

LLC and Brandon Health OpCo, LLC v. Brandon Facility Operations, LLC and LaVie Care Centers, LLC, No. 2023-CA-12242-O (the “2023 Brandon Action”) and (ii) that certain lawsuit pending in the Florida State Court, captioned *CREA Brandon-C LLC and Brandon Health OpCo, LLC v. Pourlessoins, LLC d/b/a Synergy Healthcare Services and Jared Elliot*, No. 2024-CA-007910-O (the “2024 Brandon Action”).

PLEASE TAKE FURTHER NOTICE that, as a result of the Dismissal Stipulations, on April 14, 2025, the Florida State Court entered a *Final Order of Dismissal Without Prejudice and Direction to Clerk to Close Case* (each, a “Dismissal Order” and, together, the “Dismissal Orders”) in both the 2023 Brandon Action and the 2024 Brandon Action. As a result of the Dismissal Orders, copies of which are attached hereto as **Exhibits B-1 and B-2**, the 2023 Brandon Action and the 2024 Brandon Action have been dismissed by the Florida State Court.

PLEASE TAKE FURTHER NOTICE that, as a result of the dismissal of the 2023 Brandon Action and the 2024 Brandon Action, further relief in the above-captioned adversary proceeding is no longer necessary. Accordingly, LaVie Care Centers, LLC and Brandon Facility Operations, LLC (together, the “Debtor-Plaintiffs”) and the Brandon Entities hereby jointly file this *Joint Notice of Dismissal of Adversary Proceeding No. 25-05007*, voluntarily dismissing the above-captioned adversary proceeding.

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/s/ Elizabeth Green

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Counsel to the Brandon Entities

CERTIFICATE OF SERVICE

I hereby certify that on this date a true and correct copy of the foregoing notice was served by the Court's CM/ECF system on all counsel of record registered in the above-captioned adversary proceeding through CM/ECF, including counsel to Recovery Corp. The Debtors' claims and noticing agent will be filing a supplemental certificate of service on the docket to reflect any additional service of the foregoing notice.

Dated: April 16, 2025
Atlanta, Georgia

MCDERMOTT WILL & EMERY LLP

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Counsel for the Debtors and Debtors-in-Possession

EXHIBIT A-1

**Dismissal Stipulation
2023 Brandon Action**

IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT,
IN AND FOR ORANGE COUNTY, FLORIDA
BUSINESS COURT

CREA BRANDON-C LLC and
BRANDON HEALTH OPCO, LLC,

Plaintiffs,

vs.

CASE NO. 2023-CA-12242-O
DIVISION 43 – BUSINESS
COURT

BRANDON FACILITY OPERATIONS, LLC;
LAVIE CARE CENTERS, LLC;
POURLESSOINS, LLC, d/b/a SYNERGY
HEALTHCARE SERVICES; LIDENSKAB, LLC,
d/b/a RAYDIANT HEALTH CARE; and
JARED ELLIOTT,

Defendants.

**STIPULATION FOR
ENTRY OF DISMISSAL WITHOUT PREJUDICE**

The Plaintiffs, CREA Brandon-C LLC and Brandon Health Opco, LLC, and Defendants, Brandon Facility Operations, LLC and LaVie Care Centers, LLC, through their counsel, stipulate to the dismissal of this action without prejudice, with all parties bearing their own legal fees and costs.¹

¹ Although Plaintiffs filed a motion for leave to amend the operative complaint to add Pourlessoins, LLC, d/b/a Synergy Healthcare Services; Lidenskab, LLC, d/b/a Raydiant Health Care; and Jared Elliott, as additional defendants, a suggestion of bankruptcy was filed in the action prior to any ruling on the motion to add these additional defendants.

By: /s/ Michael J. Bittman

MICHAEL J. BITTMAN

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Mike.Bittman@nelsonmullins.com

*Attorneys for Plaintiffs, CREA Brandon-C LLC
and Brandon Health Opco, LLC*

By: /s/ Asra A. Chatham

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*Attorney for Defendants, Brandon Facility
Operations, LLC and LaVie Care Centers, LLC.*

IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT,
IN AND FOR ORANGE COUNTY, FLORIDA
BUSINESS COURT

CREA BRANDON-C LLC and
BRANDON HEALTH OPCO, LLC,

Plaintiffs,

vs.

CASE NO. 2023-CA-12242-O
DIVISION 43 – BUSINESS
COURT

BRANDON FACILITY OPERATIONS, LLC;
LAVIE CARE CENTERS, LLC;
POURLESSOINS, LLC, d/b/a SYNERGY
HEALTHCARE SERVICES; LIDENSKAB, LLC,
d/b/a RAYDIANT HEALTH CARE; and
JARED ELLIOTT,

Defendants.

**FINAL ORDER OF DISMISSAL WITHOUT PREJUDICE
AND DIRECTION TO CLERK TO CLOSE CASE**

Upon consideration of the Stipulation for Entry of Dismissal without Prejudice, and otherwise being fully advised in the premises, the Court

ORDERS AND ADJUDGES that the above-captioned action is hereby dismissed without prejudice, with each party to bear their own fees and costs. The Court directs the Clerk to close this case.

DONE AND ORDERED in chambers at Orlando, Orange County, Florida, this ____ day of _____, 2025.

CHAD K. ALVARO
Circuit Judge

Copies furnished to (All on E-Portal):

Counsel for Plaintiffs:

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EXHIBIT A-2

**Dismissal Stipulation
2024 Brandon Action**

IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT,
IN AND FOR ORANGE COUNTY, FLORIDA
BUSINESS COURT

CREA BRANDON-C LLC and
BRANDON HEALTH OPCO, LLC,

Plaintiffs,

vs.

CASE NO. 2024-CA-7910-O
DIVISION 43 – BUSINESS
COURT

POURLESOINS, LLC, d/b/a SYNERGY
HEALTHCARE SERVICES; and
JARED ELLIOTT,

Defendants.

**STIPULATION FOR
ENTRY OF DISMISSAL WITHOUT PREJUDICE**

The Plaintiffs, CREA Brandon-C LLC and Brandon Health Opco, LLC, and Defendants, Pourlessoins, LLC, d/b/a Synergy Healthcare Services, and Jared Elliott, by their undersigned counsel, stipulate to the dismissal of this action without prejudice, with all parties bearing their own legal fees and costs.

By: /s/ Michael J. Bittman

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By: /s/ Anthony A. Cifuentes

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*Attorneys for Defendants, Pourlessoins, LLC,
d/b/a Synergy Healthcare Services, and Jared Elliott*

IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT,
IN AND FOR ORANGE COUNTY, FLORIDA
BUSINESS COURT

CREA BRANDON-C LLC and
BRANDON HEALTH OPCO, LLC,

Plaintiffs,

vs.

CASE NO. 2024-CA-7910-O
DIVISION 43 – BUSINESS
COURT

POURLESSOINS, LLC, d/b/a SYNERGY
HEALTHCARE SERVICES, and
JARED ELLIOTT,

Defendants.

**FINAL ORDER OF DISMISSAL WITHOUT PREJUDICE
AND DIRECTION TO CLERK TO CLOSE CASE**

Upon consideration of the Stipulation for Entry of Dismissal without Prejudice, and otherwise being fully advised in the premises, the Court

ORDERS AND ADJUDGES that the above-captioned action is hereby dismissed without prejudice, with all parties to bear their own fees and costs. The Court directs the Clerk to close this case.

DONE AND ORDERED in chambers at Orlando, Orange County, Florida,
this ____ day of _____, 2025.

CHAD K. ALVARO
Circuit Judge

Copies furnished to (All on E-Portal):

Counsel for Plaintiffs:

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EXHIBIT B-1

**Dismissal Order
2023 Brandon Action**

IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT,
IN AND FOR ORANGE COUNTY, FLORIDA
BUSINESS COURT

CREA BRANDON-C LLC and
BRANDON HEALTH OPCO, LLC,

Plaintiffs,

vs.

CASE NO. 2023-CA-12242-O
DIVISION 43 – BUSINESS
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BRANDON FACILITY OPERATIONS, LLC;
LAVIE CARE CENTERS, LLC;
POURLESSOINS, LLC, d/b/a SYNERGY
HEALTHCARE SERVICES; LIDENSKAB, LLC,
d/b/a RAYDIANT HEALTH CARE; and
JARED ELLIOTT,

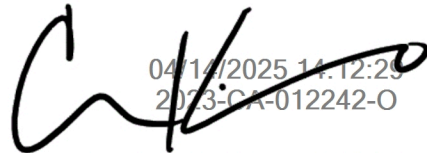
Defendants.

**FINAL ORDER OF DISMISSAL WITHOUT
PREJUDICE AND DIRECTION TO CLERK TO CLOSE CASE**

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DONE AND ORDERED



eSigned by Chad Alvaro 04/14/2025 14:12:29 md4ySTY8

CHAD K. ALVARO
Circuit Judge

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EXHIBIT B-2

**Dismissal Order
2024 Brandon Action**

IN THE CIRCUIT COURT OF THE NINTH JUDICIAL CIRCUIT,
IN AND FOR ORANGE COUNTY, FLORIDA
BUSINESS COURT

CREA BRANDON-C LLC and
BRANDON HEALTH OPCO, LLC,

Plaintiffs,

vs.

CASE NO. 2024-CA-7910-O
DIVISION 43 – BUSINESS
COURT

POURLESSOINS, LLC, d/b/a SYNERGY
HEALTHCARE SERVICES, and
JARED ELLIOTT,

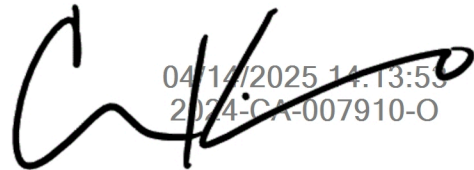
Defendants.

**FINAL ORDER OF DISMISSAL WITHOUT
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ORDERS AND ADJUDGES that the above-captioned action is hereby dismissed without prejudice, with all parties to bear their own fees and costs. The Court directs the Clerk to close this case.

DONE AND ORDERED



04/14/2025 14:13:53
2024-CA-007910-O

eSigned by Chad Alvaro 04/14/2025 14:13:53 42fd9BSW

CHAD K. ALVARO
Circuit Judge

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