

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

IN RE:)	BANKRUPTCY CASE
)	NO. 24-55507-PMB
LAVIE CARE CENTERS, LLC, et)	JUDGE PAUL M. BAISIER
al.,)	CHAPTER 11
)	
Debtors.)	JOINTLY ADMINISTERED
)	
)	

**SUPPLEMENT TO OBJECTION TO CONFIRMATION AND POTENTIAL ASSIGNMENT
OF EXECUTORY CONTRACTS (Doc 321)**

COMES NOW CAROLINA REHABILITATION & SURGICAL ASSOCIATES (hereinafter referred to as "CAROLINA REHABILITATION"), a creditor of the above-named Debtors and files this its "Supplement To Objection to Confirmation", of the Debtors' Plan of Reorganization, showing to this Court as follows:

1.

On 08/28/2024, the Debtor filed a "Notice of Revised List of Potentially Assumed Executory Contracts and Unexpired Leases and Related Cure Cost" (doc 356).

2.

The Notice does not address and does not remedy the matters set forth in the objection (Doc 321) filed by Carolina Rehabilitation.

3.

Carolina Rehabilitation objects to the Notice (Doc 356) on the grounds set forth in the Objection filed by Carolina Rehabilitation (Doc 321), all of which is incorporated by this reference.



4.

The Plan, as proposed, does not provide to CAROLINA REHABILITATION acceptable treatment of its claims and violates 11 U.S.C. Section 1129.

WHEREFORE, CAROLINA REHABILITATION prays that confirmation and the assignment of executory contracts be denied.

This 6th Day of September, 2024.

LEVINE & BLOCK, LLC

BY: /s/ Ronald A. Levine
Ronald A. Levine, Esq.
[GA Bar No. 448736]
ATTORNEYS FOR MOVANT

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CERTIFICATE OF SERVICE

This is to certify that I have this date served a copy of the within and foregoing "Supplement to Objection to Confirmation" via electronic means as listed on the Court's ECF noticing system or by regular first class mail by depositing same in the United States mail in a properly addressed envelope with adequate postage thereon to insure delivery upon the following:

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This 6th day of September, 2024.

LEVINE & BLOCK, LLC

BY: /s/ Ronald A. Levine
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