

IN THE UNITED STATES BANKRUPTCY COURT  
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)
	)	)	Related to Docket No. 265

**DECLARATION OF ORDINARY COURSE PROFESSIONAL**

I, Francis John Driscoll, Jr., pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney with the Law Office of Frank J. Driscoll, Jr., PLLC [THE FIRM] (the "Firm"), which maintains offices at 4669 South Boulevard, Suite 107, Virginia Beach, Virginia 23452.

2. This Declaration is submitted in connection with an order of the United States Bankruptcy Court for the Northern District of Georgia, Atlanta Division, entered on July 22, 2024 [Docket No. 265], authorizing the above-captioned debtors and debtors-in-possession (collectively, the "Debtors") to employ and compensate certain professionals in the ordinary course of business during the pendency of the Debtors' chapter 11 cases (collectively, the "Chapter 11 Cases").

3. The Debtors have requested that the Firm provide legal services for **Windsor Facility Operations, LLC trading as Consulate Healthcare of Windsor** in Petitioning the

<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, Atlanta, GA 30338.



Circuit Court for the County of Isle of Wight, or other suitable court of competent jurisdiction to appoint a Guardian and/or Conservator for a resident Fred Drury of Consulate Healthcare of Windsor, and the Firm has agreed to provide such services.

4. The Firm is a legal services firm.

5. The Firm has provided services to the Debtors prior to the filing of the Chapter 11 Cases on June 2, 2024, but not for the matter and services referenced in paragraph 3.

6. The Firm's current customary rates, for the legal service provided as set forth herein, are:

Attorney \$ 350.00 per hour

Paralegal \$ 125.00 per hour.

7. The Firm may have performed services in the past, may currently perform services, and may perform services in the future in matters unrelated to the Debtors or the Chapter 11 Cases, for persons that are parties-in-interest in the Debtors' Chapter 11 Cases. To the best of my knowledge, the Firm does not perform services for any such person in connection with the Chapter 11 Cases, or have any relationship with any such person, its attorneys, or its accountants that would be adverse to the Debtors or their estates.

8. The Law Office of Frank J. Driscoll, Jr., PLLC, is a single member limited liability company, and I, the sole member and manager of the Firm, insofar as I have been able to ascertain, does not hold, or represent any interest adverse to, the Debtors or their estates with respect to the matter(s) upon which the Firm is to be employed.

9. Neither I nor anyone else employed by the Firm has agreed to share or will share any portion of the compensation to be received from the Debtors with any other person other than the principals and regular employees of the Firm, as permitted by 11 U.S.C. § 504(b).

10. On information and belief the Debtors do not owe the Firm a retainer for prepetition services. The Firm holds a retainer of \$1,500.00 for another unrelated guardianship matter for another related entity of the Debtor that has been earned and that is applicable to postpetition services.

11. The Firm conducted inquiries regarding its retention by any creditors of the Debtors, and is unaware of any such retention of any creditors of the Debtors, the conclusion of that inquiry, or at any time during the period of its employment of the Debtor or any related entity, if the Firm should discover any facts bearing on the matters described herein, the Firm will supplement the information contained in this Declaration.

I declare under penalty of perjury that, to the best of my knowledge and belief after reasonable inquiry, the foregoing is true and correct.

Executed on this 28<sup>th</sup> day of March, 2025.



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Frank J. Driscoll, Jr., Esq. sole member and manager of the Law Office of Frank J. Driscoll, Jr., PLLC