

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

In re:)	
)	Chapter 11
LAVIE CARE CENTERS, LLC, <i>et al.</i> , ¹)	Case No. 24-55507 (PMB)
)	
Debtors.)	(Jointly Administered)
)	
)	Related to Docket No. 896

**NOTICE OF TRANSFER OF OPERATIONS AND RELATED ASSETS
OF HARTS HARBOR HEALTH CARE CENTER TO NEW OPERATOR
AND OBJECTION DEADLINES AND HEARING RELATED THERETO**

PLEASE TAKE NOTICE that, on April 8, 2025, LaVie Care Centers, LLC and certain of their affiliates and subsidiaries, as debtors and debtors-in-possession in the above-captioned chapter 11 cases (collectively, the “Debtors”) filed the *Debtors’ Motion for Entry of Order (I) Authorizing Transfer of Operations and Related Assets of Harts Harbor Health Care Center Free and Clear of All Liens, Claims, Encumbrances, and Interests; (II) Authorizing Assumption and Assignment of Executory Contracts; (III) Authorizing Rejection of the Harts Harbor Lease and Related Subleases; (IV) Approving Form of Operations Transfer Agreement; and (V) Granting Related Relief* [Docket No. 896] (the “Motion”),² seeking authority to transfer the assets and operations (the “Transferred Assets”) of 11565 Harts Road Operations, LLC d/b/a Harts Harbor Health Care Center located at located at 11565 Harts Road, Jacksonville, Florida 32218 (the “Facility”) to 11565 Harts Road Opco LLC (the “New Operator”).

PLEASE TAKE FURTHER NOTICE that the sale and transfer of the Transferred Assets to New Operator will be free and clear of all liens, claims, encumbrances, and other interests, and free and clear of any successor liability or similar claims or remedies of any kind.

PLEASE TAKE FURTHER NOTICE that the Debtors will seek approval of the Transactions at a hearing scheduled to commence on **April 24, 2025, at 9:30 a.m., prevailing Eastern Time** (the “Hearing”) before the Honorable Paul M. Baisier at the **United States Bankruptcy Court for the Northern District of Georgia, 75 Ted Turner Dr. SW, Courtroom 1202, Atlanta, Georgia 30303**, which may be attended in person or virtually via the Court’s Virtual Hearing Room. You may join the Virtual Hearing Room through the “Dial-in and Virtual

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.

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.



Bankruptcy Hearing Information” link at the top of the homepage of the Court’s website, www.ganb.uscourts.gov, or the Virtual Hearing Room link on Judge Baisier’s webpage, which can be found at <https://www.ganb.uscourts.gov/content/honorable-paul-m-baisier>. Please also review the “Hearing Information” tab on Judge Baisier’s webpage for further information about the hearings. You should be prepared to appear at the hearings via video, but you may leave your camera in the off position until the Court instructs otherwise. Unrepresented persons who do not have video capability may use the telephone dial-in information on Judge Baisier’s webpage.

PLEASE TAKE FURTHER NOTICE that objections to consummation or approval of the Transactions must (a) be in writing; (b) conform to the applicable provisions of the Bankruptcy Rules and the Local Rules; (c) state with particularity the legal and factual bases for the objection and the specific grounds therefor; and (d) be filed with the Court and served so as to be **actually received on or before April 21, 2025, at 4:00 p.m., prevailing Eastern Time**, by the following parties: (i) the Debtors, LaVie Care Centers, LLC, c/o Ankura Consulting Group, LLC, 485 Lexington Avenue, 10th Floor, New York, NY 10017 (Attn: M. Benjamin Jones) (ben.jones@ankura.com); (ii) counsel to the Debtors, McDermott Will & Emery LLP, 1180 Peachtree St. NE, Suite 3350, Atlanta, GA 30309, Attn: Daniel M. Simon (dsimon@mwe.com) and 444 W. Lake Street, Suite 4000, Chicago, IL 60606, Attn: Emily C. Keil (ekeil@mwe.com); (iii) the Office of the United States Trustee for Region 21, 75 Ted Turner Drive, S.W., Room 362, Atlanta, GA 30303, Attn: Jonathan S. Adams (jonathan.s.adams@usdoj.gov); (iv) counsel to the Committee, Troutman Pepper Hamilton Sanders LLP, 600 Peachtree St. NE, Suite 3000, Atlanta, GA 30308 (Attn: Pierce E. Rigney) (pierce.rigney@troutman.com) and 3000 Two Logan Square, Eighteenth and Arch Street, Philadelphia, PA 19103-2799 (Attn: Francis J. Lawall) (francis.lawall@troutman.com) and 875 Third Avenue New York, NY 10022 (Attn: Deborah Kovsky-Apap) (Deborah.kovsky@troutman.com); (v) counsel to the Omega Parties, Goodwin Procter LLP, The New York Times Building, 620 Eighth Avenue, New York, NY 10018 (Attn: Liza L. Burton and Robert Lemons) (lburton@goodwinlaw.com and rlemons@goodwinlaw.com) and Ferguson Braswell Fraser Kubasta PC, 2500 Dallas Parkway, Suite 600, Plano, TX 75093 (Attn: Leighton Aiken) (laiken@fbfk.law); (vi) counsel to the Plan Sponsor, DLA Piper LLP (US) 1900 N. Pearl St, Suite 2200 Dallas, TX 75201 (Attn: James Muenker) (James.Muenker@us.dlapiper.com); and counsel to the New Operator, Bradley Arant Boult Cummings LLP (Attn: T. Parker Griffin, Jr. and James B. Bailey) (pgriffin@bradley.com and jbailey@bradley.com).

Copies of the Motion and all related exhibits, and any other filings in the Debtors’ bankruptcy cases are available for free on the website of the Debtors’ notice agent, Verita Global, at <https://veritaglobal.net/lavie/>.

CONSEQUENCES OF FAILING TO TIMELY MAKE AN OBJECTION

ANY PARTY OR ENTITY WHO FAILS TO TIMELY MAKE AN OBJECTION TO THE TRANSACTIONS ON OR BEFORE THE OBJECTION DEADLINE SHALL BE DEEMED TO HAVE CONSENTED TO THE SALE AND TRANSFER OF THE TRANSFERRED ASSETS TO THE NEW OPERATOR AND SHALL BE FOREVER BARRED FROM ASSERTING ANY OBJECTION TO THE TRANSACTIONS, INCLUDING WITH RESPECT TO THE TRANSFER OF THE TRANSFERRED ASSETS

TO THE NEW OPERATOR FREE AND CLEAR OF SUCCESSOR LIABILITY OF ANY KIND AND ALL LIENS, CLAIMS, ENCUMBRANCES, AND OTHER INTERESTS THAT SUCH PARTY OR ENTITY MAY HAVE AGAINST THE DEBTORS OR THE TRANSFERRED ASSETS.

Dated: April 11, 2025
Atlanta, Georgia

MCDERMOTT WILL & EMERY LLP

/s/ Daniel M. Simon

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- and -

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