(c) when used in reference to a document (or documents), shall mean to state the document's author, signatory, addressee, title, date, and page length.

35. The term "or" shall be construed by their conjunctively or disjunctively to bring within the scope of these requests any information which might otherwise be construed to be outside their scope.

36. The term "document" shall mean any and all information in tangible form, including without limitation, all letters, telegrams, telexes, teletypes, correspondence, e-mail transmissions and comparable computerized communications, text messages, MMS, SMS, iMessage, WhatsApp, Facebook Messenger, contracts, drafts, agreements, notes to file, reports, memoranda, electrical or mechanical recordings or transcripts of such recordings, blueprints, flow sheets, calendar or diary entries, memoranda of telephone or personal conversations, memoranda or meetings or conferences, studies, reports, intra-office communications, manuals, newsletters, compilations, charts, graphs, compositions, bids, articles, announcements, newspaper clippings, books, records, tables, books of account, ledgers, vouchers, canceled checks, invoices, bills, opinions, certificates, promissory notes, evidence of indebtedness, and all drafts and copies of documents as herein defined, by whatever means made. Documents include ESI, and ESI should be

interpreted as a subset of documents. Documents also include Communications which should be interpreted as a subset of Documents.

37. The term “ESI” means electronically stored information and shall have the broadest definition possible under the Federal Rules of Civil Procedure and the Federal Rules of Bankruptcy Procedure, and shall include, without limitation, software, outputs resulting from the sue software (including word-processing documents, spreadsheets, database files, charts, graphs, and outlines), programming notes and instructions, electronic mail, listings of email transmittals and receipts, and all miscellaneous files and file fragments, regardless of the media on which they reside. The term ESI further includes all items stored on computers, tablets, smartphones, and removable media (including USB drives, hard disks, diskettes, cartridges, CD-ROMs, magnetic tapes, microfiche, and any other media for digital data storage or transmittal). The term ESI expressly includes all related metadata.

38. The term “including” means including without limitation and does not limit the scope of any request.

39. The term “related to” or any form thereof means to embody, record, refer to, concern, reflect, or in any manner involved or otherwise implicate the subject matter of this Production Request.

40. To the extent that any of the Florida DivestCo Debtors are unable to respond to any of the requests in this Production Request, that Florida DivestCo Debtor must set forth in detail the reasons it cannot do so.

41. To the extent that any of the Florida DivestCo Debtors considers any of the

following requests in this Production Request to be objectionable, that Florida DivestCo Debtor must respond to as much of such request or each part thereof as is not objectionable, in its view, then separately set forth the basis for such objection.

42. The repetition of definitions or instructions herein is intended to assist the Florida DivestCo Debtors in responding to and complying with this Production Request; however, such repetition shall in no way limit the application of the definitions herein.

43. Any defined term contained in this Production Request may be used, when applicable, in its possessive or plural form as reasonably applicable, as well as in masculine, feminine, or neuter form.

44. The Florida DivestCo Debtors are required to produce all described documents in all subcategories of this Production Request, and the subcategories are intended to facilitate orderly production rather than to limit the full extent of production required hereunder.

II. CATEGORIES OF DOCUMENTS TO BE PRODUCED

1. All documents that confirm, rebut, or otherwise relate to the question of whether each of the Florida DivestCo Debtors formerly operated a Florida SNF, as reflected in the Fraudulent Transfer Schedule.

2. All documents that confirm, rebut, or otherwise relate to question of whether each of the Florida Claimants is a former resident of a Florida SNF, or the legal representative of such a resident, or such resident's probate estate.

3. All documents that confirm, rebut, or otherwise relate to question of whether each of the Florida Claimants asserted a nursing home negligence claim arising under

chapter 400 Florida Statutes against a corresponding Florida DivestCo Debtor, as reflected in the Fraudulent Transfer Schedule, while said Florida DivestCo Debtor operated its Florida SNF.

4. All documents that confirm, rebut, or otherwise relate to question of whether each of the Florida Claimants retained counsel in Florida and produced a settlement with the corresponding Florida DivestCo Debtor for settlement of the nursing home negligence claim at issue, with the Dias Firm representing the Florida DivestCo Debtor.

5. All documents that confirm, rebut, or otherwise relate to question of whether each of the Florida DivestCo Debtors relinquished operational control of its Florida SNF to one of the SNF Transferees, following the date that each such Florida Claimant asserted a claim against the corresponding Florida DivestCo Debtor, as reflected in the Fraudulent Transfer Schedule.

6. All documents that confirm, rebut, or otherwise relate to question of whether when each of the Florida DivestCo Debtors relinquished operational control of its Florida SNF to one of the SNF Transferees, as reflected in the Fraudulent Transfer Schedule, sums were due from each such Florida DivestCo Debtor to each such Florida Claimant under the settlements previously reached with the Dias Firm and its clients.

7. All documents that confirm, rebut, or otherwise relate to question of whether the Parent Debtor is the direct or indirect parent of each of the Florida DivestCo Debtor, as reflected in the Fraudulent Transfer Schedule.

8. All documents that confirm, rebut, or otherwise relate to the question of whether Synergy/Consulate is and has been the direct or indirect parent of the Parent

Debtor and the Parent Debtor Affiliates since at least January 1, 2021.

9. All documents that confirm, rebut, or otherwise relate to the question of whether one of the Parent Debtor Affiliates is and has been a direct or indirect parent of each of the SNF Transferees since at least January 1, 2021.

10. All documents that confirm, rebut, or otherwise relate to question of whether when each of the Florida DivestCo Debtors relinquished operational control of its Florida SNF to one of the SNF Transferees, as reflected in the Fraudulent Transfer Schedule, neither the corresponding SNF Transferee nor the corresponding Parent Debtor Affiliate directly received any value on account of the relinquishment of operational control, or in connection with any other concurrent transaction or occurrence.

11. All documents that confirm, rebut, or otherwise relate to question of whether when each of the Florida DivestCo Debtors relinquished operational control of its Florida SNF to one of the SNF Transferees, as reflected in the Fraudulent Transfer Schedule, neither the corresponding SNF Transferee nor the corresponding Parent Debtor Affiliate indirectly received any value on account of the relinquishment of operational control, or in connection with any other concurrent transaction or occurrence, such as payment of any debt owed by each such Florida DivestCo Debtor.

12. All documents that confirm, rebut, or otherwise relate to question of whether the transfer of operational control of the Florida SNFs from the Florida DivestCo Debtors to the SNF Transferees conferred a valuable benefit upon each of the SNF Transferees, and therefore to the corresponding Parent Debtor Affiliates.

13. All documents that reasonably relate to or reflect communications between

the Dias Defendants and the Claimant Firms at any point in time from January 1, 2021, through the Petition Dates regarding the Florida Claims, the Florida Claimants, the Florida Lawsuits, the settlement of any or all the foregoing, and/or the business, financial, or legal affairs of any of the Florida DivestCo Debtors or their corresponding Divested Florida SNFs.

14. All documents that reasonably relate to or reflect the ownership, management, and/or control of each of the Florida DivestCo Debtors at any time from January 1, 2021, through the present.

15. All documents that reasonably relate to or reflect the ownership, management, and/or control of each of the Florida SNF Transferees at any time from January 1, 2021, through the present.

16. All documents that reasonably relate to or reflect any ownership, management, or control of any of the Florida DivestCo Debtors by Synergy.

17. All documents that reasonably relate to or reflect any ownership, management, or control of any of the Florida SNF Transferees by Synergy, NSPIRE, Aspire, Raydiant, or any other subsidiary or affiliate of Synergy.

18. All documents that reasonably relate to or reflect the business, financial, and legal relationship of the Florida DivestCo Debtors to any of the other Debtors, including any instances in which any of them (a) funded losses of one or more of the Florida DivestCo Debtors, (b) lent money to one or more of the Florida DivestCo Debtors, (c) combined business functions, assets, or personnel with any of the Florida DivestCo Debtors, or (d) engaged in any other relations apart from common ownership under the Parent Debtor.

19. All documents that reasonably relate to or reflect a substantial identity between the Florida DivestCo Debtors and any other Debtors in business, financial, or legal terms.

20. All documents that reasonably relate to or reflect the existence of some harm to be avoided or some benefit to be achieved by disregarding the separate corporate existence of each of the Florida DivestCo Debtors vis-à-vis the other Debtors.

21. All documents that reasonably relate to or reflect the proposition that any of the Florida Claimants ever relied on the consolidated credit of one or more of the Debtors, in addition to a single specific Florida DivestCo Debtor expressly tied to a specific nursing home negligence claim at a specific Divested Florida SNF that gave rise to a specific corresponding Florida Claim.

22. All documents that reasonably relate to or reflect the contractual relations between each Florida DivestCo Debtors and its corresponding Florida Landlord, including leases, lease amendments, master lease agreements, payments schedules, invoices, collection letters, eviction notices and related materials, work-out agreements, and any transactional documents requiring participation, approval, or consent from such Florida Landlord.

23. All documents that reasonably relate to or reflect the existence of operations transfer agreements (“OTA”), change of ownership filings (“CHOW”), change of operator filings (“CHOP”), and other filings, applications, and submissions to the Florida Agency for Health Care Administration (“AHCA”), filed by or on or behalf of any of the Florida DivestCo Debtors or Florida SNF Transferees in connection with any transaction or

occurrence in which any of the Florida DivestCo Debtors relinquished control of operation of any Divested Florida SNF.

24. All documents reflecting lay or expert opinions as to the value transferred by each of the Florida DivestCo Debtors when divested of each of its corresponding Divested Florida SNFs, including appraisals, balance sheets, opinion letters, closing statements, or any other documents that would explain why the corresponding Florida SNF Transferees found it beneficial to take title.

25. All documents that reasonably relate to or reflect notification given to any Florida Claimants in connection with any OTA, CHOW, CHOP, or other filing relating to any transaction or occurrence in which any of the Florida DivestCo Debtors relinquished control of operation of any Divested Florida SNF.

26. All documents that reasonably relate to or reflect communications between any of the Florida DivestCo Debtors, or on their behalf, with AHCA, regarding any aspect or operation of the Divested Florida SNF.

27. All documents that reasonably relate to or reflect communications between any of the Florida SNF Transferees, or on their behalf, with AHCA, regarding any aspect or operation of the Divested Florida SNF.

28. All documents that reasonably relate to or reflect the business, financial, or legal terms under which any of the Florida DivestCo Debtors relinquished control of operation of any Divested Florida SNF.

29. All documents that reasonably relate to or reflect the existence of assets, liabilities, income, expenses, business operations, business plans, or any other

accountments of the going concern for any of the Florida DivestCo Debtors at any time from January 1, 2021, through the present.

30. All documents that reasonably relate to or reflect the receipt by any of the Florida DivestCo Debtors of any value derived from any loan funded or to be funded pursuant to any order entered or to be entered upon consideration of the DIP Finance Motion.

31. All documents that reasonably relate to or reflect the existence of any asset of any of the Florida DivestCo Debtors to be included in any bidding procedures, marketing, or sale of any property pursuant to any order that the Debtors would seek to obtain from the Court upon consideration of the Bidding Procedures Motion.

32. All documents that reasonably relate to or reflect which specific individuals or entities the Debtors seek to release as part of the relief they request in the DIP Finance Motion.

33. All documents that reasonably relate to or reflect which specific individuals or entities the Debtors seek to release as part of the relief they request in the Bidding Procedures Motion.

34. All documents that reasonably relate to or reflect which specific individuals or entities the Debtors seek to release as part of the relief they request in seeking confirmation of the Combined Plan.

35. All documents that reasonably relate to or reflect director and officer insurance, legal malpractice insurance, errors and omissions insurance, tail coverages, and any other insurance coverages that potentially cover any claims asserted against the Miami

Defendants, and/or any claims that might be asserted in connection with any transaction or occurrence leading to a Florida DivestCo Debtor no longer owning or operating a business tied to a specific Divested Florida SNF.

36. All documents that reasonably relate to or reflect the receipt of any consideration by any Florida Landlords contemporaneously with or pursuant to any transaction leading to a Florida DivestCo Debtor no longer owning or operating a business tied to a specific Divested Florida SNF.

37. All documents that reasonably relate to or reflect positions held by Dan Dias, Esquire, as an officer, director, or counsel for any of the Debtors, the Non-Debtor Related Entities, the Florida SNF Transferees, or any other Litigation Targets, from January 1, 2021, through the present.

38. All documents that reasonably relate to or reflect the accuracy or inaccuracy of the data set forth in the Fraudulent Transfer Schedule.

Exhibit “A”

	Claimant Last Name	Claimant First Name	Debtor Name	Street Address	New Owner/Licensee (Transferee)	Controlling Interest	Operator Date Change	Real Property Owner LLC
1	Cobb	Doneatha	1010 Carpenters Way Operations, LLC	1010 Carpenters Way Lakeland, FL 33809	Wedgewood Operating LLC	Wedgewood Holdco LLC	9/5/2023	1010 Carpenters Way FL Owner LLC / Welltower Inc
2	Rigas	Gail	1120 West Donegan Avenue Operations, LLC	1120 W, Donegan Ave Kissimmee, FL 34741	West Donegan AVE SNF OPCO LLC	West Donegan SNF Parent LLC	9/1/2023	1120 West Donegan Avenue FL Owner LLC / Welltower Inc
3	Acededo	Sharon	1120 West Donegan Avenue Operations, LLC	1120 W, Donegan Ave Kissimmee, FL 34741	West Donegan AVE SNF OPCO LLC	West Donegan SNF Parent LLC	9/1/2023	1120 West Donegan Avenue FL Owner LLC / Welltower Inc
4	Mackey	George	1120 West Donegan Avenue Operations, LLC	1120 W, Donegan Ave Kissimmee, FL 34741	West Donegan AVE SNF OPCO LLC	West Donegan SNF Parent LLC	9/1/2023	1120 West Donegan Avenue FL Owner LLC / Welltower Inc
5	McKinnion-Murphy	Netti	1120 West Donegan Avenue Operations, LLC	1120 W, Donegan Ave Kissimmee, FL 34741	West Donegan AVE SNF OPCO LLC	West Donegan SNF Parent LLC	9/1/2023	1120 West Donegan Avenue FL Owner LLC / Welltower Inc
6	Lizardi	Miriam	1120 West Donegan Avenue Operations, LLC	1120 W, Donegan Ave Kissimmee, FL 34741	West Donegan AVE SNF OPCO LLC	West Donegan SNF Parent LLC	9/1/2023	1120 West Donegan Avenue FL Owner LLC / Welltower Inc
7	McHenry	Vickie	11565 Harts Road Operations, LLC	11565 Harts Rd Jacksonville, FL 32218	11565 Harts Road Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012	Beverly Investment Properties
8	Barrett	Harry Wayne	11565 Harts Road Operations, LLC	11565 Harts Rd Jacksonville, FL 32218	11565 Harts Road Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012	Beverly Investment Properties
9	Mazza	Alfonso	12170 Cortez Boulevard Operations, LLC	12170 Cortez Blvd Brooksville, FL 34613	12170 Cortez Blvd Opc LLC		12/1/2023	FC Encore Brooksville II, LLC / Omega Healthcare Investors Inc
10	Perez	Suzanne	1465 Oakfield Drive Operations, LLC	1465 Oakfield Dr Brandon, FL 33511	1465 Oakfield Dr OPCO LLC	1465 Oakfield Dr OPCO Parent LLC	12/1/2023	FC Encore Brandon LLC / Omega Healthcare Investors Inc
11	Foster	Levi	15204 West Colonial Drive Operations, LLC	15204 W Colonial Dr Winter Garden, FL 34787	West Colonial Drive OPCO LLC	West Colonial Parent LLC	9/1/2023	15204 W Colonial Drive FL Owner LLC / Welltower Inc
12	Lane	Ingrid K.	1550 Jess Parrish Court Operations, LLC	1550 Jess Parrish Ct Titusville, FL 32796	Vista Manor Operating LLC	Vista Manor Holdco LLC	9/5/2023	1550 Jess Parrish Court FL Owner LLC
13	Knight	Mae	1615 Miami Road Operations, LLC	1615 Miami Rd Ft Lauderdale, FL 33316	Miami Road OPCO LLC	Miami Road Parent LLC	9/1/2023	1615 Miami Road FL Owner LLC
14	Walker	Lula Mae	1615 Miami Road Operations, LLC	1615 Miami Rd Ft Lauderdale, FL 33316	Miami Road OPCO LLC	Miami Road Parent LLC	9/1/2023	1615 Miami Road FL Owner LLC
15	Poarch	Erin	1851 Elkcam Boulevard Operations, LLC	1851 Elkcam Blvd Deltona, FL 32725	Deltona Operating LLC	Deltona Holdco LLC	9/5/2023	FC Encore Deltona LLC / Omega Healthcare Investors Inc
16	Kolbe	Richard	1851 Elkcam Boulevard Operations, LLC	1851 Elkcam Blvd Deltona, FL 32725	Deltona Operating LLC	Deltona Holdco LLC	9/5/2023	FC Encore Deltona LLC / Omega Healthcare Investors Inc
17	Knicley	Peggy	195 Mattie M. Kelly Boulevard Operations, LLC	195 Mattie M Kelly Blvd Destin, FL 32541	Destin Senior Care, LLC	Various	4/17/2023	FC Encor Destin LLC/ Omega Healthcare Investors Inc
18	Ortiz	Crispin	216 Santa Barbara Boulevard Operations, LLC	216 Santa Barbara Blvd Cape Coral, FL 33991	Santa Barbara Blvd OPCO LLC	Santa Barbara Parent LLC	11/2/2023	FC Encore Cape Coral LLC/ Omega Healthcare Investors Inc
19	Guelich	Judy	2333 North Brentwood Circle Operations, LLC	2333 N. Brentwood Cir Lecanto FL 34461	North Brentwood Circle OPCO LLC	Brentwood Parent LLC	11/2/2023	FC Encore Lecanto LLC / Omega Healthcare Investors Inc
20	Barry	John	2826 Cleveland Avenue Operations, LLC	2826 Cleveland Ave, Fort Myers, FL 33901	2826 Cleveland Avenue Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012	Decathlon Tyst LLC
21	Skow-Barr	Delano	2826 Cleveland Avenue Operations, LLC	2826 Cleveland Ave, Fort Myers, FL 33901	2826 Cleveland Avenue Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012	Decathlon Tyst LLC
22	Woodard	Chester	2826 Cleveland Avenue Operations, LLC	2826 Cleveland Ave, Fort Myers, FL 33901	2826 Cleveland Avenue Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012	Decathlon Tyst LLC
23	Milsap	Carmen	3001 Palm Coast Parkway Operations, LLC	3001 Palm Coast Parkway SE Palm Coast, FL 32137	Palm Coast PKWY OPCO LLC	Palm Coast Parent LLC	11/2/2023	FC Encore Palm Coast LLC / Omega Healthcare Investors Inc
24	Foster	Mary	3001 Palm Coast Parkway Operations, LLC	3001 Palm Coast Parkway SE Palm Coast, FL 32137	Palm Coast PKWY OPCO LLC	Palm Coast Parent LLC	11/2/2023	FC Encore Palm Coast LLC / Omega Healthcare Investors Inc
25	Blair	Bobby	3001 Palm Coast Parkway Operations, LLC	3001 Palm Coast Parkway SE Palm Coast, FL 32137	Palm Coast PKWY OPCO LLC	Palm Coast Parent LLC	11/2/2023	FC Encore Palm Coast LLC / Omega Healthcare Investors Inc
26	Powell	Tereather	3101 Ginger Drive Operations, LLC	3101 Ginger Dr Tallahassee, FL 32308	Ginger Drive OPCO LLC	Ginger Parent LLC	11/2/2023	FC Encore Core Tallahassee I LLC / Omega Healthcare Investors Inc
27	Malcomb	Buddy	3735 Evans Avenue Operations, LLC	3735 Evans Ave Fort Myers, FL 33901	Evans Avenue OPCO LLC	Evans Parent LLC	11/2/2023	FC Encore Fort Myers LLC / Omega Healthcare Investors Inc
28	McGhee	David	3735 Evans Avenue Operations, LLC	3735 Evans Ave Fort Myers, FL 33901	Evans Avenue OPCO LLC	Evans Parent LLC	11/2/2023	FC Encore Fort Myers LLC / Omega Healthcare Investors Inc
29	Rucker-Fluellen	Mildred	3735 Evans Avenue Operations, LLC	3735 Evans Ave Fort Myers, FL 33901	Evans Avenue OPCO LLC	Evans Parent LLC	11/2/2023	FC Encore Fort Myers LLC / Omega Healthcare Investors Inc
30	Moran	Doris	3735 Evans Avenue Operations, LLC	3735 Evans Ave Fort Myers, FL 33901	Evans Avenue OPCO LLC	Evans Parent LLC	11/2/2023	FC Encore Fort Myers LLC / Omega Healthcare Investors Inc
31	Griffin	John	3920 Rosewood Way Operations, LLC	3920 Rosewood Way Orlando, FL 32808	3920 Rosewood Way OPCO LLC	3920 Rosewood Way OPCO Parent LLC	12/1/2023	3920 Rosewood Way FL Owner LLC / Welltower Inc
32	Joseph	Maria L.	4200 Washington Street Operations, LLC	4200 Washington St Hollywood, FL 33021	Hillcrest OPCO LLC	Hillcrest OPCO Holdings LLC	9/29/2023	Hillcrest Propco LLC
33	Antoine	Philomene	4200 Washington Street Operations, LLC	4200 Washington St Hollywood, FL 33021	Hillcrest OPCO LLC	Hillcrest OPCO Holdings LLC	9/29/2023	Hillcrest Propco LLC
34	Manuel	Anthony	4200 Washington Street Operations, LLC	4200 Washington St Hollywood, FL 33021	Hillcrest OPCO LLC	Hillcrest OPCO Holdings LLC	9/29/2023	Hillcrest Propco LLC
35	Mompont	Juliette	4200 Washington Street Operations, LLC	4200 Washington St Hollywood, FL 33021	Hillcrest OPCO LLC	Hillcrest OPCO Holdings LLC	9/29/2023	Hillcrest Propco LLC

* 12170 Cortez Blvd Operations LLC No Controlling Interest Provided

**195 Mattie M Kelly 4 different controlling Interest

*** 777 Ninth Street No Controlling Interest Provided

****West Altamonte No Controlling Interest Provided

Claimant Last Name	Claimant First Name	Debtor Name	Street Address	New Owner/Licensee (Transferee)	Controlling Interest	Operator Date Change	Real Property Owner LLC
36	Oegar	Avram	4200 Washington Street Operations, LLC	4200 Washington St Hollywood, FL 33021	Hillcrest OPCO LLC	Hillcrest OPCO Holdings LLC	9/29/2023 Hillcrest Propco LLC
37	Pina	Mirelle	4200 Washington Street Operations, LLC	4200 Washington St Hollywood, FL 33021	Hillcrest OPCO LLC	Hillcrest OPCO Holdings LLC	9/29/2023 Hillcrest Propco LLC
38	Tillman	Linda	4200 Washington Street Operations, LLC	4200 Washington St Hollywood, FL 33021	Hillcrest OPCO LLC	Hillcrest OPCO Holdings LLC	9/29/2023 Hillcrest Propco LLC
39	Vargas	Gerado	4200 Washington Street Operations, LLC	4200 Washington St Hollywood, FL 33021	Hillcrest OPCO LLC	Hillcrest OPCO Holdings LLC	9/29/2023 Hillcrest Propco LLC
40	Gibson	Benny	4641 Old Canoe Creek Road Operations, LLC	4641 Old Canoe Creek Road Sanit Cloud, FL 34769	541 Old Canoe Creek Rd OPCO LLC	541 Old Canoe Creek Rd OPCO Parent LLC	12/1/2023 541 Old Canoe Creek Rd FI Owner LLC / Welltower Inc
41	Diaz	Jose R.	518 West Fletcher Avenue Operations, LLC	518 W Fletcher Ave Tampa, FL 33612	West Fletcher Ave OPCO LLC	West Fletcher Parent LLC	9/1/2023 518 West Fletcher Avenue FL Owner LLC / Welltower Inc
42	Hill	Roosevelt	518 West Fletcher Avenue Operations, LLC	518 W Fletcher Ave Tampa, FL 33612	West Fletcher Ave OPCO LLC	West Fletcher Parent LLC	9/1/2023 518 West Fletcher Avenue FL Owner LLC / Welltower Inc
43	Abel	Bebee	5405 Babcock Street Operations, LLC	5405 Babcock St NE Palm Bay, FL 32905	5405 Babcock St NE OPCO LLC	5405 Babcock St NE OPCO Parent LLC	12/1/2023 5405 Babcock St NE FI Owner LLC / Welltower Inc
44	Holt	Mary	6305 Cortez Road West Operations, LLC	6305 Cortez Rd W Bradenton, FL 34210	6305 Cortez RD W OPCO LLC	6305 Cortez RD W OPCO Parent LLC	12/1/2023 FC Encore Bradenton LLC / Omega Healthcare Investors Inc
45	Druelle	Catherine	6305 Cortez Road West Operations, LLC	6305 Cortez Rd W Bradenton, FL 34210	6305 Cortez RD W OPCO LLC	6305 Cortez RD W OPCO Parent LLC	12/1/2023 FC Encore Bradenton LLC / Omega Healthcare Investors Inc
46	Rodriguez	Delia	6414 13th Road South Operations, LLC	6414 13th Rd S Greenacres, FL 33415	13th Road OPCO LLC	13th Road Parent LLC	9/1/2023 Marlin Wood Lake Propco LLC / Welltower Inc
47	Thenor	Rosita	6414 13th Road South Operations, LLC	6414 13th Rd S Greenacres, FL 33415	13th Road OPCO LLC	13th Road Parent LLC	9/1/2023 Marlin Wood Lake Propco LLC / Welltower Inc
48	Aker	Kevin	6700 N.W. 10th Place Operations, LLC	6700 NW 10th Place Gainesville, FL 32605	NW 10th Place OPCO LLC	NW 10th Parent LLC	9/1/2023 6700 NW 10th Place FI Owner LLC
49	Garrett	Donald	6700 N.W. 10th Place Operations, LLC	6700 NW 10th Place Gainesville, FL 32605	NW 10th Place OPCO LLC	NW 10th Parent LLC	9/1/2023 6700 NW 10th Place FI Owner LLC
50	McCray	Gwendolyn	6700 N.W. 10th Place Operations, LLC	6700 NW 10th Place Gainesville, FL 32605	NW 10th Place OPCO LLC	NW 10th Parent LLC	9/1/2023 6700 NW 10th Place FI Owner LLC
51	Wilkie	Barbara	6700 N.W. 10th Place Operations, LLC	6700 NW 10th Place Gainesville, FL 32605	NW 10th Place OPCO LLC	NW 10th Parent LLC	9/1/2023 6700 NW 10th Place FI Owner LLC
52	Whitcomb	Susan	702 South Kings Avenue Operations, LLC	702 S Kings Ave Brandon, FL 33511	702 S Kings OPCO LLC (not in Sunbiz)	702 S Kings OPCO Parent LLC	12/1/2023 Florida Lessor - Five Facilities Inc
53	Sampson	Marguerite	710 North Sun Drive Operations, LLC	710 North Sun Drive Lake Mary, FL 32746	710 N SUN DR OPCO LLC	710 N Sun Dr OPCO Parent LLC	12/1/2023 710 N Sun Dr FI Owner LLC / Welltower Inc
54	Cherba	Nancy	710 North Sun Drive Operations, LLC	710 North Sun Drive Lake Mary, FL 32746	710 N SUN DR OPCO LLC	710 N Sun Dr OPCO Parent LLC	12/1/2023 710 N Sun Dr FI Owner LLC / Welltower Inc
55	Norris	Dorothy	710 North Sun Drive Operations, LLC	710 North Sun Drive Lake Mary, FL 32746	710 N SUN DR OPCO LLC	710 N Sun Dr OPCO Parent LLC	12/1/2023 710 N Sun Dr FI Owner LLC / Welltower Inc
56	Solash-Reed	Linda	710 North Sun Drive Operations, LLC	710 North Sun Drive Lake Mary, FL 32746	710 N SUN DR OPCO LLC	710 N Sun Dr OPCO Parent LLC	12/1/2023 710 N Sun Dr FI Owner LLC / Welltower Inc
57	Howard	Don	710 North Sun Drive Operations, LLC	710 North Sun Drive Lake Mary, FL 32746	710 N SUN DR OPCO LLC	710 N Sun Dr OPCO Parent LLC	12/1/2023 710 N Sun Dr FI Owner LLC / Welltower Inc
58	Cummingham	Jeffrey	741 South Beneva Road Operations, LLC	741 South Beneva Road Sarasota, FL 34232	741 S Beneva RD OPCO LLC	741 S Beneva RD OPCO Parent LLC	12/1/2023 741 S Beneva Rd FI Owner LLC / Welltower Inc
59	Ashley	Mary	777 Ninth Street North Operations, LLC	777 9th St N Naples, FL 34102			FC Encore Naples LLC / Omega Healthcare Investors Inc
60	Higgins	Joan	777 Ninth Street North Operations, LLC	777 9th St N Naples, FL 34102			FC Encore Naples LLC / Omega Healthcare Investors Inc
61	Bershadski	Nelia	777 Ninth Street North Operations, LLC	777 9th St N Naples, FL 34102			FC Encore Naples LLC / Omega Healthcare Investors Inc
62	Davis	Larry	777 Ninth Street North Operations, LLC	777 9th St N Naples, FL 34102			FC Encore Naples LLC / Omega Healthcare Investors Inc
63	Zayas	Edwin	7950 Lake Underhill Road Operations, LLC	7950 Lake Underhill Road Orlando, FL 32822	7950 Lake Underhill Road Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012 Rio Propco LLC
64	O'Berry	Barbara	7950 Lake Underhill Road Operations, LLC	7950 Lake Underhill Road Orlando, FL 32822	7950 Lake Underhill Road Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012 Rio Propco LLC
65	Rojas	Gloria	7950 Lake Underhill Road Operations, LLC	7950 Lake Underhill Road Orlando, FL 32822	7950 Lake Underhill Road Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012 Rio Propco LLC
66	Vega	Rafel	7950 Lake Underhill Road Operations, LLC	7950 Lake Underhill Road Orlando, FL 32822	7950 Lake Underhill Road Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012 Rio Propco LLC
67	Gates	Shirley	9311 South Orange Blossom Trail Operations, LLC	9311 S. Orange Blossom Trl Orlando, FL 32837	Parks Operating LLC	Parks Holdco LLC	4/1/2023 Marlin Parks Propco LLC / Welltower Inc
68	Stover	Machrell	9311 South Orange Blossom Trail Operations, LLC	9311 S. Orange Blossom Trl Orlando, FL 32837	Parks Operating LLC	Parks Holdco LLC	4/1/2023 Marlin Parks Propco LLC / Welltower Inc
69	Williams	Nessa	9311 South Orange Blossom Trail Operations, LLC	9311 S. Orange Blossom Trl Orlando, FL 32837	Parks Operating LLC	Parks Holdco LLC	4/1/2023 Marlin Parks Propco LLC / Welltower Inc
70	McKenzie	Stanley	9311 South Orange Blossom Trail Operations, LLC	9311 S. Orange Blossom Trl Orlando, FL 32837	Parks Operating LLC	Parks Holdco LLC	4/1/2023 Marlin Parks Propco LLC / Welltower Inc

* 12170 Cortez Blvd Operations LLC No Controlling Interest Provided
 **195 Mattie M Kelly 4 different controlling Interest
 *** 777 Ninth Street No Controlling Interest Provided
 ****West Altamonte No Controlling Interest Provided

	Claimant Last Name	Claimant First Name	Debtor Name	Street Address	New Owner/Licensee (Transferee)	Controlling Interest	Operator Date Change	Real Property Owner LLC
71	Ash	Avery	9311 South Orange Blossom Trail Operations, LLC	9311 S. Orange Blossom Trl Orlando, FL 32837	Parks Operating LLC	Parks Holdco LLC	4/1/2023	Marlin Parks Propco LLC / Welltower Inc
72	Scott	Moses	9355 San Jose Boulevard Operations, LLC	9355 San Jose Blvd Jacksonville, FL 32257	San Jose Blvd OPCO LLC	San Jose Parent LLC	9/1/2023	9355 San Jose Boulevard Fl Owner LLC / Welltower Inc
73	Sullivan	Timothy	9355 San Jose Boulevard Operations, LLC	9355 San Jose Blvd Jacksonville, FL 32257	San Jose Blvd OPCO LLC	San Jose Parent LLC	9/1/2023	9355 San Jose Boulevard Fl Owner LLC / Welltower Inc
74	Barrow	Rebecca	Baya Nursing and Rehabilitation, LLC	587 SE Ermine Ave Lake City, FL 32025	Baya Nursing and Rehabilitation, LLC	Consulate MZHBS Leaseholdings LLC	8/1/2013	Baya Realty LLC
75	Meyer	Veron	Baya Nursing and Rehabilitation, LLC	587 SE Ermine Ave Lake City, FL 32025	Baya Nursing and Rehabilitation, LLC	Consulate MZHBS Leaseholdings LLC	8/1/2013	Baya Realty LLC
76	Paul-Bennett	Karen	Baya Nursing and Rehabilitation, LLC	587 SE Ermine Ave Lake City, FL 32025	Baya Nursing and Rehabilitation, LLC	Consulate MZHBS Leaseholdings LLC	8/1/2013	Baya Realty LLC
77	Collins	Gerald	Baya Nursing and Rehabilitation, LLC	587 SE Ermine Ave Lake City, FL 32025	Baya Nursing and Rehabilitation, LLC	Consulate MZHBS Leaseholdings LLC	8/1/2013	Baya Realty LLC
78	Mitchell	Doris	Brandon Facility Operations, LLC	701 Victoria St Brandon, FL 33510	Brandon Heath OPCO LLC	Brandon Member LLC	4/1/2022	Crea Brandon C LLC
79	Padron	Marina	Floridean Facility Operations, LLC	47 NW 32nd PL Miami, FL 33125	Floridian Facility Operations LLC	Consulate NHCG Leaseholdings LLC	2/1/2015	Floridean Realty Group LLC
80	Donald	Charles	Jacksonville Facility Operations, LLC	4101 Southpoint DR E Jacksonville, FL 32216	Southpoint Drive East OPCO LLC	Southpoint Parent LLC	9/1/2023	Marlin Raydiant Jacksonville Propco LLC / Welltower Inc
81	Hall	James	Jacksonville Facility Operations, LLC	4101 Southpoint DR E Jacksonville, FL 32216	Southpoint Drive East OPCO LLC	Southpoint Parent LLC	9/1/2023	Marlin Raydiant Jacksonville Propco LLC / Welltower Inc
82	Graham	Madeline	Jacksonville Facility Operations, LLC	4101 Southpoint DR E Jacksonville, FL 32216	Southpoint Drive East OPCO LLC	Southpoint Parent LLC	9/1/2023	Marlin Raydiant Jacksonville Propco LLC / Welltower Inc
83	Clavijo	Rosenda	Kissimmee Facility Operations, LLC	2511 N John Young PKWY Kissimmee, FL 34741	Kissimmee OPCO LLC	Kissimmee Member LLC	4/1/2022	Crea Kissimmee LLC
84	Owens	Lular	Kissimmee Facility Operations, LLC	2511 N John Young PKWY Kissimmee, FL 34741	Kissimmee OPCO LLC	Kissimmee Member LLC	4/1/2022	Crea Kissimmee LLC
85	Gager	Ehud	Kissimmee Facility Operations, LLC	2511 N John Young PKWY Kissimmee, FL 34741	Kissimmee OPCO LLC	Kissimmee Member LLC	4/1/2022	Crea Kissimmee LLC
86	Hause	Mary	Melbourne Facility Operations, LLC	3033 Sarno Rd Melbourne, FL 32934	Melbourne OPCO LLC	Melbourne Member LLC	4/1/2022	Crea Melbourne LLC
87	Celestin	Sylvia	Miami Facility Operations, LLC	800 NW 95th St Miami, FL 33150	Franco SNF Operations LLC	Franco SNF Operations Holdings LLC	4/1/2022	Crea Franco LLC
88	Brown-Smith	Anna	Miami Facility Operations, LLC	800 NW 95th St Miami, FL 33150	Franco SNF Operations LLC	Franco SNF Operations Holdings LLC	4/1/2022	Crea Franco LLC
89	Rojas	Aldermaro	Miami Facility Operations, LLC	800 NW 95th St Miami, FL 33150	Franco SNF Operations LLC	Franco SNF Operations Holdings LLC	4/1/2022	Crea Franco LLC
90	Walker	Louise	Miami Facility Operations, LLC	800 NW 95th St Miami, FL 33150	Franco SNF Operations LLC	Franco SNF Operations Holdings LLC	4/1/2022	Crea Franco LLC
91	Martinez	Luz	New Port Richey Facility Operations, LLC	8417 Old County Rd 54 New Port Richey, FL 34653	New Port Richey OPCO LLC	New Port Richey Member LLC	4/1/2022	Crea New Port Richey LLC
92	Burdieri	Theresa Mary	North Fort Myers Facility Operations, LLC	991 Pondella RD North Fort Myers FL 33903	Pondella Road OPCO LLC	Pondella Parent LLC	9/1/2023	Marlin Raydiant Fort Myers, Propco LLC / Welltower Inc
93	Thomson	Michael	North Fort Myers Facility Operations, LLC	991 Pondella RD North Fort Myers FL 33903	Pondella Road OPCO LLC	Pondella Parent LLC	9/1/2023	Marlin Raydiant Fort Myers, Propco LLC / Welltower Inc
94	Davis	Larry	North Fort Myers Facility Operations, LLC	991 Pondella RD North Fort Myers FL 33903	Pondella Road OPCO LLC	Pondella Parent LLC	9/1/2023	Marlin Raydiant Fort Myers, Propco LLC / Welltower Inc
95	White	Jessie Mae	Orange Park Facility Operations, LLC	1215 Kingsley Ave Orange Park, FL 32073	1215 Kingsley Ave OPCO LLC	1215 Kingsey Ave OPCO Parent LLC	12/1/2023	
96	Jones	Juanita	Port Charlotte Facility Operations, LLC	18480 Cochran Blvd Port Charlotte, FL 33948	Port Charlotte OPCO LLC	Port Charlotte Member LLC	5/3/2022	18400 Cochran BLVD LLC / Altus Group
97	Murison	David	Port Charlotte Facility Operations, LLC	18480 Cochran Blvd Port Charlotte, FL 33948	Port Charlotte OPCO LLC	Port Charlotte Member LLC	5/3/2022	18400 Cochran BLVD LLC / Altus Group
98	Nielsen	Martin	West Altamonte Facility Operations, LLC	1099 West Town Parkway Altamonte Springs, FL 32714	West Altamonte OPCO LLC		5/3/2022	Crea W Altamonte LLC / Altus Group
99	Rousseau	Daniel	West Altamonte Facility Operations, LLC	1099 West Town Parkway Altamonte Springs, FL 32714	West Altamonte OPCO LLC		5/3/2022	Crea W Altamonte LLC / Altus Group
100	Taylor	Catherine	West Altamonte Facility Operations, LLC	1099 West Town Parkway Altamonte Springs, FL 32714	West Altamonte OPCO LLC		5/3/2022	Crea W Altamonte LLC / Altus Group

* 12170 Cortez Blvd Operations LLC No Controlling Interest Provided
 **195 Mattie M Kelly 4 different controlling Interest
 *** 777 Ninth Street No Controlling Interest Provided
 ****West Altamonte No Controlling Interest Provided

Exhibit “C”

Law Firm	Attorney	Client Last Name	Client First Name	O/S Claim A	Settlement Amount	Defendant	Additional Defendants
Baron & Herskowitz	Jon Herskowitz	Joseph	Maria L.	100000	100000	4200 Washington Street Operations, LLC	CMC II, LLC
Baron & Herskowitz	Jon Herskowitz	Sampson	Marguerite	210000	210000	710 North Sun Drive Operations, LLC	Epsilon Health Care Properties, LLC; Florida Health Care Pr
Baron & Herskowitz	Jon Herskowitz	Burdieri	Theresa Mary	250000	250000	North Fort Myers Facility Operations, LLC	Consulate Facility Leasing, LLC
Bounds Law Group	J. Clancey Bounds	Poarch	Erin	125000	125000	1851 Elkcam Boulevard Operations, LLC	
Bounds Law Group	J. Clancey Bounds	Milsap	Carmen	200000	200000	3001 Palm Coast Parkway Operations, LLC	CMC II, LLC
Coker Law Firm	Steve Watrel	Barrow	Rebecca	250000	250000	Baya Nursing and Rehabilitation, LLC	
Colling Gilbert Wright	Melvin Wright	Mazza	Alfonso	100000	100000	12170 Cortez Boulevard Operations, LLC	Epsilon Health Care Properties, LLC; Tosturi, LLC
Colling Gilbert Wright	Melvin Wright	Guelich	Judy	100000	100000	2333 North Brentwood Circle Operations, LLC	Josera, LLC; Independence Living Centers; Tosturi, LLC; Ep
Colling Gilbert Wright	Melvin Wright	Cherba	Nancy	85000	85000	710 North Sun Drive Operations, LLC	Lavie Care Centers, LLC
Colling Gilbert Wright	Melvin Wright	Norris	Dorothy	125000	125000	710 North Sun Drive Operations, LLC	Lidenskab, LLC
Dellecker, Wilson, King	Kenneth McKenna	Lane	Ingrid K.	100000	100000	1550 Jess Parrish Court Operations, LLC	Epsilon Health Care Properties, LLC; LV CHC Holdings I, L
Dellecker, Wilson, King	Brian Wilson	Solash-Reed	Linda	125000	125000	710 North Sun Drive Operations, LLC	Epsilon Health Care Properties, LLC
Distasio Law Firm	Scott Distasio	Holt	Mary	225000	225000	6305 Cortez Road West Operations, LLC	CMC II, LLC
Dommick Cunningham & Yaffa	Lindsey E. Gale	Ashley	Mary	150000	150000	777 Ninth Street North Operations, LLC	
Dommick Cunningham & Yaffa	Lindsey E. Gale	Celestin	Sylvia	175000	175000	Miami Facility Operations, LLC	
Ford, Dean & Rotundo	William Dean	Perez	Suzanne	75000	75000	1465 Oakfield Drive Operations, LLC	
Ford, Dean & Rotundo	William Dean	Knight	Mae	75000	75000	1615 Miami Road Operations, LLC	
Ford, Dean & Rotundo	William Dean	Foster	Mary	75000	75000	3001 Palm Coast Parkway Operations, LLC	
Ford, Dean & Rotundo	William Dean	Griffin	John	75000	75000	3920 Rosewood Way Operations, LLC	
Ford, Dean & Rotundo	William Dean	Antoine	Philomene	75000	75000	4200 Washington Street Operations, LLC	
Ford, Dean & Rotundo	William Dean	Manuel	Anthony	75000	75000	4200 Washington Street Operations, LLC	
Ford, Dean & Rotundo	William Dean	Mompoin	Juliette	75000	75000	4200 Washington Street Operations, LLC	
Ford, Dean & Rotundo	William Dean	Oegar	Avram	75000	75000	4200 Washington Street Operations, LLC	
Ford, Dean & Rotundo	William Dean	Pina	Mirelle	75000	75000	4200 Washington Street Operations, LLC	
Ford, Dean & Rotundo	William Dean	Tillman	Linda	100000	100000	4200 Washington Street Operations, LLC	
Ford, Dean & Rotundo	William Dean	Vargas	Gerado	75000	75000	4200 Washington Street Operations, LLC	
Ford, Dean & Rotundo	William Dean	Gibson	Benny	75000	75000	4641 Old Canoe Creek Road Operations, LLC	
Ford, Dean & Rotundo	William Dean	Rodriguez	Delia	75000	75000	6414 13th Road South Operations, LLC	
Ford, Dean & Rotundo	William Dean	Thenor	Rosita	75000	75000	6414 13th Road South Operations, LLC	
Ford, Dean & Rotundo	William Dean	Aker	Kevin	75000	75000	6700 N.W. 10th Place Operations, LLC	
Ford, Dean & Rotundo	William Dean	Garrett	Donald	75000	75000	6700 N.W. 10th Place Operations, LLC	
Ford, Dean & Rotundo	William Dean	McCray	Gwendolyn	75000	75000	6700 N.W. 10th Place Operations, LLC	
Ford, Dean & Rotundo	William Dean	Wilkie	Barbara	75000	75000	6700 N.W. 10th Place Operations, LLC	
Ford, Dean & Rotundo	William Dean	Cummingham	Jeffrey	75000	75000	741 South Beneva Road Operations, LLC	
Ford, Dean & Rotundo	William Dean	Higgins	Joan	75000	75000	777 Ninth Street North Operations, LLC	
Ford, Dean & Rotundo	William Dean	Zayas	Edwin	75000	75000	7950 Lake Underhill Road Operations, LLC	
Ford, Dean & Rotundo	William Dean	Gates	Shirley	75000	75000	9311 South Orange Blossom Trail Operations, LLC	
Ford, Dean & Rotundo	William Dean	Stover	Machrell	75000	75000	9311 South Orange Blossom Trail Operations, LLC	
Ford, Dean & Rotundo	William Dean	Meyer	Veron	75000	75000	Baya Nursing and Rehabilitation, LLC	
Ford, Dean & Rotundo	William Dean	Padron	Marina	75000	75000	Floridian Facility Operations, LLC	
Ford, Dean & Rotundo	William Dean	Donald	Charles	75000	75000	Jacksonville Facility Operations, LLC	
Ford, Dean & Rotundo	William Dean	Hall	James	75000	75000	Jacksonville Facility Operations, LLC	
Ford, Dean & Rotundo	William Dean	Brown-Smith	Anna	75000	75000	Miami Facility Operations, LLC	
Ford, Dean & Rotundo	William Dean	Fardales	Sonia	0	0	Miami Facility Operations, LLC	
Ford, Dean & Rotundo	William Dean	Rojas	Aldermaro	75000	75000	Miami Facility Operations, LLC	
Ford, Dean & Rotundo	William Dean	Martinez	Luz	75000	75000	New Port Richey Facility Operations, LLC	
Ford, Dean & Rotundo	William Dean	Jones	Juanita	75000	75000	Port Charlotte Facility Operations, LLC	
Ford, Dean & Rotundo	William Dean	Nielsen	Martin	75000	75000	West Altamonte Facility Operations, LLC	
Ford, Dean & Rotundo	William Dean	Seranksy	Roy	0	0		
Fulgencio Law	Chris Mathena	Lizardi	Miriam	75000	75000	1120 West Donegan Avenue Operations, LLC	
Fulgencio Law	Chris Mathena	Ash	Avery	200000	200000	9311 South Orange Blossom Trail Operations, LLC	
Fulgencio Law	Chris Mathena	Collins	Gerald	35000	35000	Baya Nursing and Rehabilitation, LLC	
Hughes Law Firm, P.A.	Cameron Barnard	O'Berry	Barbara	175000	175000	7950 Lake Underhill Road Operations, LLC	

Law Firm	Attorney	Client Last Name	Client First Name	O/S Claim A	Settlement Amount	Defendant	Additional Defendants
Hughes Law Firm, P.A.	Cameron Barnard	Graham	Madeline	150000	150000	Jacksonville Facility Operations, LLC	
Hughes Law Firm, P.A.	Cameron Barnard	Clavijo	Rosenda	150000	150000	Kissimmee Facility Operations, LLC	
Mallard Perez	Sara Mallard	Thomson	Michael	206000	206000	North Fort Myers Facility Operations, LLC	
Morgan & Morgan	Spencer Payne	Rousseau	Daniel	145000	145000	West Altamonte Facility Operations, LLC	CMC II, LLC
Paul & Perkins	Jason Paul	Rigas	Gail	16000	160000	1120 West Donegan Avenue Operations, LLC	Lavie Care Centers, LLC and Epsilon Health Care Properties
Paul & Perkins	Jason Paul	McHenry	Vickie	35000	35000	11565 Harts Road Operations, LLC	
Paul & Perkins	Jason Paul	Kolbe	Richard	37500	100000	1851 Elkcam Boulevard Operations, LLC	Epsilon Health Care Properties, LLC; Lavie Care Centers, LLC
Paul & Perkins	Jason Paul	Knicley	Peggy	14000	140000	195 Mattie M. Kelly Boulevard Operations, LLC	Epsilon Health Care Properties, LLC
Paul & Perkins	Jason Paul	Abel	Bebee	32875	125000	5405 Babcock Street Operations, LLC	Epsilon Health Care Properties, LLC; CMC II, LLC; Lavie C
Paul & Perkins	Jason Paul	Howard	Don	25000	175000	710 North Sun Drive Operations, LLC	
Paul & Perkins	Jason Paul	Rojas	Gloria	12500	125000	7950 Lake Underhill Road Operations, LLC	
Paul & Perkins	Jason Paul	Abramson		0	0		
Paul & Perkins	Jason Paul	Jackson		0	0		
Paul & Perkins	Jason Paul	Jean Noel		0	0		
Paul & Perkins	Jason Paul	King		0	0		
Paul & Perkins	Jason Paul	Stern		0	0		
Paul & Perkins	Jason Paul	Williams	Nessa	60000	150000	9311 South Orange Blossom Trail Operations, LLC	
Paul & Perkins	Jason Paul	Owens	Lular	37500	100000	Kissimmee Facility Operations, LLC	Laive Care Centers, LLC
Paul & Perkins	Jason Paul	Taylor		125000	125000	West Altamonte Facility Operations, LLC	
Senior Justice Law Firm	Michael Brevda	Powell	Tereather	75000	75000	3101 Ginger Drive Operations, LLC	Tallahassee Facility Operations, LLC; Josera, LLC; Tosturi,
Senior Justice Law Firm	Michael Brevda	Miller	Eileen	0	0	9400 SW 137th Avenue Operations LLC	NSPRMC, LLC
Terry S. Nelson PA	Terry S. Nelson	Ortiz	Crispin	65000	65000	216 Santa Barbara Boulevard Operations, LLC	
Terry S. Nelson PA	Terry S. Nelson	Barry	John	50000	50000	2826 Cleveland Avenue Operations, LLC	
Terry S. Nelson PA	Terry S. Nelson	Skow-Barr	Delano	90000	90000	2826 Cleveland Avenue Operations, LLC	
Terry S. Nelson PA	Terry S. Nelson	Woodard	Chester	30000	50000	2826 Cleveland Avenue Operations, LLC	
Terry S. Nelson PA	Terry S. Nelson	Malcomb	Buddy	100000	100000	3735 Evans Avenue Operations, LLC	
Terry S. Nelson PA	Terry S. Nelson	McGhee	David	65000	65000	3735 Evans Avenue Operations, LLC	
Terry S. Nelson PA	Terry S. Nelson	Rucker-Fluellen	Mildred	50000	50000	3735 Evans Avenue Operations, LLC	
Terry S. Nelson PA	Terry S. Nelson	Bershadski	Nelia	85000	85000	777 Ninth Street North Operations, LLC	
Terry S. Nelson PA	Terry S. Nelson	Davis	Larry	85000	85000	777 Ninth Street North Operations, LLC	
Terry S. Nelson PA	Terry S. Nelson	Davis	Larry	65000	65000	North Fort Myers Facility Operations, LLC	
Terry S. Nelson PA	Terry S. Nelson	Murison	David	75000	75000	Port Charlotte Facility Operations, LLC	
The Lawrence Law Group, P.A.	Greg Lawrence	Sullivan	Timothy	260000	320000	9355 San Jose Boulevard Operations, LLC	
Your Insurance Attorney	Nathaniel Carter	Cobb	Doneatha	81666.76	140000	1010 Carpenters Way Operations, LLC	
Your Insurance Attorney	Nathaniel Carter	Acevedo	Sharon	81666.76	140000	1120 West Donegan Avenue Operations, LLC	
Your Insurance Attorney	Nathaniel Carter	Mackey	George	81666.76	140000	1120 West Donegan Avenue Operations, LLC	
Your Insurance Attorney	Nathaniel Carter	McKinnion-Murphy	Netti	81666.76	140000	1120 West Donegan Avenue Operations, LLC	
Your Insurance Attorney	Nathaniel Carter	Barrett	Harry Wayne	81666.76	140000	11565 Harts Road Operations, LLC	
Your Insurance Attorney	Nathaniel Carter	Foster	Levi	81666.76	140000	15204 West Colonial Drive Operations, LLC	
Your Insurance Attorney	Nathaniel Carter	Walker	Lula Mae	81666.76	140000	1615 Miami Road Operations, LLC	
Your Insurance Attorney	Nathaniel Carter	Blair	Bobby	81666.76	140000	3001 Palm Coast Parkway Operations, LLC	
Your Insurance Attorney	Nathaniel Carter	Moran	Doris	81666.76	140000	3735 Evans Avenue Operations, LLC	
Your Insurance Attorney	Nathaniel Carter	Diaz	Jose R.	100000	100000	518 West Fletcher Avenue Operations, LLC	Epsilon Health Care Properties, LLC; Lidenskab LLC;
Your Insurance Attorney	Nathaniel Carter	Hill	Roosevelt	81666.76	140000	518 West Fletcher Avenue Operations, LLC	
Your Insurance Attorney	Nathaniel Carter	Druelle	Catherine	81666.76	140000	6305 Cortez Road West Operations, LLC	
Your Insurance Attorney	Nathaniel Carter	Whitcomb	Susan	81666.76	140000	702 South Kings Avenue Operations, LLC	
Your Insurance Attorney	Nathaniel Carter	Vega	Rafel	81666.76	140000	7950 Lake Underhill Road Operations, LLC	
Your Insurance Attorney	Nathaniel Carter	McKenzie	Stanley	81666.76	140000	9311 South Orange Blossom Trail Operations, LLC	
Your Insurance Attorney	Nathaniel Carter	Scott	Moses	81666.76	140000	9355 San Jose Boulevard Operations, LLC	
Your Insurance Attorney	Nathaniel Carter	Paul-Bennett	Karen	81666.76	140000	Baya Nursing and Rehabilitation, LLC	
Your Insurance Attorney	Nathaniel Carter	Mitchell	Doris	81666.76	140000	Brandon Facility Operations, LLC	
Your Insurance Attorney	Nathaniel Carter	Gager	Ehud	81666.76	140000	Kissimmee Facility Operations, LLC	
Your Insurance Attorney	Nathaniel Carter	Hause	Mary	81666.76	140000	Melbourne Facility Operations, LLC	

Law Firm	Attorney	Client Last Name	Client First Name	O/S Claim A	Settlement Amount	Defendant	Additional Defendants
Your Insurance Attorney	Nathaniel Carter	Walker	Louise	81666.76	140000	Miami Facility Operations, LLC	
Your Insurance Attorney	Nathaniel Carter	White	Jessie Mae	81666.76	140000	Orange Park Facility Operations, LLC	
				9186376.96	11331000		

Exhibit “D”

CLAIMANT FIRMS			
	Law Firm	Attorney	Law Firm Address
1	Baron & Herskowitz	Jon Herskowitz	9100 S Dadeland Blvd., Suite 1704, Miami, Florida 33156
2	Bounds Law Group	J. Brent Smith	1751 N. Park Avenue, Maitland, Florida 32751
3	Coker Law Firm	Steve Watrel	136 East Bay Street, Jacksonville, Florida 32202
4	Colling Gilbert Wright	Melvin B. Wright	801 N. Orange Avenue, Suite 830, Orlando, Florida 32801
5	Dellecker, Wilson, King	Kenneth J. McKenna	719 Vassar Street, Orlando, Florida 32804
6	Distasio Law Firm	Scott P. Distasio	1112 Channelside Drive, # 5, Tampa, Florida 33602
7	Dommick Cunningham & Yaffa	Lindsey E. Gale	2401 PGA Blvd., Suite 140, Palm Beach Gardens, Florida 33410
8	Ford, Dean & Rotundo	William Dean	3323 NE 163rd Street, Suite 605, N. Miami Beach, Florida 33160
9	Fulgencio Law	Chris Mathena	105 S Edison Ave, Tampa, FL 33606
10	Hughes Law Firm, P.A.	Cameron B.S. Barnard	500 Maplewood Drive, Suite 5, Jupiter, Florida 33458
11	Mallard Perez	Sara B. Mallard	889 N. Washington Blvd., Sarasota, Florida 34236
12	Morgan & Morgan	Spencer Payne	20 N. Orange Ave., Suite 1600, Orlando, Florida 32801
13	Paul & Perkins	Jason A. Paul	711 N Orlando Avenue, Suite 202, Maitland, Florida 32751
14	Senior Justice Law Firm	Michael Brevda	7700 Congress Avenue, Suite 3216, Boca Raton, Florida 33487
15	Terry S. Nelson PA	Terry S. Nelson	2401 First Street, Suite 102, Fort Myers, Florida 33901
16	The Lawrence Law Group, P.A.	Greg Lawrence	610 Boating Club Road, St. Augustine, Florida 32084
17	Your Insurance Attorney	Nathaniel P. Carter	2300 Maitland Ctr Pkwy, Suite 122, Maitland, Florida 32751

Exhibit “G”

Healthcare Negligence Settlement Recovery Corp.
 314 Lakeland Drive
 Lakeland, FL 34001
 July 25, 2024

	Claimant Last Name	Claimant First Name	Debtor Name	Street Address	New Owner/Licensee (Transferee)	Controlling Interest	Operator Date Change	Real Property Owner LLC
1	Cobb	Doneatha	1010 Carpenters Way Operations, LLC	1010 Carpenters Way Lakeland, FL 33809	Wedgewood Operating LLC	Wedgewood Holdco LLC	9/5/2023	1010 Carpenters Way Fl Owner LLC / Welltower Inc
2	Rigas	Gail	1120 West Donegan Avenue Operations, LLC	1120 W, Donegan Ave Kissimmee, FL 34741	West Donegan AVE SNF OPCO LLC	West Donegan SNF Parent LLC	9/1/2023	1120 West Donegan Avenue Fl Owner LLC / Welltower Inc
3	Acededo	Sharon	1120 West Donegan Avenue Operations, LLC	1120 W, Donegan Ave Kissimmee, FL 34741	West Donegan AVE SNF OPCO LLC	West Donegan SNF Parent LLC	9/1/2023	1120 West Donegan Avenue Fl Owner LLC / Welltower Inc
4	Mackey	George	1120 West Donegan Avenue Operations, LLC	1120 W, Donegan Ave Kissimmee, FL 34741	West Donegan AVE SNF OPCO LLC	West Donegan SNF Parent LLC	9/1/2023	1120 West Donegan Avenue Fl Owner LLC / Welltower Inc
5	McKinnion-Murphy	Netti	1120 West Donegan Avenue Operations, LLC	1120 W, Donegan Ave Kissimmee, FL 34741	West Donegan AVE SNF OPCO LLC	West Donegan SNF Parent LLC	9/1/2023	1120 West Donegan Avenue Fl Owner LLC / Welltower Inc
6	Lizardi	Miriam	1120 West Donegan Avenue Operations, LLC	1120 W, Donegan Ave Kissimmee, FL 34741	West Donegan AVE SNF OPCO LLC	West Donegan SNF Parent LLC	9/1/2023	1120 West Donegan Avenue Fl Owner LLC / Welltower Inc
7	McHenry	Vickie	11565 Harts Road Operations, LLC	11565 Harts Rd Jacksonville, FL 32218	11565 Harts Road Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012	Beverly Investment Properties
8	Barrett	Harry Wayne	11565 Harts Road Operations, LLC	11565 Harts Rd Jacksonville, FL 32218	11565 Harts Road Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012	Beverly Investment Properties
9	Mazza	Alfonso	12170 Cortez Boulevard Operations, LLC	12170 Cortez Blvd Brooksville, FL 34613	12170 Cortez Blvd Opco LLC		12/1/2023	FC Encore Brooksville II, LLC / Omega Healthcare Investors Inc
10	Perez	Suzanne	1465 Oakfield Drive Operations, LLC	1465 Oakfield Dr Brandon, FL 33511	1465 Oakfield Dr OPCO LLC	1465 Oakfield Dr OPCO Parent LLC	12/1/2023	FC Encore Brandon LLC / Omega Healthcare Investors Inc
11	Foster	Levi	15204 West Colonial Drive Operations, LLC	15204 W Colonial Dr Winter Garden, FL 34787	West Colonial Drive OPCO LLC	West Colonial Parent LLC	9/1/2023	15204 W Colonial Drive Fl Owner LLC / Welltower Inc
12	Lane	Ingrid K.	1550 Jess Parrish Court Operations, LLC	1550 Jess Parrish Ct Titusville, FL 32796	Vista Manor Operating LLC	Vista Manor Holdco LLC	9/5/2023	1550 Jess Parrish Court Fl Owner LLC
13	Knight	Mae	1615 Miami Road Operations, LLC	1615 Miami Rd Ft Lauderdale, FL 33316	Miami Road OPCO LLC	Miami Road Parent LLC	9/1/2023	1615 Miami Road Fl Owner LLC
14	Walker	Lula Mae	1615 Miami Road Operations, LLC	1615 Miami Rd Ft Lauderdale, FL 33316	Miami Road OPCO LLC	Miami Road Parent LLC	9/1/2023	1615 Miami Road Fl Owner LLC
15	Poarch	Erin	1851 Elkcam Boulevard Operations, LLC	1851 Elkcam Blvd Deltona, FL 32725	Deltona Operating LLC	Deltona Holdco LLC	9/5/2023	FC Encore Deltona LLC / Omega Healthcare Investors Inc
16	Kolbe	Richard	1851 Elkcam Boulevard Operations, LLC	1851 Elkcam Blvd Deltona, FL 32725	Deltona Operating LLC	Deltona Holdco LLC	9/5/2023	FC Encore Deltona LLC / Omega Healthcare Investors Inc
17	Knicley	Peggy	195 Mattie M. Kelly Boulevard Operations, LLC	195 Mattie M Kelly Blvd Destin, FL 32541	Destin Senior Care, LLC	Various	4/17/2023	FC Encor Destin LLC/ Omega Healthcare Investors Inc
18	Ortiz	Crispin	216 Santa Barbara Boulevard Operations, LLC	216 Santa Barbara Blvd Cape Coral, FL 33991	Santa Barbara Blvd OPCO LLC	Santa Barbara Parent LLC	11/2/2023	FC Encore Cape Coral LLC/ Omega Healthcare Investors Inc
19	Guelich	Judy	2333 North Brentwood Circle Operations, LLC	2333 N. Brentwood Cir Lecanto FL 34461	North Brentwood Circle OPCO LLC	Brentwood Parent LLC	11/2/2023	FC Encore Lecanto LLC / Omega Healthcare Investors Inc
20	Barry	John	2826 Cleveland Avenue Operations, LLC	2826 Cleveland Ave, Fort Myers, FL 33901	2826 Cleveland Avenue Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012	Decathlon Tyst LLC
21	Skow-Barr	Delano	2826 Cleveland Avenue Operations, LLC	2826 Cleveland Ave, Fort Myers, FL 33901	2826 Cleveland Avenue Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012	Decathlon Tyst LLC
22	Woodard	Chester	2826 Cleveland Avenue Operations, LLC	2826 Cleveland Ave, Fort Myers, FL 33901	2826 Cleveland Avenue Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012	Decathlon Tyst LLC
23	Milsap	Carmen	3001 Palm Coast Parkway Operations, LLC	3001 Palm Coast Parkway SE Palm Coast, FL 32137	Palm Coast PKWY OPCO LLC	Palm Coast Parent LLC	11/2/2023	FC Encore Palm Coast LLC / Omega Healthcare Investors Inc
24	Foster	Mary	3001 Palm Coast Parkway Operations, LLC	3001 Palm Coast Parkway SE Palm Coast, FL 32137	Palm Coast PKWY OPCO LLC	Palm Coast Parent LLC	11/2/2023	FC Encore Palm Coast LLC / Omega Healthcare Investors Inc
25	Blair	Bobby	3001 Palm Coast Parkway Operations, LLC	3001 Palm Coast Parkway SE Palm Coast, FL 32137	Palm Coast PKWY OPCO LLC	Palm Coast Parent LLC	11/2/2023	FC Encore Palm Coast LLC / Omega Healthcare Investors Inc
26	Powell	Tereather	3101 Ginger Drive Operations, LLC	3101 Ginger Dr Tallahassee, FL 32308	Ginger Drive OPCO LLC	Ginger Parent LLC	11/2/2023	FC Encore Core Tallahassee I LLC / Omega Healthcare Investors Inc
27	Malcomb	Buddy	3735 Evans Avenue Operations, LLC	3735 Evans Ave Fort Myers, FL 33901	Evans Avenue OPCO LLC	Evans Parent LLC	11/2/2023	FC Encore Fort Myers LLC / Omega Healthcare Investors Inc
28	McGhee	David	3735 Evans Avenue Operations, LLC	3735 Evans Ave Fort Myers, FL 33901	Evans Avenue OPCO LLC	Evans Parent LLC	11/2/2023	FC Encore Fort Myers LLC / Omega Healthcare Investors Inc
29	Rucker-Fluellen	Mildred	3735 Evans Avenue Operations, LLC	3735 Evans Ave Fort Myers, FL 33901	Evans Avenue OPCO LLC	Evans Parent LLC	11/2/2023	FC Encore Fort Myers LLC / Omega Healthcare Investors Inc
30	Moran	Doris	3735 Evans Avenue Operations, LLC	3735 Evans Ave Fort Myers, FL 33901	Evans Avenue OPCO LLC	Evans Parent LLC	11/2/2023	FC Encore Fort Myers LLC / Omega Healthcare Investors Inc
31	Griffin	John	3920 Rosewood Way Operations, LLC	3920 Rosewood Way Orlando, FL 32808	3920 Rosewood Way OPCO LLC	3920 Rosewood Way OPCO Parent LLC	12/1/2023	3920 Rosewood Way Fl Owner LLC / Welltower Inc
32	Joseph	Maria L.	4200 Washington Street Operations, LLC	4200 Washington St Hollywood, FL 33021	Hillcrest OPCO LLC	Hillcrest OPCO Holdings LLC	9/29/2023	Hillcrest Propco LLC
33	Antoine	Philomene	4200 Washington Street Operations, LLC	4200 Washington St Hollywood, FL 33021	Hillcrest OPCO LLC	Hillcrest OPCO Holdings LLC	9/29/2023	Hillcrest Propco LLC
34	Manuel	Anthony	4200 Washington Street Operations, LLC	4200 Washington St Hollywood, FL 33021	Hillcrest OPCO LLC	Hillcrest OPCO Holdings LLC	9/29/2023	Hillcrest Propco LLC
35	Mompoin	Juliette	4200 Washington Street Operations, LLC	4200 Washington St Hollywood, FL 33021	Hillcrest OPCO LLC	Hillcrest OPCO Holdings LLC	9/29/2023	Hillcrest Propco LLC

* 12170 Cortez Blvd Operations LLC No Controlling Interest Provided

**195 Mattie M Kelly 4 different controlling Interest

*** 777 Ninth Street No Controlling Interest Provided

****West Altamonte No Controlling Interest Provided

Healthcare Negligence Settlement Recovery Corp.
 Plaintiff Debtors
 July 25, 2024

Claimant Last Name	Claimant First Name	Debtor Name	Street Address	New Owner/Licensee (Transferee)	Controlling Interest	Operator Date Change	Real Property Owner LLC
36	Oegar	Avram	4200 Washington Street Operations, LLC	4200 Washington St Hollywood, FL 33021	Hillcrest OPCO LLC	Hillcrest OPCO Holdings LLC	9/29/2023 Hillcrest Propco LLC
37	Pina	Mirelle	4200 Washington Street Operations, LLC	4200 Washington St Hollywood, FL 33021	Hillcrest OPCO LLC	Hillcrest OPCO Holdings LLC	9/29/2023 Hillcrest Propco LLC
38	Tillman	Linda	4200 Washington Street Operations, LLC	4200 Washington St Hollywood, FL 33021	Hillcrest OPCO LLC	Hillcrest OPCO Holdings LLC	9/29/2023 Hillcrest Propco LLC
39	Vargas	Gerado	4200 Washington Street Operations, LLC	4200 Washington St Hollywood, FL 33021	Hillcrest OPCO LLC	Hillcrest OPCO Holdings LLC	9/29/2023 Hillcrest Propco LLC
40	Gibson	Benny	4641 Old Canoe Creek Road Operations, LLC	4641 Old Canoe Creek Road Sanit Cloud, FL 34769	541 Old Canoe Creek Rd OPCO LLC	541 Old Canoe Creek Rd OPCO Parent LLC	12/1/2023 541 Old Canoe Creek Rd FI Owner LLC / Welltower Inc
41	Diaz	Jose R.	518 West Fletcher Avenue Operations, LLC	518 W Fletcher Ave Tampa, FL 33612	West Fletcher Ave OPCO LLC	West Fletcher Parent LLC	9/1/2023 518 West Fletcher Avenue FL Owner LLC / Welltower Inc
42	Hill	Roosevelt	518 West Fletcher Avenue Operations, LLC	518 W Fletcher Ave Tampa, FL 33612	West Fletcher Ave OPCO LLC	West Fletcher Parent LLC	9/1/2023 518 West Fletcher Avenue FL Owner LLC / Welltower Inc
43	Abel	Bebee	5405 Babcock Street Operations, LLC	5405 Babcock St NE Palm Bay, FL 32905	5405 Babcock St NE OPCO LLC	5405 Babcock St NE OPCO Parent LLC	12/1/2023 5405 Babcock St NE FI Owner LLC / Welltower Inc
44	Holt	Mary	6305 Cortez Road West Operations, LLC	6305 Cortez Rd W Bradenton, FL 34210	6305 Cortez RD W OPCO LLC	6305 Cortez RD W OPCO Parent LLC	12/1/2023 FC Encore Bradenton LLC / Omega Healthcare Investors Inc
45	Druelle	Catherine	6305 Cortez Road West Operations, LLC	6305 Cortez Rd W Bradenton, FL 34210	6305 Cortez RD W OPCO LLC	6305 Cortez RD W OPCO Parent LLC	12/1/2023 FC Encore Bradenton LLC / Omega Healthcare Investors Inc
46	Rodriguez	Delia	6414 13th Road South Operations, LLC	6414 13th Rd S Greenacres, FL 33415	13th Road OPCO LLC	13th Road Parent LLC	9/1/2023 Marlin Wood Lake Propco LLC / Welltower Inc
47	Thenor	Rosita	6414 13th Road South Operations, LLC	6414 13th Rd S Greenacres, FL 33415	13th Road OPCO LLC	13th Road Parent LLC	9/1/2023 Marlin Wood Lake Propco LLC / Welltower Inc
48	Aker	Kevin	6700 N.W. 10th Place Operations, LLC	6700 NW 10th Place Gainesville, FL 32605	NW 10th Place OPCO LLC	NW 10th Parent LLC	9/1/2023 6700 NW 10th Place FI Owner LLC
49	Garrett	Donald	6700 N.W. 10th Place Operations, LLC	6700 NW 10th Place Gainesville, FL 32605	NW 10th Place OPCO LLC	NW 10th Parent LLC	9/1/2023 6700 NW 10th Place FI Owner LLC
50	McCray	Gwendolyn	6700 N.W. 10th Place Operations, LLC	6700 NW 10th Place Gainesville, FL 32605	NW 10th Place OPCO LLC	NW 10th Parent LLC	9/1/2023 6700 NW 10th Place FI Owner LLC
51	Wilkie	Barbara	6700 N.W. 10th Place Operations, LLC	6700 NW 10th Place Gainesville, FL 32605	NW 10th Place OPCO LLC	NW 10th Parent LLC	9/1/2023 6700 NW 10th Place FI Owner LLC
52	Whitcomb	Susan	702 South Kings Avenue Operations, LLC	702 S Kings Ave Brandon, FL 33511	702 S Kings OPCO LLC (not in Sunbiz)	702 S Kings OPCO Parent LLC	12/1/2023 Florida Lessor - Five Facilities Inc
53	Sampson	Marguerite	710 North Sun Drive Operations, LLC	710 North Sun Drive Lake Mary, FL 32746	710 N SUN DR OPCO LLC	710 N Sun Dr OPCO Parent LLC	12/1/2023 710 N Sun Dr FI Owner LLC / Welltower Inc
54	Cherba	Nancy	710 North Sun Drive Operations, LLC	710 North Sun Drive Lake Mary, FL 32746	710 N SUN DR OPCO LLC	710 N Sun Dr OPCO Parent LLC	12/1/2023 710 N Sun Dr FI Owner LLC / Welltower Inc
55	Norris	Dorothy	710 North Sun Drive Operations, LLC	710 North Sun Drive Lake Mary, FL 32746	710 N SUN DR OPCO LLC	710 N Sun Dr OPCO Parent LLC	12/1/2023 710 N Sun Dr FI Owner LLC / Welltower Inc
56	Solash-Reed	Linda	710 North Sun Drive Operations, LLC	710 North Sun Drive Lake Mary, FL 32746	710 N SUN DR OPCO LLC	710 N Sun Dr OPCO Parent LLC	12/1/2023 710 N Sun Dr FI Owner LLC / Welltower Inc
57	Howard	Don	710 North Sun Drive Operations, LLC	710 North Sun Drive Lake Mary, FL 32746	710 N SUN DR OPCO LLC	710 N Sun Dr OPCO Parent LLC	12/1/2023 710 N Sun Dr FI Owner LLC / Welltower Inc
58	Cummingham	Jeffrey	741 South Beneva Road Operations, LLC	741 South Beneva Road Sarasota, FL 34232	741 S Beneva RD OPCO LLC	741 S Beneva RD OPCO Parent LLC	12/1/2023 741 S Beneva Rd FI Owner LLC / Welltower Inc
59	Ashley	Mary	777 Ninth Street North Operations, LLC	777 9th St N Naples, FL 34102			FC Encore Naples LLC / Omega Healthcare Investors Inc
60	Higgins	Joan	777 Ninth Street North Operations, LLC	777 9th St N Naples, FL 34102			FC Encore Naples LLC / Omega Healthcare Investors Inc
61	Bershadski	Nelia	777 Ninth Street North Operations, LLC	777 9th St N Naples, FL 34102			FC Encore Naples LLC / Omega Healthcare Investors Inc
62	Davis	Larry	777 Ninth Street North Operations, LLC	777 9th St N Naples, FL 34102			FC Encore Naples LLC / Omega Healthcare Investors Inc
63	Zayas	Edwin	7950 Lake Underhill Road Operations, LLC	7950 Lake Underhill Road Orlando, FL 32822	7950 Lake Underhill Road Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012 Rio Propco LLC
64	O'Berry	Barbara	7950 Lake Underhill Road Operations, LLC	7950 Lake Underhill Road Orlando, FL 32822	7950 Lake Underhill Road Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012 Rio Propco LLC
65	Rojas	Gloria	7950 Lake Underhill Road Operations, LLC	7950 Lake Underhill Road Orlando, FL 32822	7950 Lake Underhill Road Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012 Rio Propco LLC
66	Vega	Rafel	7950 Lake Underhill Road Operations, LLC	7950 Lake Underhill Road Orlando, FL 32822	7950 Lake Underhill Road Operations, LLC	Epsilon Healthcare Properties LLC	2/1/2012 Rio Propco LLC
67	Gates	Shirley	9311 South Orange Blossom Trail Operations, LLC	9311 S. Orange Blossom Trl Orlando, FL 32837	Parks Operating LLC	Parks Holdco LLC	4/1/2023 Marlin Parks Propco LLC / Welltower Inc
68	Stover	Machrell	9311 South Orange Blossom Trail Operations, LLC	9311 S. Orange Blossom Trl Orlando, FL 32837	Parks Operating LLC	Parks Holdco LLC	4/1/2023 Marlin Parks Propco LLC / Welltower Inc
69	Williams	Nessa	9311 South Orange Blossom Trail Operations, LLC	9311 S. Orange Blossom Trl Orlando, FL 32837	Parks Operating LLC	Parks Holdco LLC	4/1/2023 Marlin Parks Propco LLC / Welltower Inc
70	McKenzie	Stanley	9311 South Orange Blossom Trail Operations, LLC	9311 S. Orange Blossom Trl Orlando, FL 32837	Parks Operating LLC	Parks Holdco LLC	4/1/2023 Marlin Parks Propco LLC / Welltower Inc

* 12170 Cortez Blvd Operations LLC No Controlling Interest Provided
 **195 Mattie M Kelly 4 different controlling Interest
 *** 777 Ninth Street No Controlling Interest Provided
 ****West Altamonte No Controlling Interest Provided

Healthcare Negligence Settlement Recovery Corp.
 3100 Lake Park Dr
 Atlanta, GA 30328
 July 25, 2024

	Claimant Last Name	Claimant First Name	Debtor Name	Street Address	New Owner/Licensee (Transferee)	Controlling Interest	Operator Date Change	Real Property Owner LLC
71	Ash	Avery	9311 South Orange Blossom Trail Operations, LLC	9311 S. Orange Blossom Trl Orlando, FL 32837	Parks Operating LLC	Parks Holdco LLC	4/1/2023	Marlin Parks Propco LLC / Welltower Inc
72	Scott	Moses	9355 San Jose Boulevard Operations, LLC	9355 San Jose Blvd Jacksonville, FL 32257	San Jose Blvd OPCO LLC	San Jose Parent LLC	9/1/2023	9355 San Jose Boulevard Fl Owner LLC / Welltower Inc
73	Sullivan	Timothy	9355 San Jose Boulevard Operations, LLC	9355 San Jose Blvd Jacksonville, FL 32257	San Jose Blvd OPCO LLC	San Jose Parent LLC	9/1/2023	9355 San Jose Boulevard Fl Owner LLC / Welltower Inc
74	Barrow	Rebecca	Baya Nursing and Rehabilitation, LLC	587 SE Ermine Ave Lake City, FL 32025	Baya Nursing and Rehabilitation, LLC	Consulate MZHBS Leaseholdings LLC	8/1/2013	Baya Realty LLC
75	Meyer	Veron	Baya Nursing and Rehabilitation, LLC	587 SE Ermine Ave Lake City, FL 32025	Baya Nursing and Rehabilitation, LLC	Consulate MZHBS Leaseholdings LLC	8/1/2013	Baya Realty LLC
76	Paul-Bennett	Karen	Baya Nursing and Rehabilitation, LLC	587 SE Ermine Ave Lake City, FL 32025	Baya Nursing and Rehabilitation, LLC	Consulate MZHBS Leaseholdings LLC	8/1/2013	Baya Realty LLC
77	Collins	Gerald	Baya Nursing and Rehabilitation, LLC	587 SE Ermine Ave Lake City, FL 32025	Baya Nursing and Rehabilitation, LLC	Consulate MZHBS Leaseholdings LLC	8/1/2013	Baya Realty LLC
78	Mitchell	Doris	Brandon Facility Operations, LLC	701 Victoria St Brandon, FL 33510	Brandon Heath OPCO LLC	Brandon Member LLC	4/1/2022	Crea Brandon C LLC
79	Padron	Marina	Floridean Facility Operations, LLC	47 NW 32nd PL Miami, FL 33125	Floridian Facility Operations LLC	Consulate NHCG Leaseholdings LLC	2/1/2015	Floridean Realty Group LLC
80	Donald	Charles	Jacksonville Facility Operations, LLC	4101 Southpoint DR E Jacksonville, FL 32216	Southpoint Drive East OPCO LLC	Southpoint Parent LLC	9/1/2023	Marlin Raydiant Jacksonville Propco LLC / Welltower Inc
81	Hall	James	Jacksonville Facility Operations, LLC	4101 Southpoint DR E Jacksonville, FL 32216	Southpoint Drive East OPCO LLC	Southpoint Parent LLC	9/1/2023	Marlin Raydiant Jacksonville Propco LLC / Welltower Inc
82	Graham	Madeline	Jacksonville Facility Operations, LLC	4101 Southpoint DR E Jacksonville, FL 32216	Southpoint Drive East OPCO LLC	Southpoint Parent LLC	9/1/2023	Marlin Raydiant Jacksonville Propco LLC / Welltower Inc
83	Clavijo	Rosenda	Kissimmee Facility Operations, LLC	2511 N John Young PKWY Kissimmee, FL 34741	Kissimmee OPCO LLC	Kissimmee Member LLC	4/1/2022	Crea Kissimmee LLC
84	Owens	Lular	Kissimmee Facility Operations, LLC	2511 N John Young PKWY Kissimmee, FL 34741	Kissimmee OPCO LLC	Kissimmee Member LLC	4/1/2022	Crea Kissimmee LLC
85	Gager	Ehud	Kissimmee Facility Operations, LLC	2511 N John Young PKWY Kissimmee, FL 34741	Kissimmee OPCO LLC	Kissimmee Member LLC	4/1/2022	Crea Kissimmee LLC
86	Hause	Mary	Melbourne Facility Operations, LLC	3033 Sarno Rd Melbourne, FL 32934	Melbourne OPCO LLC	Melbourne Member LLC	4/1/2022	Crea Melbourne LLC
87	Celestin	Sylvia	Miami Facility Operations, LLC	800 NW 95th St Miami, FL 33150	Franco SNF Operations LLC	Franco SNF Operations Holdings LLC	4/1/2022	Crea Franco LLC
88	Brown-Smith	Anna	Miami Facility Operations, LLC	800 NW 95th St Miami, FL 33150	Franco SNF Operations LLC	Franco SNF Operations Holdings LLC	4/1/2022	Crea Franco LLC
89	Rojas	Aldermaro	Miami Facility Operations, LLC	800 NW 95th St Miami, FL 33150	Franco SNF Operations LLC	Franco SNF Operations Holdings LLC	4/1/2022	Crea Franco LLC
90	Walker	Louise	Miami Facility Operations, LLC	800 NW 95th St Miami, FL 33150	Franco SNF Operations LLC	Franco SNF Operations Holdings LLC	4/1/2022	Crea Franco LLC
91	Martinez	Luz	New Port Richey Facility Operations, LLC	8417 Old County Rd 54 New Port Richey, FL 34653	New Port Richey OPCO LLC	New Port Richey Member LLC	4/1/2022	Crea New Port Richey LLC
92	Burdieri	Theresa Mary	North Fort Myers Facility Operations, LLC	991 Pondella RD North Fort Myers FL 33903	Pondella Road OPCO LLC	Pondella Parent LLC	9/1/2023	Marlin Raydiant Fort Myers, Propco LLC / Welltower Inc
93	Thomson	Michael	North Fort Myers Facility Operations, LLC	991 Pondella RD North Fort Myers FL 33903	Pondella Road OPCO LLC	Pondella Parent LLC	9/1/2023	Marlin Raydiant Fort Myers, Propco LLC / Welltower Inc
94	Davis	Larry	North Fort Myers Facility Operations, LLC	991 Pondella RD North Fort Myers FL 33903	Pondella Road OPCO LLC	Pondella Parent LLC	9/1/2023	Marlin Raydiant Fort Myers, Propco LLC / Welltower Inc
95	White	Jessie Mae	Orange Park Facility Operations, LLC	1215 Kingsley Ave Orange Park, FL 32073	1215 Kingsley Ave OPCO LLC	1215 Kingsey Ave OPCO Parent LLC	12/1/2023	
96	Jones	Juanita	Port Charlotte Facility Operations, LLC	18480 Cochran Blvd Port Charlotte, FL 33948	Port Charlotte OPCO LLC	Port Charlotte Member LLC	5/3/2022	18400 Cochran BLVD LLC / Altus Group
97	Murison	David	Port Charlotte Facility Operations, LLC	18480 Cochran Blvd Port Charlotte, FL 33948	Port Charlotte OPCO LLC	Port Charlotte Member LLC	5/3/2022	18400 Cochran BLVD LLC / Altus Group
98	Nielsen	Martin	West Altamonte Facility Operations, LLC	1099 West Town Parkway Altamonte Springs, FL 32714	West Altamonte OPCO LLC		5/3/2022	Crea W Altamonte LLC / Altus Group
99	Rousseau	Daniel	West Altamonte Facility Operations, LLC	1099 West Town Parkway Altamonte Springs, FL 32714	West Altamonte OPCO LLC		5/3/2022	Crea W Altamonte LLC / Altus Group
100	Taylor	Catherine	West Altamonte Facility Operations, LLC	1099 West Town Parkway Altamonte Springs, FL 32714	West Altamonte OPCO LLC		5/3/2022	Crea W Altamonte LLC / Altus Group

* 12170 Cortez Blvd Operations LLC No Controlling Interest Provided
 **195 Mattie M Kelly 4 different controlling Interest
 *** 777 Ninth Street No Controlling Interest Provided
 ****West Altamonte No Controlling Interest Provided