

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

IN RE: Case No.: 24-55507-PMB  
LAVIE CARE CENTERS, LLC, et. al., Chapter 11  
Debtor. Cases Jointly Administered

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**RECOVERY CORP.'S  
OBJECTION TO THE TRANSACTION(S)  
AUTHORIZED WITHIN THE FINAL SALE ORDER**

Healthcare Negligence Settlement Recovery Corp. (the “Recovery Corp.”), by and through its undersigned counsel, hereby objects to the “Transaction(s)” as defined within this Court’s “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. 177] (the “Final Sale Order”).

On June 27, 204, the Final Sale Order was entered by this Court setting an auction (the “Auction”) of the “Assets”, as defined in the Final Sale Order, of the 282 chapter 11 debtors (collectively, the “Debtors”) for September 9, 2024. The Final Sale Order also set a deadline to object to the Transaction(s) of September 10,



2024, at 4:00 p.m. (the “Sale Objection Deadline”). Although the Auction did not occur due to the fact that there were no bids submitted in accordance with the terms of the Final Sale Order, Recovery Corp. submits this objection to the Transaction(s) in an abundance of caution so as to avoid any claim that Recovery Corp. waived its right to object to the Transaction(s) in the event the Auction is rescheduled.

Recovery Corp. objects to the Transaction(s) for the reasons set forth in “Recovery Corp.’s Motion to Dismiss or Convert Florida DivestCo Reorganizations” [Doc. 310] and “Recovery Corp.’s Objection to Confirmation of the Combined Plan” [Doc. 327], both of which are incorporated herein by reference. Given that the Auction of the Assets did not occur pursuant to the terms of the Final Sale Order, Recovery Corp. reserves the right to amend or supplement this objection to the Transaction(s), or any future contemplated sale of any of the Debtors’ assets.

DATED this 10th day of September, 2024.

/s/ John A. Anthony

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished on September 10th, 2024, by either the Court’s electronic noticing system

or by U.S. mail to all parties receiving electronic noticing, all creditors, and the Local Rule 1007-2 Parties in Interest List.

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/s/ John A. Anthony  
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