



**IT IS ORDERED as set forth below:**

**Date: February 11, 2025**

*Paul Baisier*

**Paul Baisier  
U.S. Bankruptcy Court Judge**

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

In re:	)	Chapter 11
LAVIE CARE CENTERS, LLC, <i>et al.</i> ,	)	Case No. 24-55507 (PMB)
Debtors. <sup>1</sup>	)	(Jointly Administered)
LAVIE CARE CENTERS, LLC and BRANDON FACILITY OPERATIONS, LLC,	)	Adv. Proc. No. 25-05007 (PMB)
Plaintiffs,	)	<b>Related to Adv. Docket Nos. 1, 2, 3, 4</b>
v.	)	
CREA BRANDON-C LLC and BRANDON HEALTH OPCO, LLC,	)	
Defendants.	)	

<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.veritaglobal.net/LaVie>. The location of LaVie Care Centers, LLC’s corporate headquarters and the Debtors’ service address is 1040 Crown Pointe Parkway, Suite 600, A



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## **STIPULATION AND AGREED ORDER**

This Stipulation and Agreed Order (this “Order” or this “Stipulation”) is entered into by and among (a) LaVie Care Centers, LLC (“LaVie”) and Brandon Facility Operations, LLC (“Brandon” and, together with LaVie, the “Debtor-Plaintiffs”) and (b) CREA Brandon-C LLC and Brandon Health OpCo, LLC (together, the “Brandon Entities” and together with the Debtor-Plaintiffs, the “Parties”) regarding the above-captioned adversary proceeding (the “Adversary Proceeding”). In support hereof, the Parties hereby stipulate as follows:

### **RECITALS**

**WHEREAS**, on January 6, 2025, the Debtor-Plaintiffs filed (i) the *Complaint* [Adv. Docket No. 1] (the “Complaint”), commencing the Adversary Proceeding; (ii) the *Debtor-Plaintiffs’ Motion for Entry of Order Extending Automatic Stay and/or Preliminarily Enjoining Claims and Causes of Action Against Non-Debtor Defendants* [Adv. Docket No. 2] (the “Motion”), seeking entry of an order extending the automatic stay and preliminarily enjoining the claims and causes of action asserted against Pourlessoins, LLC d/b/a Synergy Healthcare Services and Jared Elliott (together, the “Non-Debtor Defendants”) in that certain lawsuit pending in the Circuit Court for the Ninth Judicial Circuit in and for Orange County, Florida Business Court filed by the Brandon Entities captioned *CREA Brandon-C LLC and Brandon Health OpCo, LLC v. Pourlessoins, LLC, d/b/a Synergy Healthcare Services and Jared Elliott*, No. 24-CA-007910-O (the “2024 Brandon Action”); (iii) the *Brief in Support of Debtors’ Emergency Motion for Entry of Order Extending Automatic Stay and/or Preliminarily Enjoining Claims and Causes of Action Against Non-Debtor Defendants* [Adv. Docket No. 3]; and (iv) the *Declaration of Sydney Reitzel in Support of Debtor-Plaintiffs’ Emergency Motion for Entry of Order Extending Automatic Stay and/or Preliminarily Enjoining Claims and Causes of Action Against Non-Debtor Defendants* [Adv. Docket No. 4];

**WHEREAS**, on January 16, 2025, restructuring counsel to the Brandon Entities requested an extension of the Brandon Entities' deadlines to respond to the Motion and to the Complaint from January 21, 2025 and February 6, 2025, respectively, until February 24, 2025;

**WHEREAS**, on January 17, 2025, the Debtor-Plaintiffs agreed to the Brandon Entities' requested extension, reserving all rights in connection with the Adversary Proceeding and the 2024 Brandon Action; and

**WHEREAS**, the Non-Debtor Defendants and the Brandon Entities have agreed via stipulation filed in the 2024 Brandon Action on January 22, 2025 (the "2024 Brandon Action Stipulation") to hold the 2024 Brandon Action in abeyance until the Adversary Proceeding is resolved or an order is entered by the Bankruptcy Court (or the Parties reach an agreement) providing that the 2024 Brandon Action can proceed;

**STIPULATION AND AGREED ORDER**

1. This Stipulation shall have no force or effect unless and until approved by the Bankruptcy Court.

2. As reflected in the 2024 Brandon Action Stipulation, the 2024 Brandon Action shall be held in abeyance until the Adversary Proceeding is resolved by Bankruptcy Court order or agreement between the Parties.

3. The Brandon Entities shall have until February 24, 2025 at 4:00 p.m. (prevailing Eastern Time) to respond to the relief requested in the Motion and the Complaint.

4. Nothing herein shall prejudice, waive, or release the rights, claims, counterclaims, objections, or defenses of the Debtor-Plaintiffs or the Brandon Entities with respect to the Adversary Proceeding or the 2024 Brandon Action.

5. Each of the Parties shall bear its own attorneys' fees and costs of suit incurred in connection with the drafting and negotiation of this Order.

6. The Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation and/or interpretation of this Order.

END OF ORDER

**STIPULATED AND AGREED TO:**

/s/ Daniel M. Simon

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/s/ Elizabeth Green

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- and -

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