

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;)

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
SEPTEMBER 30, 2024 AT 2:00 P.M. (PREVAILING EASTERN TIME)**

PLEASE TAKE NOTICE that on June 30, 2024, LaVie Care Centers, LLC (“LaVie”) and certain of its affiliates and subsidiaries, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the “Debtors”) filed the *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. 2] (the “Motion”)² 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 “Brief”) with the United States Bankruptcy Court for the Northern District of Georgia (the “Court”).

PLEASE TAKE FURTHER NOTICE THAT on July 19, 2024, Healthcare Negligence Settlement Recovery Corp. (“Recovery Corp.”) 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 “Stay Extension Order”), 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 “Hearing”) 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 (<https://www.veritaglobal.net/lavie>) 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.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion or the Brief, as applicable.

Dated: Atlanta, Georgia
September 23, 2024

MCDERMOTT WILL & EMERY LLP

/s/ Daniel M. Simon

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