

**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)

**OFFICIAL COMMITTEE OF UNSECURED CREDITORS’ JOINDER TO DEBTORS’  
OBJECTION TO WILLIAM BURNHAM MOTION TO LIFT  
OR MODIFY THE AUTOMATIC STAY**

The Official Committee of Unsecured Creditors (the “Committee”) of the above-captioned debtors and debtors-in-possession (the “Debtors”), by and through its undersigned counsel, hereby joins (this “Joinder”) in the *Debtors’ Objection to William Burnham Motion to Lift or Modify the Automatic Stay* [D.I. 596] (the “Objection”)<sup>2</sup> with respect to the *Motion to Lift or Modify the Automatic Stay to (1) Liquidate Personal Injury Tort Claim in Pending Litigation, (2) Pursue Recovery to the Extent of Insurance Coverage, and (3) Grant Related Relief* [Docket No. 564] (the “Lift Stay Motion”), filed by William Burnham (the “Movant”). In further support of this Joinder, the Committee respectfully states as follows:

**BACKGROUND**

1. On June 2, 2024 and June 3, 2024 (together, the “Petition Dates”), the Debtors filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code, initiating the above-

---

<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, 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.

<sup>2</sup> Capitalized terms not defined herein are defined in the Objection or the Lift Stay Motion, as applicable.



captioned chapter 11 cases (the “Chapter 11 Cases”). The Debtors remain in possession of their property and continue to operate their business as debtors-in-possession in accordance with Sections 1107 and 1108 of the Bankruptcy Code.

2. On June 13, 2024, the Office of the United States Trustee organized the Committee and appointed its members.

3. On September 30, 2024, the Debtors filed the *Debtors’ Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* [Docket No. 462], and on October 1, 2024, the Debtors filed a revised version of their combined disclosure statement and plan [Docket No. 481] (the “Plan”).<sup>3</sup> A key component of the proposed Plan is the implementation of Unliquidated Claim Procedures, which includes mandatory mediation of unliquidated claims such as those at issue in the Motion.

4. On September 30, 2024, the Debtors filed an Omnibus Objection, opposing multiple stay relief motions similar to the Stay Relief Motion, whereby movants sought to liquidate various personal injury claims against the Debtors. On October 11, 2024, the Committee Filed the Committee Joinder, joining in the Debtors’ opposition to the various lift stay motions. For the reasons set forth therein, the Debtors and Committee argued, among other things, that the various stay relief movants failed to meet their burden to lift the automatic stay and that permitting the stay to be lifted for the movants would interfere with the Unliquidated Claims Procedures to be included within the Plan.

5. On October 16, 2024, the Movant filed the Stay Relief Motion. Like the stay relief motions previously opposed by the Debtors and the Committee, the Stay Relief Motion seeks to

---

<sup>3</sup> As previously discussed on the record at prior hearings, there are hundreds of personal injury claims that have been filed against the Debtors, the review of which remains in the early stages.

liquidate a personal injury claim against Debtor 4641 Old Canoe Creek through prosecution of the Burnham State Court Action in Florida state court.

6. The Debtors subsequently filed the Objection.

### **JOINDER**

7. The Debtors' Objection sets forth reasons why the automatic stay should not be lifted at this time for any individual creditor, including Movant. First and foremost, granting the Lift Stay Motion would unfairly prejudice the interests of other general unsecured creditors. The Debtors report in the Objection that the Midwest Insurance Policy, which is the applicable insurance policy vis-à-vis the Burnham State Court Action, is a "reimbursement-only" policy. Objection, ¶ 13. Further, the Debtors report that under the Midwest Insurance Policy, "(a) the Debtors bear the cost to defend claims, (b) the Debtors are only entitled to reimbursements from the applicable insurers, (c) such reimbursements are only from collateral that the relevant insurers no longer hold, and (d) such reimbursements are only paid for timely claims which the Debtors understand were not made." *Id.* Accordingly, it appears that the Debtors do not actually have third-party insurance coverage for the claims the Movant wishes to pursue if the automatic stay is lifted. Thus, contrary to the Movant's assertion that "[p]roceeding against the subject insurer will not deplete the estate," *see* Lift Stay Motion, ¶ 10, allowing the Movant to prosecute the Burnham State Court Action would drain estate funds, harming other general unsecured creditors.

8. Granting the Lift Stay Motion would also lead to an inequitable result, giving Movant different treatment from fellow unsecured creditors. The Debtors and the Committee have worked to finalize the Unliquidated Claim Procedures provided for by the Plan, the form of which was filed with the Plan Supplement on October 28, 2024 [Docket No. 593]. It is unnecessary and inappropriate to allow Movant to liquidate his claims directly in state court—and deplete estate

funds that could go toward all unsecured creditor recoveries—while all other similarly-situated creditors follow the Unliquidated Claims Procedures, which implement a more efficient mediation process. The Lift Stay Motion provides no compelling reason to grant Movant unique treatment under the circumstances.

9. By filing this Joinder, the Committee in no way minimizes the claims described in, and pursued through, the Lift Stay Motion. The Committee recognizes the importance of resolving these claims in an efficient manner that is fair to *all* similarly-situated creditors. The Committee submits that resolving these claims in a controlled and orderly chapter 11 process is in the best interests of the Debtors, their estates and all general unsecured claimants.

**CONCLUSION**

WHEREFORE, the Committee respectfully requests that the Court sustain the Debtors' Objection and this Joinder and deny the Lift Stay Motion.

*[Signature Page Follows]*

Dated: October 29, 2024

**TROUTMAN PEPPER HAMILTON SANDERS LLP**

/s/ Pierce E. Rigney

Pierce E. Rigney (GA ID No. 656946)  
600 Peachtree Street, NE, Suite 3000  
Atlanta, GA 30308  
Telephone: 404.885.3901  
Email: pierce.rigney@troutman.com

-and-

Francis J. Lawall (admitted *pro hac vice*)  
3000 Two Logan Square  
Eighteenth and Arch Streets  
Philadelphia, PA 19103-2799  
Telephone: 215.981.4481  
Email: francis.lawall@troutman.com

-and-

Mathew R. Brooks (GA ID #378018)  
Deborah Kovsky-Apap (admitted *pro hac vice*)  
875 Third Avenue  
New York, NY 10022  
Telephone: 212.704.6000  
Email: matthew.brooks@troutman.com  
deborah.kovsky@troutman.com

*Counsel for the Official Committee of Unsecured  
Creditors*

**CERTIFICATE OF SERVICE**

I hereby certify that on October 29, 2024, all ECF participants registered in this case were served electronically with the foregoing through the Court's ECF system at their respective email addresses registered with the Court.

I further certify that on October 29, 2024, I caused a true and correct copy of the Motion to be served by first class mail to the entities on the service list attached here to as

**Exhibit I.**

*/s/ Pierce E. Rigney*

\_\_\_\_\_  
Pierce E. Rigney (GA ID No. 656946)  
Troutman Pepper Hamilton Sanders LLP  
600 Peachtree Street, NE, Suite 3000  
Atlanta, GA 30308  
Telephone: (404) 885-3901  
Email: pierce.rigney@troutman.com

*Counsel to the Official Committee of  
Unsecured Creditors*

**Exhibit I**

Limited Service List

Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip	Country	Phone	Fax	Email
Counsel to American Federation of State, County & Municipal Employees, AFL-CIO (AFSCME)	American Federation of State, County & Municipal Employees, AFL-CIO	Matthew Stark Blumin, Office of General Counsel	1101 17th Street NW, Suite 900			Washington	DC	20036				MBLumin@afscme.org
Creditors Committee Member / Top 30 Creditor	Amidon Nurse Staffing, LLC	Eli Schick	1732 Kingsley Avenue, Suite 1			Orange Park	FL	32073		352-877-4444		eschick@amidonns.com
Creditors Committee Member / Top 30 Creditor	Amidon Nurse Staffing, LLC		PO Box 436			Malverne	NY	11565		904-374-5904		eschick@amidonns.com
Creditors Committee Member / Counsel for Claimants and Interested Parties	Anthony and Partners, LLC	John Anthony	100 S. Ashley Drive, Suite 1600			Tampa	FL	33602		813-273-5616		janthony@anthonyandpartners.com; cfosdick@anthonyandpartners.com; eservice@anthonyandpartners.com
Counsel to Jacksonville Nursing Home, Ltd.	Baker Donelson Bearman Caldwell & Berkowitz, PC	Kathleen G Furr	3414 Peachtree Road, N.E., Suite 1500	Monarch Plaza		Atlanta	GA	30326		404-577-6000	404-221-6533	Kfurr@BakerDonelson.com
Counsel to Floridean SNF Operations, LLC, Baya Pointe SNF Operations, LLC, and Osprey SNF Operations, LLC	Berman Fink Van Horn, P.C.	Lydia M. Hilton, William J. Piercy	3475 Piedmont Road, NE	Suite 1640		Atlanta	GA	30305		404-261-7711	404-233-1943	lhilton@bvfvlaw.com; wpiercy@bvfvlaw.com; bpiercy@bvfvlaw.com
Counsel to Empirian Health, LLC	Burr & Forman LLP	Derek F Meek	420 North 20th Street, Suite 3400			Birmingham	AL	35203		205-251-3000	205-458-5100	dmeek@burr.com
Counsel to Healthcare Services Group, Inc.	Burr & Forman LLP	Graham H Stieglitz	1075 Peachtree Street, N.E., Suite 3000			Atlanta	GA	30309		404-815-3000	404-817-3244	gstieglitz@burr.com
Creditors Committee Member	CDB Services USA, LLC	Sidney Robert Bradley	3707 W. Jetton Avenue			Tampa	FL	33629		813-769-9127		Sidney.Bradley@wecarestaffservices.com
Centers for Medicare & Medicaid Services	Centers for Medicare & Medicaid Services		7500 Security Blvd			Baltimore	MD	21244				
Counsel to Office Business Solutions, LLC	Chinnery Evans & Nail, P.C.	Elizabeth S. Lynch	800 NE Vanderbilt Lane			Lee's Summit	MO	64064		816-525-2050	816-525-1917	blynch@chinnery.com
Co-counsel to Davies Claims Solutions, LLC	Cohen Pollock Merlin Turner, P.C.	Bruce Z. Walker	3350 Riverwood Parkway, Suite 1600			Atlanta	GA	30339		770-858-1288	770-858-1277	bwalker@cpmtlaw.com
Counsel to Lawrenceville SNF Operations LLC, Fork Union SNF Operations LLC, Westover Hills SNF Operations LLC, Williamsburg SNF Operations LLC, Staunton SNF Operations LLC, Winchester SNF Operations LLC, Chelsea Operator LLC, Belmont Bay Operator, LLC, Southampton Operator, LLC, and Alexandria Operator, LLC	Copeland, Stair, Valz & Lovell LLP	Mark D. Lefkow, D. Gary Lovell, Jr.	P.O. Box 56887			Atlanta	GA	30343-0887		404-221-2325; 843-266-8213	404-523-2345	mlefkow@csvl.law; glovell@csvl.law
Counsel to the Debtors' Proposed DIP Lenders (TIX 33433 LLC)	DLA Piper LLP (US)	Attn James Muenker	1900 N Pearl St, Suite 2200			Dallas	TX	75201		214-743-4559	214-743-4545	james.muenker@dlapiper.com
Counsel to the Debtors' Proposed DIP Lenders (TIX 33433 LLC)	DLA Piper LLP (US)	Attn Kira Mineroff	1251 Avenue of the Americas			New York	NY	10020		212-335-4932		kira.mineroff@dlapiper.com
Counsel to the Debtors' Proposed DIP Lenders (TIX 33433 LLC)	DLA Piper LLP (US)	Joseph A. Roselius	444 W. Lake St., Suite 900			Chicago	IL	60606-0089		312-368-7034		joseph.roselius@us.dlapiper.com
Counsel to the Debtors' Proposed DIP Lenders (TIX 33433 LLC)	DLA Piper LLP (US)	Emily Marshall	1201 West Peachtree Street NW			Atlanta	GA	30309		404-736-7800	404-682-7800	emily.marshall@us.dlapiper.com
Counsel to Elderberry Nursing Home Landlords	Elderberry	Attn C. Lynch Christian, III	1000 Church Street, Third Floor			Lynchburg	VA	24504			434-846-8416	clchristian@1000churchstreet.com
Counsel to the Prepetition Omega Secured Parties, Omega Landlords, and Proposed DIP Lenders (OHI DIP Lender, LLC & OHI Mezz Lender, LLC)	Ferguson Braswell Fraser Kubasta PC	Attn Leighton Aiken	2500 Dallas Parkway, Suite 600			Plano	TX	75093		469-440-5405; 972-378-9111		laiken@fbfk.law
State Attorney General	Florida Attorney General	Attn Bankruptcy Department	PL-01 The Capitol			Tallahassee	FL	32399-1050		850-414-3300	850-487-2564	citizenservices@myfloridalegal.com; oag.civil.serve@myfloridalegal.com
State Attorney General	Georgia Attorney General	Attorney General Chris Carr	40 Capitol Square, SW			Atlanta	GA	30334		404-458-3600	404-657-8733	Agcarr@law.ga.gov
Georgia Department of Revenue	Georgia Department of Revenue	Attn Bankruptcy Dept	State Revenue Commissioner	1800 Century Blvd NE, Suite 15300		Atlanta	GA	30345				
Counsel to Welltower NNN Group, LLC	Gibson, Dunn & Crutcher LLP	Jeffrey C. Krause, Michael G. Farag	333 South Grand Avenue			Los Angeles	CA	90071		213-229-7995		jkrause@gibsondunn.com; mfarag@gibsondunn.com
Counsel to the Prepetition Omega Secured Parties, Omega Landlords, and Proposed DIP Lenders (OHI DIP Lender, LLC & OHI Mezz Lender, LLC)	Goodwin Procter LLP	Attn Robert J Lemons, Liza L. Burton	The New York Times Building	620 Eighth Avenue		New York	NY	10018		212-813-8925; 212-813-8971		RLemons@goodwinlaw.com; lburton@goodwinlaw.com
Counsel to Harts Harbor Health Landlords	Harts Harbor	Baker Donelson Bearman Caldwell & Berkowitz, PC	Attn Sandra Adams	200 East Broward Blvd, Suite 2000		Fort Lauderdale	FL	33301				sadams@bakerdonelson.com
Counsel to New Port Richey Opco, LLC, Pensacola Opco, LLC, Brandon Health Opco, LLC, Port Charlotte OpCo, LLC, Bayonet Opco, LLC, Sarasota Opco, LLC, Melbourne Opco LLC, Kissimmee Opco, LLC, and West Altamonte Opco, LLC	Hawkins Parnell & Young, LLP	Carl H. Anderson, Jr.	303 Peachtree Street, NE, Suite 4000			Atlanta	GA	30308-3243		404-614-7400	855-889-4588	canderson@hpylaw.com
Creditors Committee Member	Healthcare Negligence Settlement Recovery Corp.	John M. Herskowitz	c/o John A. Anthony	100 S. Ashley Drive, Suite 1600		Tampa	FL	33602		813-273-5616		janthony@anthonyandpartners.com
Creditors Committee Member / Top 30 Creditor	Healthcare Services Group	Patrick J Orr, Pete Nenstiel	3220 Tilman Drive, Suite No 300			Bensalem	PA	18201		215-688-4359		porr@hcsgrcorp.com; pnenstiel@hcsgrcorp.com
Internal Revenue Service	Internal Revenue Service	Centralized Insolvency Operation	2970 Market St			Philadelphia	PA	19104			855-235-6787	Mimi.M.Wong@irscounsel.treas.gov
Internal Revenue Service	Internal Revenue Service	Centralized Insolvency Operation	PO Box 7346			Philadelphia	PA	19101-7346		800-973-0424	855-235-6787	Mimi.M.Wong@irscounsel.treas.gov



Limited Service List

Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip	Country	Phone	Fax	Email
Counsel to CAREmasters Homehealth LLC and CAREmasters Healthcare Services LLC	Jones & Walden LLC	Thomas T. McClendon	699 Piedmont Avenue, NE			Atlanta	GA	30308		404-564-9300		trmcclendon@joneswalden.com
Claims and Noticing Agent	KCC dba Verita	Sydney Reitzel	222 N Pacific Coast Highway, Ste 300			El Segundo	CA	90245		877-709-4750; 424-236-7230		LVCCinfo@kccllc.com
Counsel to Powerback Rehabilitation, LLC d/b/a Powerback Rehabilitation and Respiratory Health Services, LLC d/b/a Powerback Respiratory	Keck Legal, LLC	Benjamin R. Keck	2801 Buford Hwy NE, Suite 115			Atlanta	GA	30329		470-826-6020		bkeck@kecklegal.com
Counsel to LEAF Capital Funding, LLC	Kilpatrick Townsend & Stockton LLP	Paul M. Rosenblatt	1100 Peachtree St NE, Suite 2800			Atlanta	GA	30309		404-815 6321	404-541-3373	prosenblatt@ktslaw.com; ecfnotices@ktslaw.com
Counsel for Claimants and Interested Parties	Lamberth, Cifelli, Ellis & Nason, PA	G. Frank Nason, IV	6000 Lake Forrest Drive, NW Suite 435			Atlanta	GA	30328		404-262-7373; 404-495-4468		fnason@lcnlaw.com
Debtors	LaVie Care Centers LLC	M Benjamin Jones	c/o Ankura Consulting Group, LLC	485 Lexington Avenue, 10th Floor		New York	NY	10017				
Counsel for the Debtors and Debtors-in-Possession	McDermott Will & Emery, LLP	Daniel M Simon	1180 Peachtree Street NE, Suite 3350			Atlanta	GA	30309		404-260-8535	404-393-5260	dmsimon@mwe.com
Counsel for the Debtors and Debtors-in-Possession	McDermott Will & Emery, LLP	Emily C Keil	444 West Lake Street, Suite 4000			Chicago	IL	60606		312-372-2000	312-984-7700	ekeil@mwe.com
Counsel for the Debtors and Debtors-in-Possession	McDermott Will & Emery, LLP	Jake Jumbeck, Catherine Lee	444 West Lake Street, Suite 4000			Chicago	IL	60606		312-372-2000	312-984-7700	jjumbeck@mwe.com; cleee@mwe.com
State Attorney General	Mississippi Attorney General	Attn Bankruptcy Department	Walter Sillers Building	550 High St Ste 1200		Jackson	MS	39201		601-359-3680		
Counsel to CREA Brandon-C LLC and Brandon Health OpCo, LLC	Nelson Mullins Riley & Scarborough, LLP	Shane G. Ramsey	1222 Demonbreun St., Suite 1700			Nashville	TN	37203		615-664-5355	615-664-5399	shane.ramsey@nelsonmullins.com
State Attorney General	North Carolina Attorney General	Attn Bankruptcy Department	9001 Mail Service Center			Raleigh	NC	27699-9001		919-716-6400	919-716-6750	ncago@ncdoj.gov
Office of the United States Trustee for the Northern District of Georgia	Office of the United States Trustee	Jonathan S. Adams, R. Jeneane Treace	362 Richard B Russell Bldg	75 Ted Turner Drive, SW		Atlanta	GA	30303		404-331-4437; 404-331-4438; 404-331-4076	404-730-3534	USTP.Region21@usdoj.gov; Jonathan.S.Adams@usdoj.gov; jeneane.treace@usdoj.gov
Creditors Committee Member / Top 30 Creditor	Omnicare Inc	Foley & Lardner, LLP	Geoff Goodman	321 North Clark Street, Suite 300		Chicago	IL	60654		312-832-4514		GGoodman@foley.com
Creditors Committee Member / Top 30 Creditor	Omnicare Inc	Greg Day	6825 W. Galveston Street, #3			Chandler	AZ	85226		928-848-9643		Gregory.Day@CVSHealth.com
Counsel to Carolina Rehabilitation & Surgical Associates, P.A.	Pamela P. Keenan		PO Box 19766			Raleigh	NC	27619-9766		919-848-0420	919-848-4216	pkeenan@kirschlaw.com
Counsel to the Debtors' Prepetition ABL Lender (MidCap Funding IV Trust)	Parker, Hudson, Rainer & Dobbs LLP	Bryan E. Bates	303 Peachtree Street NE, Suite 3600			Atlanta	GA	30308		404-420-4333	404-522-8409	bbates@phrd.com
State Attorney General	Pennsylvania Attorney General	Attn Bankruptcy Department	16th Floor, Strawberry Square			Harrisburg	PA	17120		717-787-3391	717-787-8242	info@attorneygeneral.gov
Counsel to CDB Services USA LLC d/b/a weCare Staffing Services	Pierson Ferdinand LLP	Susan V Warner	333 SE 2nd Avenue, Suite 2000			Miami	FL	33131		786-310-0637		susan.warner@pierferd.com
Creditors Committee Member / Counsel to CDB Services USA LLC d/b/a weCare Staffing Services	Pierson Ferdinand LLP	Thomas R Walker	260 Peachtree Street NW, Suite 2200			Atlanta	GA	30303		404-566-6988		thomas.walker@pierferd.com
Counsel to Welltower NNN Group, LLC	Polsinelli, PC	David E Gordon, Caryn E Wang, Ashley D Champion	1201 West Peachtree, Street NW, Suite 1100			Atlanta	GA	30309		404-253-6005		dgordon@polsinelli.com; cewang@polsinelli.com; achampion@polsinelli.com
Counsel to the Debtors' Prepetition ABL Lender (MidCap Funding IV Trust)	Proskauer Rose LLP	Attn Charles A Dale	One International Place			Boston	MA	02110		617-526-9870		cdale@proskauer.com
Counsel to the Debtors' Prepetition ABL Lender (MidCap Funding IV Trust)	Proskauer Rose LLP	Dylan Marker	Eleven Times Square			New York	NY	10036-8299		212- 969-3413		dmarker@proskauer.com
Counsel to United Steelworkers and AFSCME	Quinn, Connor, Weaver, Davies & Rouco, LLP	Glen M. Connor, Richard P. Rouco	Two North Twentieth Street Suite 930			Birmingham	AL	35203				gconnor@qcwdr.com; rrouco@qcwdr.com
Counsel to United Steelworkers and AFSCME	Quinn, Connor, Weaver, Davies & Rouco, LLP	Nicolas M. Stanojevich	4100 Perimeter Park South			Atlanta	GA	30341				nstanojevich@qcwdr.com
Counsel to Gale Healthcare Solutions, LLC	Richelo Law Group, LLC	Thomas Richelo	8230 Grogans Ferry Road			Atlanta	GA	30350		404-983-1617		trichelo@richelolaw.com
Counsel to the Prepetition Omega Secured Parties, Omega Landlords, and Proposed DIP Lenders (OHI DIP Lender, LLC & OHI Mezz Lender, LLC)	Scroggins & Williamson & Ray, P.C.	Attn Matthew W Levin	4401 Northside Parkway, Suite 230			Atlanta	GA	30327		404-893-3880	404-893-3886	mlevin@swlawfirm.com
Creditors Committee Member / Top 30 Creditor	Shiftmed, LLC	Continental PLLC	c/o Jesus M. Suarez	255 Alhambra Circle, Suite 640		Coral Gables	FL	33134		305-677-2707		Jsuarez@continentalpllc.com
Creditors Committee Member / Top 30 Creditor	Shiftmed, LLC	Susan M. Overton, General Counsel	7925 Jones Branch Drive, Suite 1100			McClean	VA	22102		513-646-7373; 305-677-2707		legal@shiftmed.com; susan.overton@shiftmed.com
Patient Care Ombudsman for Virginia Facilities	State Long-Term Care Ombudsman	Joani Latimer	8004 Franklin Farms Drive			Richmond	VA	23229		804-565-1600		Joani.Latimer@dars.virginia.gov
Patient Care Ombudsman for Mississippi Facilities	State Long-Term Care Ombudsman	Lisa M. Smith	200 S. Lamar Street			Jackson	MS	39201		601-359-4927		LisaM.Smith@mdhs.ms.gov
Patient Care Ombudsman for Pennsylvania Facilities	State Long-Term Care Ombudsman	Margaret Barajas	555 Walnut Street, 5th Floor			Harrisburg	PA	17101		717-783-7096		Mbarajas@pa.gov
Patient Care Ombudsman for Florida Facilities	State Long-Term Care Ombudsman	Terri Cantrell	4040 Esplande Way			Tallahassee	FL	32399		850-414-2331		cantrellt@elderaffairs.org
Patient Care Ombudsman for North Carolina Facilities	State Long-Term Care Ombudsman	Victor Orija	2101 Mail Service Center			Raleigh	NC	27699		919-855-3426		Victor.Orija@dhhs.nc.gov
Creditors Committee Member / Counsel to Healthcare Services Group, Inc.	Stevens & Lee	Robert Lapowsky, Elizabeth Rogers	620 Freedom Business Center, Suite 200			King of Prussia	PA	19406		215-751-2866		Robert.lapowsky@stevenslee.com; Elizabeth.rogers@stevenslee.com
Creditors Committee Member	Theodore Horrobin	Gordon & Partners	c/o Scott Fischer	4114 Northlake Boulevard		Palm Beach Gardens	FL	33410		561-799-5070		SFischer@fortheinjured.com
Counsel to the Official Committee of Unsecured Creditors	Troutman Pepper Hamilton Sanders LLP	Francis J Lawall	3000 Two Logan Square	Eighteenth and Arch Streets		Philadelphia	PA	19103-2799		215-981-4481		francis.lawall@troutman.com

Limited Service List

Description	CreditorName	CreditorNoticeName	Address1	Address2	Address3	City	State	Zip	Country	Phone	Fax	Email
Counsel to the Official Committee of Unsecured Creditors	Troutman Pepper Hamilton Sanders LLP	Joanna J Cline	1313 N. Market Street	Hercules Plaza, Suite 5100	PO Box 1709	Wilmington	DE	19899-1709		302-777-6500		joanna.cline@troutman.com
Counsel to the Official Committee of Unsecured Creditors	Troutman Pepper Hamilton Sanders LLP	Matthew R Brooks, Deborah Kovsky-Apap	875 Third Avenue			New York	NY	10022		212-704-6000		matthew.brooks@troutman.com; deborah.kovsky@troutman.com
Counsel to the Official Committee of Unsecured Creditors	Troutman Pepper Hamilton Sanders LLP	Pierce E. Rigney	600 Peachtree Street, NE, Suite 3000			Atlanta	GA	30308		404-885-3901		perce.rigney@troutman.com
Creditors Committee Member / Top 30 Creditor	Twin Med LLC	David Klarner	11333 Greenstone Avenue			Santa Fe Springs	CA	90670		323-582-9900		dklarner@twinmed.com
Creditors Committee Member / Top 30 Creditor	Twin Med LLC		PO Box 847340			Los Angeles	CA	90084-7340		323-826-2230		payments@twinmed.com
Counsel to the United States of America	U.S. Department of Justice, Civil Division	Louisa A. Soulard	1100 L Street, N.W., Room 7526			Washington	DC	20005		202-514-9038	202-514-9163	louisa.soulard@usdoj.gov
Counsel to the United States of America	U.S. Department of Justice, Civil Division	Louisa A. Soulard	P.O. Box 875	Ben Franklin Station		Washington	DC	20044-0875		202-514-9038	202-514-9163	louisa.soulard@usdoj.gov
Securities & Exchange Commission	U.S. Securities & Exchange Commission	Office of Reorganization	950 East Paces Ferry Road NE, Suite 900			Atlanta	GA	30326-1382				
Counsel to Lakeview SNF Operations LLC, Palm Springs SNF Operations LLC, Franco SNF Operations LLC, Lake Parker SNF Operations LLC, and Vero Beach Operations, LLC	UB Greensfelder LLP	Jennifer Snyder Heis	312 Walnut Street, Suite 1400			Cincinnati	OH	45202-4029		513-698-5058	513-698-5059	jheis@ubglaw.com
United States Attorney for the Northern District of Georgia	United States Attorney Northern District of Georgia		600 Richard B Russell Bldg	75 Ted Turner Drive, SW		Atlanta	GA	30303-3309		404-581-6800	404-581-6181	
Counsel to the Internal Revenue Service	United States Attorney's Office	Vivieon Kelly Jones, Assistant US Attorney	75 Ted Turner Drive SW, Suite 600			Atlanta	GA	30303		404-581-6312	4004-581-6181	vivieon.jones@usdoj.gov
Co-counsel to Davies Claims Solutions, LLC	Updike, Kelly & Spellacy, P.C.	Kevin J. McEleney	225 Asylum Street, 20th Floor			Hartford	CT	06103		860-548-2622		kmceleney@uks.com
Counsel to the Debtors' Prepetition ABL Lender (MidCap Funding IV Trust)	Vedder Price PC	Attn Kathryn L Stevens	222 North LaSalle Street, Suite 2600			Chicago	IL	60601		312-609 7803		kstevens@vedderprice.com
State Attorney General	Virginia Attorney General	Attn Bankruptcy Department	202 North Ninth St			Richmond	VA	23219		804-786-2071	804-786-1991	maloag@oag.state.va.us
Counsel to Superior Medical Staffing and Gale Healthcare Solutions, LLC	Walters Levine & DeGrave	Heather A. DeGrave	601 Bayshore Boulevard, Suite 720			Tampa	FL	33606		813-254-7474	813-254-7341	hdegrave@walterslevine.com; jduncan@walterslevine.com
Counsel for Watson Similien Occilien, as Personal Representative of the Estate of Savoir Similien, Deceased and Bergilise Occilien, Savoir Similien's wife	Lamberth, Cifelli, Ellis & Nason, PA	G. Frank Nason, IV	6000 Lake Forrest Drive, NW Suite 435			Atlanta	GA	30328		404-262-7373; 404-495-4468		fnason@lcnlaw.com
Counsel for Mary Ann Iezzoni, as agent-in fact for Angeline Laman	BALLARD SPAHR LLP	Keisha O. Coleman	999 Peachtree Street, Suite 1600			Atlanta	GA	30309		(678) 420-9300		colemank@ballardspahr.com
Counsel for Mary Ann Iezzoni, as agent-in fact for Angeline Laman	BALLARD SPAHR LLP	Nicholas J. Brannick	919 N. Market St., 11th Floor			Wilmington	DE	19801		(302) 252-4465		brannickn@ballardspahr.com
Counsel for Mary Ann Iezzoni, as agent-in fact for Angeline Laman	HOURIGAN, KLUGER & QUINN P.C.	Kathleen Quinn DePillis Ryan M. Molitoris	600 Third Avenue			Kingston	PA	18704-5815		(570) 287-3000		kdepillis@hkqlaw.com; rmlitoris@hkqlaw.com
Counsel for Ana Almonte	Lefkoff, Rubin, Gleason, Russo & Williams, P.C.	Philip L. Rubin	5555 Glenridge Connector	Suite 900		Atlanta	GA	30342				prubin@lrglaw.com
Counsel for Ginger Ormond, as Personal Representative of the Estate of Susan James	Lamberth, Cifelli, Ellis & Nason, PA	G. Frank Nason, IV	6000 Lake Forrest Drive, NW Suite 435			Atlanta	GA	30328		404-262-7373; 404-495-4468		fnason@lcnlaw.com
Counsel for Stephanie Sifrit, as Personal Representative of the Estate of Janet Smith	Taylor English Duma LLP	John K. Rezac	1600 Parkwood Circle, Suite 200			Atlanta	GA	30339				jrezac@taylorenghish.com
Counsel for Estate of Mary Garrett	Quinn Legal, P.A.	Erin M. Rose Quinn, Esq	19321 US Hwy 19 N, Suite 512			Clearwater	FL	33764				eservice@quinnlegal.com
Counsel for William Burnham	Morgan & Morgan Atlanta PLLC	David A. Geiger, Esq.	191 Peachtree Street NE, Suite 4200			Atlanta	GA	30303		470-386-650		dgeiger@forthepeople.com
Counsel for William Burnham	Latham, Luna, Eden & Beaudine, LLP	Justin M. Luna, Esq.	201 S. Orange Ave., Suite 1400			Orlando	FL	32801		(407) 481-5800		jluna@lathamluna.com; bknotice1@lathamluna.com
Counsel for the Michigan Department of Treasury	Moe Freedman	Assistant Attorney General	Cadillac Place Building	3030 W. Grand Blvd. Ste. 10-200		Detroit	MI	48202		(313) 456-0140		FreedmanM1@michigan.gov