

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

In re: Case No.: 24-55507-PMB  
LAVIE CARE CENTERS, LLC, et. al.,<sup>1</sup> Chapter 11  
Debtor. Cases Jointly Administered

**NOTICE OF HEARING**

**PLEASE TAKE NOTICE** that the Florida Claimants<sup>2</sup>, by and through their undersigned counsel, seek a hearing on “Recovery Corp.’s Motion to Establish

<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> Corrado Burdieri, as Personal Representative of the Estate of Theresa Mary Burdieri, Danielle Anglade, as Personal Representative of the Estate of Maria Joseph, Dennis Samson, as Personal Representative of the Estate of Marguerite Sampson, Carmen Millsap, as Personal Representative of the Estate of James Millsap, Erin Poarch, Individually and as Personal Representative of the Estate of William A. Thompson, Rebecca Barrow, as Personal Representative of the Estate of Carolyn Wayt, Michelle Stawicki, as Personal Representative of the Estate of Nancy A. Cherba, Janelle J. Guelich, as Personal Representative of the Estate of Judy Guelich, Charles Mazza, as Personal Representative of the Estate of Alfonso Mazza, Margaret Jones-Frison, as Personal Representative of the Estate of Dorothy Johnson Norris, Linda Solash-Reed, as Personal Representative of the Estate of Billy Joe Early, Kendra Mae Mize, as Personal Representative of the Estate of Ingrid K. Lane, Teresa Margraf, Personal Representative of the Estate of Mary Holt, Gerard Celestin, as Personal Representative of the Estate of Sylvia Celestin, Nancy Roark, as Personal Representative of the Estate of Mary Ashley, Jacqueline D. Aker, as Personal Representative of the Estate of Kevin R. Aker, Marie Cherjsier, as Personal Representative of the Estate of Philomene A. Antoine, Qiana Watson, as Personal Representative of the Estate of Anna



---

Marie Brown Smith, Joseph Cunningham, as Power of Attorney for Jeffrey J. Cunningham, Quenjta L. Donald, as Personal Representative of the Estate of Charles Donald, Pamela Foster, as Personal Representative of the Estate of Mary Foster, Donald Garrett, Albert J. Gates, Ill, as Personal Representative of the Estate of Shirley Gates, Benny Gibson, Mindy Stoltz, as Power of Attorney for John M. Griffin, Tyler Hall Eagleson, as Personal Representative of the Estate of James Edward Hall, Cheryl Waggoner, as Personal Representative of the Estate of Joan Kay Higgins, Johnnie Mae Jones Smith, as Personal Representative of the Estate of Juanita Jones, Angela Pinkney, Personal Representative of the Estate of Mae Liza Knight, Billy Manuel, as Personal Representative of the Estate of Anthony Manuel, Lydia Martinez as Personal Representative of the Estate of Luz M. Martinez, Alberta Walls, as Personal Representative of the Estate of Gwendolyn McCray, Shannon Castro, as Power of Attorney for Vernon Lee Meyer, Julienne Josph, as Power of Attorney for Juliette Mompont, Joshua R. Nielsen, as Personal Representative of the Estate of Martin Nielsen, Avram S. Oegar, as Personal Representative of the Estate of Avram Oegar, Gonzalo Padron, as Personal Representative of the Estate of Marina Padron, Karel S. Bennett, as Personal Representative of the Estate of Suzanne Perez, Elizenda Pina Torres, as Personal Representative of the Estate of Mirelle Pina, Laura Reyes, as Power of Attorney for Delia Rodriguez, Maria Herrera, as Personal Representative of the Estate of Aldemaro Rojas, Alilla Stover, as Personal Representative of the Estate of Machrell Stover, Marje C. Louine, as Personal Representative of the Estate of Rosita Thenor, Linda Tillman, as Personal Representative of the Estate of Bertha Tillman, Rodney Christopher Vargas, as Personal Representative of the Estate of Gerardo Vargas, Anna Wendolyn Wilkie, as Personal Representative of the Estate of Barbara Wilkie Jennie Zayas, as Personal Representative of the Estate of Edwin A. Zayas Torres, Wright, Mary Angela, Thomas Graham, as Personal Representative of the Estate of Madeline Graham, David O'Berry, as Personal Representative of the Estate of Barbara O'Berry, Jennifer Varela, a Personal Representative of the Estate of Rosenda Clavijo, Michael D. Thompson, as Personal Representative of the Estate of Christine Thompson, Daniel Rousseau, as Personal Representative of the Estate of Gertrude Rousseau, Stacey Abel, as Personal Representative of the Estate of Bebee Abel, Yvonne Kolbe, as Personal Representative of the Estate of Richard Kolbe, Jerri Owens, as Power of Attorney for Lular Owens, Don Howard, Jr., as Personal Representative of the Estate of Don Howard, Laura Knicley, as Personal Representative of the Estate of Peggy Knicley, Vickie McHenry, Brett Rigas, as Personal Representative of the Estate of Gail Rigas, Annabelle Rios, as Power of Attorney for Gloria Rojas, Lashell Taylor, as Personal Representative of the Estate of Catherine Taylor, Howard Williams, as Personal Representative of the Estate of Nessa Williams, Tiffany Bivins, as Personal Representative of the Estate of Tereather Powell, Rita Baar, as Power of Attorney for Delano Skow, Norma Barry, as Power of Attorney for John Barry, Jechiel Bershanski, as Power of Attorney for Nelia Bershanski, Jill R. Davis, as Personal Representative of the Estate of Larry R. Davis [Debtor: North Fort Myers Facility Operations, LLC d/b/a Consulate Health Care of North Fort Myers], Jill R. Davis, as Personal Representative of the Estate of Larry R. Davis [Debtor: 777 Ninth Street North, LLC d/b/a Heritage Healthcare and Rehabilitation Center], Diane Malcomb, as Personal Representative of the Estate of Buddy R. Malcomb, Darlene Yvette Cuves, as Personal Representative of the Estate of David McGhee, Darlene L. Murison, as Personal Representative of the Estate of David G. Murison, Orlando Ortiz, as Personal Representative of the Estate of Crispin D. Ortiz, Lesia A. Rucker, Personal Representative of the Estate of Mildred G. Fluellen, Teresa R. Woodard, as Power of Attorney for Chester L. Woodard, Sharon Acevedo, Harry Barrett, Connie Blair, as Personal Representative of

Standing to Challenge Final DIP Financing Order” [Doc. 433], filed on September 16, 2024, “Recovery Corp.’s Combined (A) Reply in Opposition to Standing Objections and (B) Motion for Relief from Final Financing Order Under Federal Rule of Civil Procedure 60” [Doc. 523], filed on October 8, 2024 (together, the “Standing Motions”), and related papers with the Court seeking an order that will (a) establish that the Florida Claimants have standing to object to the Final DIP Financing Order [Doc. 189] to challenge the Stipulations as they relate to or bind the Florida DivestCo Debtors, (b) grant relief from the Final DIP Financing Order under Federal Rule of Civil Procedure 60, and (c) grant such other relief as this Court may determine to be just and appropriate.

**PLEASE TAKE FURTHER NOTICE** that the Court will hold a hearing on the Motion at **9:30 a.m.** on **November 14, 2024**, at **United States Bankruptcy**

---

the Estate of Bobby Blair, Gwendolyn Cage, as Personal Representative of the Estate of Doneatha Cobb, Jose R Diaz, as Personal Representative of the Estate of Jose Rafael Diaz, Tracy Lynn Druelle, as Power of Attorney for Catherine Druelle, Emma Foster, as Plenary Guardian of the ward, Levi Foster, Nola Gager as Personal Representative of the Estate of Ehud Gager, Constance A.M. Brant, as Power of Attorney for Mary J. Hause, Geraldine Hill, as Personal Representative of the Estate of Roosevelt Hill, Gloria MacKey, Donald McKenzie, as Personal Representative of the Estate of Stanley McKenzie, Melissa Smith, as Personal Representative of the Estate of Nettie P. McKinnion-Murphy, Anna Hollins, as Personal Representative of the Estate of Doris Mitchell, Donald Moran, as Power of Attorney for Doris Moran, John Paul, as Personal Representative of the Estate of Karen Paul-Bennett, Sharon Scott, as Personal Representative of the Estate of Moses Scott, III, Juanita Davila, as Power of Attorney for Rafael Vega, James Walker, as Personal Representative of the Estate of Louise Walker, Dennis W. Walker, Jr., as Personal Representative of the Estate of Lula Mae Walker, Susan Whitcomb, Stephania Redding, as Personal Representative of the Estate of Jessie White, Timothy F. Sullivan, as Personal Representative of the Estate of Kathleen Mary Fallaha, Regina Rush, as Personal Representative de son tort, Avery Ash, Gerald Collins, as Executor de son Tort, of the Estate of Lorene Collins, Ada Felder, as Power of Attorney for Miriam Lizardi (collectively, the “Florida Claimants”).

**Court for the Northern District of Georgia, 75 Ted Turner Drive SW, Courtroom 1202, 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](http://www.ganb.uscourts.gov), or the Virtual Hearing Room link on Judge Baisier’s webpage, which can be found at <https://www.ganb.uscourts.gov/content/honorable-paul-m-baisier>. Please also review the “Hearing Information” tab on Judge Baisier’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.

Your rights may be affected by the Court’s ruling on these pleadings. You should read these pleadings carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.) If you do not want the Court to grant the relief sought in these pleadings or if you want the Court to consider your views, then you and/or your attorney must attend the hearing. You may also file a written response to the pleadings with the Clerk at the address stated below, but you are not required to do so. If you file a written response, you must attach a certificate stating when, how

and to whom (including addresses) you served the response. Mail or deliver your response so that it is received by the Clerk before the hearing. The address of the Clerk's Office is: Clerk, U. S. Bankruptcy Court, Suite 1340, 75 Ted Turner Drive, SW, Atlanta Georgia 30303. You must also mail a copy of your response to the undersigned at the address stated below.

DATED this 28th day of October, 2024.

/s/ John A. Anthony  
**JOHN A. ANTHONY, ESQUIRE**  
Florida Bar Number: 0731013  
janthony@anthonyandpartners.com  
**ANTHONY & PARTNERS, LLC**  
100 S. Ashley Drive, Suite 1600  
Tampa, Florida 33602  
Tel.: (813) 273-5616 | Fax: (813) 221-4113  
Attorneys for Recovery Corp.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished on October 28, 2024, by either the Court's electronic noticing system or by U.S. mail to all parties receiving electronic noticing, all creditors, and the Local Rule 1007-2 Parties in Interest List.:

La Vie Care Centers, LLC  
c/o Ankura Consulting Group, LLC  
485 Lexington Avenue, 10th Floor  
New York, New York 10017  
Attn: M. Benjamin Jones  
ben.jones@ankura.com  
Debtor

Daniel M. Simon, Esquire  
McDermott Will & Emery LLP  
1180 Peachtree St. NE, Suite 3350  
Atlanta, Georgia 30309  
dmsimon@mwe.com  
Counsel for Debtors

Nathan M. Bull, Esquire  
McDermott Will & Emery LLP  
333 SE 2nd Avenue, Suite 4500  
Miami, Florida 33131  
nbull@mwe.com  
Counsel for Debtors

Landon W. Foody, Esquire  
McDermott Will & Emery LLP  
444 West Lake Street, Suite 4000  
Chicago, Illinois 60606  
lfoody@mwe.com  
Counsel for Debtors

/s/ John A. Anthony

**ATTORNEY**