

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

IN RE:	)	CHAPTER 11
	)	
LAVIE CARE CENTERS, LLC, <i>et al.</i> , <sup>1</sup>	)	CASE NO. 24-55507-pmb
	)	
Debtors.	)	JOINTLY ADMINISTERED
	)	
<hr/>		Related to Docket No. 433

**OHI DIP LENDER, LLC’S RESPONSE IN OPPOSITION TO RECOVERY  
CORP.’S MOTION TO ESTABLISH STANDING TO CHALLENGE FINAL DIP  
FINANCING ORDER**

OHI DIP Lender, LLC submits this Response in Opposition to *Recovery Corp.’s Motion to Establish Standing to Challenge the Final DIP Financing Order* [Docket No. 433], by joining in the *Response of the Omega Parties<sup>2</sup> in Opposition to Recovery Corp.’s Motion to Establish Standing to Challenge Final DIP Financing Order* [Docket No. 471], which is incorporated herein by reference for all purposes.

WHEREFORE, for the reasons set forth in the *Response of the Omega Parties in Opposition to Recovery Corp.’s Motion to Establish Standing to Challenge Final DIP Financing*

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<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, for which the Debtors have requested joint administration. 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’ proposed claims and noticing agent at <https://www.kccllc.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.

<sup>2</sup> As used herein, the term “Omega Parties” shall mean the Prepetition Omega Secured Parties, which are the Omega Landlords and Prepetition Omega Term Loan Secured Parties, all as defined in the Final Order (I) Authorizing the Debtors to (A) Obtain Postpetition Financing And (B) Utilize Cash Collateral, (II) Granting Adequate Protection To Prepetition Secured Parties, (III) Modifying The Automatic Stay, and (IV) Granting Related Relief, dated June 28, 2024 [Docket No. 189].



*Order*, OHI DIP Lender, LLC specifically urges the Court to deny *Recovery Corp.*'s *Motion to Establish Standing to Challenge the Final DIP Financing Order*.

This 2nd day of October, 2024.

SCROGGINS, WILLIAMSON & RAY, P.C.

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**CERTIFICATE OF SERVICE**

This is to certify that I have on this day electronically filed the foregoing **OHI DIP Lender, LLC's Response in Opposition to Recovery Corp.'s Motion to Establish Standing to Challenge Final DIP Financing Order** using the Bankruptcy Court's Electronic Case Filing program, which sends a notice of this document and an accompanying link to this document to all parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program.

This 2nd day of October, 2024.

SCROGGINS, WILLIAMSON & RAY, P.C.

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