



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. ¹)	(Jointly Administered)
LAVIE CARE CENTERS, LLC and BRANDON)	Adv. Proc. No. 25-05007 (PMB)
FACILITY OPERATIONS, LLC,)	Related to Adv. Docket Nos. 1, 2, 3, 4
Plaintiffs,)	
v.)	
CREA BRANDON-C LLC and BRANDON)	
HEALTH OPCO, LLC,)	
Defendants.)	

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.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, Atlanta, GA 30338.



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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

Daniel M. Simon (Georgia Bar No. 690075)
MCDERMOTT WILL & EMERY LLP
1180 Peachtree Street NE, Suite 3350
Atlanta, Georgia 30309
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/s/ Elizabeth Green

Elizabeth Green (*pro hac vice* pending)
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200 S. Orange Ave., Suite 2300
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Telephone: (407) 649-4036
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Counsel for the Brandon Entities

- and -

Emily C. Keil (*admitted pro hac vice*)
Catherine Lee (*admitted pro hac vice*)
MCDERMOTT WILL & EMERY LLP
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Counsel for the Debtors and Debtors-in-Possession

Distribution List

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Brandon Health OpCo, LLC
701 Victoria Street
Brandon, FL 33510

LaVie Care Centers, LLC,
 Plaintiff
 CREA Brandon-C LLC,
 Defendant

Adv. Proc. No. 25-05007-pmb

CERTIFICATE OF NOTICE

District/off: 113E-9

User: bncadmin

Page 1 of 2

Date Rcvd: Feb 12, 2025

Form ID: pdf603

Total Noticed: 10

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.
^	Addresses marked '^' were sent via mandatory electronic bankruptcy noticing pursuant to Fed. R. Bank. P. 9036.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Feb 14, 2025:

Recip ID	Recipient Name and Address
+	Brandon Facility Operations, LLC, 701 Victoria Street, Brandon, FL 33510-4100
+	Brandon Health OpCo, LLC, 701 Victoria Street, Brandon, FL 33510-4100
+	Daniel M. Simon, McDermott Will & Emery LLP, 1180 Peachtree Street NE, Suite 3350, Atlanta, GA 30309-7516
+	Deborah Kovsky-Apap Troutman Pepper Hamilton Sande, 875 Third Avenue, New York, NY 10022-6225
+	Elizabeth Green, BAKERHOSTETLER LLP, 200 S. Orange Ave., Suite 2300, Orlando, FL 32801-3432
+	Francis J. Lawall Troutman Pepper Hamilton Sanders, 3000 Two Logan Square Eighteenth and Arc, Philadelphia, PA 19103
+	Jonathan S. Adams, Office of the United States Trustee, 362 Richard Russell Federal Building, 75 Ted Turner Drive, SW, Atlanta, GA 30303-3315
+	Kurtzman Carson Consultants LLC, 222 N. Pacific Coast Highway, 3rd Floor, El Segundo, CA 90245-5648

TOTAL: 8

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
ust	+ Email/Text: ustpreion21.at.ecf@usdoj.gov	Feb 12 2025 20:20:00	Office of the United States Trustee, 362 Richard Russell Building, 75 Ted Turner Drive, SW, Atlanta, GA 30303-3315
	^ MEBN	Feb 12 2025 20:13:15	LaVie Care Centers, LLC, c/o Ankura Consulting Group, LLC, Attn: M. Benjamin Jones, 485 Lexington Avenue, 10th Floor, New York, NY 10017-2619

TOTAL: 2

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
		Emily C. Keil, McDermott Will & Emery LLP, 444 West Lake Street, Suite 4000 Chicago
		Emily C. Keil, McDermott Will & Emery LLP, 444 West Lake Street, Suite 4000 Chicago
*+		Brandon Facility Operations, LLC, 701 Victoria Street, Brandon, FL 33510-4100
*+		Brandon Health OpCo, LLC, 701 Victoria Street, Brandon, FL 33510-4100
*+		Daniel M. Simon, McDermott Will & Emery LLP, 1180 Peachtree Street NE, Suite 3350, Atlanta, GA 30309-7516
*+		Deborah Kovsky-Apap Troutman Pepper Hamilton Sande, 875 Third Avenue, New York, NY 10022-6225
*+		Elizabeth Green, BAKERHOSTETLER LLP, 200 S. Orange Ave., Suite 2300, Orlando, FL 32801-3432
*		Francis J. Lawall, Troutman Pepper Hamilton Sanders LLP, 3000 Two Logan Square Eighteenth and Arc, Philadelphia, PA 19103
*+		Jonathan S. Adams, Office of the United States Trustee, 362 Richard Russell Federal Building, 75 Ted Turner Drive, SW, Atlanta, GA 30303-3315
*+		Kurtzman Carson Consultants LLC, 222 N. Pacific Coast Highway, 3rd Floor, El Segundo, CA 90245-5648
*+		LaVie Care Centers, LLC, c/o Ankura Consulting Group, LLC, Attn: M. Benjamin Jones, 485 Lexington Avenue, 10th Floor, New York, NY 10017-2619

TOTAL: 2 Undeliverable, 9 Duplicate, 0 Out of date forwarding address

District/off: 113E-9
Date Rcvd: Feb 12, 2025

User: bncadmin
Form ID: pdf603

Page 2 of 2
Total Noticed: 10

NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Feb 14, 2025

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on February 12, 2025 at the address(es) listed below:

Name	Email Address
Daniel M. Simon	on behalf of Plaintiff Brandon Facility Operations LLC dmsimon@mwe.com, dnorthrop@mwe.com;ekeil@mwe.com
Daniel M. Simon	on behalf of Plaintiff LaVie Care Centers LLC dmsimon@mwe.com, dnorthrop@mwe.com;ekeil@mwe.com
Pierce Rigney	on behalf of Interested Party Official Committee of Unsecured Creditors pierce.rigney@troutman.com

TOTAL: 3