

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

In re:

LaVie Care Centers LLC, *et al.*,

Debtors.

Chapter 11

Case No. 24-55507 (PMB)

Jointly Administered

Re: Docket Nos. 273, 316, 356, 385

**RESERVATION OF RIGHTS OF UNITED STEELWORKERS TO DEBTORS’
DISCLOSURE STATEMENT AND RESERVATION OF RIGHTS WITH RESPECT TO
POTENTIALLY ASSUMED COLLECTIVE BARGAINING AGREEMENTS**

United Steel, Paper and Forestry, Rubber, Manufacturing, Energy, Allied Industrial and Service Workers International Union, AFL-CIO-CLC, (the “USW”), on behalf of itself, Local Union 15198-01, and the bargaining unit members it represents, hereby reserve their right to object to approval of the Plan and disclosure statement contained in the *Debtors’ Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* [Docket No. 461] (the disclosure statement portion thereof (the “Disclosure Statement”) and the Chapter 11 plan portion thereof, (the “Plan”) and *Notice of Filing of Plan Supplement with Respect to the Debtors’ Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of reorganization* [Docket No. 593] (the Plan Supplement).

BACKGROUND

1. The USW is a party to a collective bargaining agreement (“CBA”) with Starkville Manor Healthcare, LLC, d/b/a Starkville Manor Health Care and Rehabilitation Center (Starkville Manor). The Starkville Manor debtor case number is 24-55766. Starkville Manor is a subsidiary of Centennial Healthcare Holdings, which is a subsidiary of Centennial Healthcare Properties, LLC, which is a subsidiary of the Debtor. Doc. 17, pp. 46-47.

2. The CBA between USW and Starkville Manor is effective July 1, 2023 and June 30,



2026. It was therefore in effect on the date the petitions in this case were filed.

3. The Debtors' *Debtors' Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* states that the Reorganized Debtors intend to assume the collective bargaining agreement. [Docket No. 461, p. 77]. The intent has been confirmed by representatives of the Debtors, who have met and conferred productively through the course of these cases. The Plan Supplement, however, contains a list of assumed contracts which does not include the USW CBA [Docket No. 593], and no proposed confirmation order has yet been filed. Based upon the provisions of the Plan, including the promise to assume the CBA, and the representation of Debtors' representatives, it is the understanding of USW that assumption of the CBA remains the case and will be included in the confirmation order proposed to be entered at the November 14, 2024 hearing, and accordingly USW supports the Plan, because it provides for assumption of the CBAs and should allow for the continued and successful operation of the USW represented facility for the residents who rely upon them; however, USW reserves the right to appear on November 14 to object to the Plan if the CBA is not assumed as part of the confirmation order to be entered that day.

Dated: November 4, 2024

Respectfully submitted,

/s/ Nicolas M. Stanojevich

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the above and foregoing was filed with the Clerk of the Bankruptcy Court via the CM/ECF system on this 4th day of November, 2024, and that a duplicate copy was sent via the CM/ECF system to all persons registered on the ECF system in this case.

/s/ Nicolas M. Stanojevich
Nicolas M. Stanojevich