

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

In re:)
LaVIE CARE CENTERS, LLC, *et al.*¹) Case No. 24-55507 (PMB)
) Chapter 11
) Cases Jointly Administered
Debtor.)

OFFICE BUSINESS SOLUTIONS, LLC'S
MOTION TO FILE LIMITED OBJECTION OUT OF TIME

COMES NOW, Creditor, Office Business Solutions, LLC (hereinafter referred to as “Creditor”), by and through counsel Elizabeth S. Lynch, and in support of this *Motion to File Limited Objection Out of Time* states as follows:

1. Creditor is the Lessor on a number of equipment leases for copiers and printers held by the Debtor, LaVie Care Centers, which fail to be listed on the Debtor’s Schedules nor are they included in the Debtor’s *Notice to Contract Parties to Potentially Assumed Executory Contracts and Unexpired Leases* dated July 23, 2024 [Docket No. 274] (the “Original Contract Assumption Notice”) or in the *Notice of Revised List of Potentially Assumed Executory Contracts and Unexpired Leases and Related Cure Costs* dated August 28, 2024 [Docket No. 356]. Such Leases, itemization of the property and anticipated location of such property are outlined in Exhibits and are incorporated herein by reference.

2. Debtor remains in possession of Creditor’s property. Creditor was not provided Notice of the objection deadline for the *Notice of Revised List of Potentially Assumed Executory*

¹ 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 <https://www.veritaglobal.net/LaVie>. 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.



Contracts and Unexpired Leases and Related Cure Costs, nor was Creditor disclosed on the list of assumed or rejected contracts. Debtor was not listed on the Mailing Matrix for noticing.

3. Debtor is in default on the Lease, has not outlined assumption or rejection of the Lease, and Creditor respectfully requests permission to file a *Limited Objection Out of Time* in order to preserve any rights it may be entitled to under the terms of the Lease.

WHEREFORE, for the foregoing reasons, Creditor respectfully requests that this Court enter an *Order* granting permission to file a *Limited Objection Out of Time* to enable Creditor to reserve its rights under the terms of the Lease, and for such other and further relief as is just and appropriate under the circumstances.

Dated: 09/23/2024

Respectfully submitted,

CHINNERY EVANS & NAIL, P.C.

/s/ Elizabeth S. Lynch

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ATTORNEY FOR CREDITOR

OFFICE BUSINESS SOLUTIONS, LLC

CERTIFICATE OF SERVICE

I hereby certify that on September 23, 2024, all ECF participants registered in this case were served electronically with the foregoing Motion through the Court's ECF system at their respective e-mail addresses registered with this Court.

Dated: 09/23/2024

CHINNERY EVANS & NAIL, P.C.

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