

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

In re: Chapter 11
LAVIE CARE CENTERS, LLC, *et al.*¹ Case No. 24-55507 (PMB)
Debtors. (Jointly Administered)
Related to Docket No. 140

DECLARATION OF ORDINARY COURSE PROFESSIONAL

I, Charles Y. Sipe, Esquire, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a GLPL Litigation Defense Counsel of Kiernan Trebach, LLP (the "Firm"), which maintains offices at 1108 E. Main Street, Suite 801, Richmond, Virginia, 23219.

2. This Declaration is submitted in connection with an order of the United States Bankruptcy Court for the Northern District of Georgia, Atlanta Division, entered on July 22, 2024, authorizing the above-captioned debtors and debtors-in-possession (collectively, the "Debtors") to employ and compensate certain professionals in the ordinary course of business during the pendency of the Debtors' chapter 11 cases (the "Chapter 11 Cases").

3. The Debtors have requested that the Firm provide services in connection with the Debtors' ongoing business operations and services ordinarily

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.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.



provided by non-bankruptcy counsel and professionals to the Debtors, and the Firm has agreed to provide such services.

4. The Firm is a legal services firm.

5. The Firm provided services to the Debtors prior to the filing of the Chapter 11 Cases on June 2, 2024.

6. The Firm's current customary rates, subject to change from time to time, are Senior Partners \$220.00 per hour; Associates \$220.00 per hour; and Paralegals \$100.00 per hour.

7. The Firm may have performed services in the past, may currently perform services, and may perform services in the future in matters unrelated to the Debtors or the Chapter 11 Cases, for persons that are parties-in-interest in the Debtors' Chapter 11 Cases. To the best of my knowledge, the Firm does not perform services for any such person in connection with the Chapter 11 Cases, or have any relationship with any such person, its attorneys, or its accountants that would be adverse to the Debtors or their estates.

8. Neither I nor any Managing Partner, Chief Financial & Administrative Officer, Firm Co-Chair, General Counsel, Partner, or professional employed by the Firm, insofar as I have been able to ascertain, holds, or represents any interest adverse to, the Debtors or their estates with respect to the matter(s) upon which the Firm is to be employed.

9. Neither I nor any Managing Partner, Chief Financial & Administrative Officer, Firm Co-Chair, General Counsel, Partner, or professional employed by the Firm has agreed to share or will share any portion of the compensation to be received

from the Debtors with any other person other than the principals and regular employees of the Firm, as permitted by 11 U.S.C. § 504(b).

10. The Firm holds no retainer that is applicable to post-petition services.

11. The Firm is conducting further inquiries regarding its retention by any creditors of the Debtors, and upon conclusion of that inquiry, or at any time during the period of its employment, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Declaration.

I declare under penalty of perjury that, to the best of my knowledge and belief after reasonable inquiry, the foregoing is true and correct.

Executed on this 23rd day of October, 2024.



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