Case 24-05127-pmb	Doc 21	Filed 09/23/2/	2/1 Entered 00/22/	Entered 00/22/24 15:40:30 Docket #0021	Desc Main Date Filed: 9/23/2024
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## IN THE UNITED STATES BANKRUPTCY COURT NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

In re:

LAVIE CARE CENTERS, LLC, et al.,

Debtors.<sup>1</sup>

LAVIE CARE 1010) CENTERS, LLC; CARPENTERS WAY OPERATIONS LLC; 1120 ) WEST DONEGAN AVENUE OPERATIONS LLC; ) 11565 HARTS ROAD OPERATIONS LLC; 12170) CORTEZ BOULEVARD OPERATIONS LLC; 1465) OAKFIELD DRIVE OPERATIONS LLC; 15204) WEST COLONIAL DRIVE OPERATIONS LLC; ) 1550 JESS PARRISH COURT OPERATIONS LLC; ) 1615 MIAMI ROAD OPERATIONS LLC; 1851) ELKCAM BOULEVARD OPERATIONS LLC; 216) SANTA BARBARA BOULEVARD OPERATIONS ) LLC; 2333 NORTH BRENTWOOD CIRCLE) OPERATIONS LLC; 2826 CLEVELAND AVENUE) **OPERATIONS** LLC; 3001 PALM COAST) PARKWAY OPERATIONS LLC: 3101 GINGER ) DRIVE **OPERATIONS** LLC; 3735 EVANS) **AVENUE OPERATIONS** LLC: 4200) WASHINGTON STREET OPERATIONS LLC; 4641) OLD CANOE CREEK ROAD OPERATIONS LLC; ) 518 WEST FLETCHER AVENUE OPERATIONS) LLC: 5405 BABCOCK STREET OPERATIONS) LLC; 6305 CORTEZ ROAD WEST OPERATIONS ) LLC; 6414 13TH ROAD SOUTH OPERATIONS ) LLC; 6700 NW 10TH PLACE OPERATIONS LLC; ) 702 SOUTH KINGS AVENUE OPERATIONS LLC; ) 710 NORTH SUN DRIVE OPERATIONS LLC; 741) SOUTH BENEVA ROAD OPERATIONS LLC; 777) Chapter 11

Case No. 24-55507 (PMB)

(Jointly Administered)

Adversary Proc. No. 24-05127 (PMB)

Related to Adv. Docket Nos. 2, 3, 10, 14, 16

<sup>&</sup>lt;sup>1</sup> The last four digits of LaVie Care Centers, LLC's federal tax identification number are 5592. There are 282 Debtors in these chapter 11 cases, which are being jointly administered for procedural purposes only. A complete list of the Debtors and the last four digits of their federal tax identification numbers are not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <u>https://www.veritaglobal.net/LaVie</u>. The location of LaVie Care Centers, LLC's corporate headquarters and the Debtors' service address is 1040 Crown Pointe Parkway, Suite 600, Atlanta, GA 30338.



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NINTH STREET NORTH OPERATIONS LLC; 7950) LAKE UNDERHILL ROAD OPERATIONS LLC; ) ORANGE **BLOSSOM** 9311 SOUTH TRAIL) **OPERATIONS** LLC; 9355 SAN JOSE) **OPERATIONS** BOULEVARD LLC; BAYA) REHABILITATION, NURSING AND LLC; ) FACILITY OPERATIONS, BRANDON 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 ) LLC; OPERATIONS, MIAMI FACILITY) OPERATIONS, LLC; NEW PORT RICHEY) FACILITY OPERATIONS, LLC; NORTH FORT ) MYERS FACILITY OPERATIONS, LLC; ORANGE) PARK FACILITY OPERATIONS, LLC; PORT ) CHARLOTTE FACILITY OPERATIONS, LLC; ) TALLAHASSEE FACILITY OPERATIONS, LLC; ) TOSTURI, LLC; AND WEST ALTAMONTE ) FACILITY OPERATIONS, LLC;

Plaintiffs,

v.

HEALTHCARE NEGLIGENCE SETTLEMENT RECOVERY CORP.

Defendant.

## NOTICE OF RESCHEDULED HEARING WITH RESPECT TO DEBTORS' MOTION FOR ENTRY OF ORDER (I) EXTENDING THE AUTOMATIC STAY AND/OR PRELIMINARILY ENJOINING CLAIMS AND CAUSES OF ACTION AGAINST NON-DEBTOR DEFENDANTS AND (II) EXPEDITION ON <u>SEPTEMBER 30, 2024 AT 2:00 P.M. (PREVAILING EASTERN TIME)</u>

**PLEASE TAKE NOTICE** that on June 30, 2024, LaVie Care Centers, LLC ("<u>LaVie</u>") and certain of its affiliates and subsidiaries, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the "<u>Debtors</u>") filed the *Debtors' Motion for Entry of Order (I) Extending the Automatic Stay and/or Preliminarily Enjoining Claims and Causes of* 

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Action Against Non-Debtor Defendants and (II) Expedition [Adv. Docket No. 2] (the "<u>Motion</u>")<sup>2</sup> and the accompanying Brief in Support of Debtors' Motion for Entry of Order (I) Extending the Automatic Stay and/or Preliminarily Enjoining Claims and Causes of Action Against Non-Debtor Defendants and (II) Expedition [Adv. Docket No. 3] (the "<u>Brief</u>") with the United States Bankruptcy Court for the Northern District of Georgia (the "<u>Court</u>").

**PLEASE TAKE FURTHER NOTICE THAT** on July 19, 2024, Healthcare Negligence Settlement Recovery Corp. ("<u>Recovery Corp.</u>") filed its opposition to the Motion [Adv. Docket No. 10] and, on July 23, 2024, the Debtors filed a reply in support of the Motion [Adv. Docket No. 14].

**PLEASE TAKE FURTHER NOTICE THAT** on July 25, 2024, after hearing argument from the Debtors and Recovery Corp. on July 24, 2024, the Court entered an order [Adv. Docket No. 16] (the "<u>Stay Extension Order</u>"), granting the Motion and extending the automatic stay to the claims and causes of action asserted against the Non-Debtor Defendants in the Recovery Corp. Action until the earlier of (a) confirmation of a chapter 11 plan with respect to the Debtor Defendants, (b) dismissal of the Chapter 11 Cases of the Debtor Defendants, or (c) September 30, 2024, at which point a hearing (the "<u>Hearing</u>") shall be held at 9:30 a.m. (prevailing Eastern Time) to determine whether additional relief is necessary or appropriate.

**PLEASE TAKE FURTHER NOTICE THAT** the Hearing on the Motion has been rescheduled, with the consent of Recovery Corp., and will be held on **September 30, 2024, at 2:00 p.m. (prevailing Eastern Time)** in Courtroom 1202 at the Richard B. Russell Federal Building and United States Courthouse, 75 Ted Turner Dr. SW, Atlanta, Georgia 30303, which may be attended in person or via the Court's Virtual Hearing Room. You may join the Virtual Hearing Room through the "Dial-in and Virtual Bankruptcy Hearing Information" link at the top of the homepage of the Court's website, www.ganb.uscourts.gov, or the link on the judge's webpage, which can also be found on the Court's website. Please also review the "Hearing Information" tab on the judge's webpage for further information about the hearing. You should be prepared to appear at the hearing via video, but you may leave your camera in the off position until the Court instructs otherwise. Unrepresented persons who do not have video capability may use the telephone dial-in information on the judge's webpage.

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

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

<sup>&</sup>lt;sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion or the Brief, as applicable.

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Dated: Atlanta, Georgia September 23, 2024

## **MCDERMOTT WILL & EMERY LLP**

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- and -

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