

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

In re:

LAVIE CARE CENTERS, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 24-55507 (PMB)

(Jointly Administered)

Re: Docket Nos. 1112, 1113, 1162, 1199

**CERTIFICATION OF COUNSEL SUBMITTING REVISED PROPOSED
ORDER GRANTING AMERIHEALTH CARITAS HEALTH PLAN'S
D/B/A AMERIHEALTH CARITAS PENNSYLVANIA REQUEST FOR
PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM**

The undersigned counsel to AmeriHealth Caritas Health Plan d/b/a AmeriHealth Caritas Pennsylvania (“ACHP”) hereby certifies that:

1. On December 4, 2024, the above-captioned debtors (the “Debtors”) filed the *Notice of Filing of Further Modifications to Debtors’ Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* [D.I. 730] (the “Plan”). The Court entered its order confirming the Plan on December 5, 2024 [D.I. 735].

2. On June 2, 2025, the Debtors filed the *Notice of (I) Entry of Order Confirming Debtors’ Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization and (II) Occurrence of Effective Date* [D.I. 1016] (the “Notice of Effective Date”).

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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Pursuant to the Notice of Effective Date, requests for payment of Administrative Expense Claims (as defined in the Plan) were to be filed by July 1, 2025.

3. On July 1, 2025, *AmeriHealth Caritas Health Plan's d/b/a AmeriHealth Caritas Pennsylvania Request for Payment of Administrative Expense Claim* [D.I. 1112] (the “Request”) was filed with the Court, requesting payment of contingent and unliquidated administrative expense claims.

4. Pursuant to the *Notice of Hearing* [D.I. 1113], the Request was to be heard on August 7, 2025 (the “Hearing”).

5. Prior to the Hearing, ACHP and the Debtors conferred on ACHP's Request and mutually agreed to continue the Hearing on the Request to August 29, 2025. *See Notice of Continued Hearing on AmeriHealth Caritas Health Plan's d/b/a AmeriHealth Cartias Pennsylvania Request for Payment of Administrative Expense Claim* [D.I. 1162].

6. To allow time for additional negotiations regarding the Request, ACHP and the Debtors mutually agreed to again continue the Hearing on the Request to September 30, 2025. *See Amended Notice of Continued Hearing on AmeriHealth Caritas Health Plan's d/b/a AmeriHealth Cartias Pennsylvania Request for Payment of Administrative Expense Claim* [D.I. 1199].

7. The Debtors and ACHP have reached an agreed upon settlement with respect to the Request. Attached hereto as **Exhibit “A”** is a revised proposed order (the “Revised Proposed Order”) documenting the agreed upon settlement that ACHP has confirmed is acceptable to counsel for the Debtors and may be submitted to the Court for entry.

[Remainder of page left intentionally blank]

8. ACHP would respectfully request that the Court sign the Revised Proposed Order and direct that it be docketed.

Dated: September 26, 2025

SAUL EWING LLP

/s/ Steven C. Reingold

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AmeriHealth Caritas Pennsylvania*

EXHIBIT A

Revised Proposed Order

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

In re:

LAVIE CARE CENTERS, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 24-55507 (PMB)

(Jointly Administered)

Re: Docket Nos. 1112, 1113, 1162, 1199

**ORDER GRANTING AMERIHEALTH CARITAS HEALTH PLAN'S
D/B/A AMERIHEALTH CARITAS PENNSYLVANIA REQUEST FOR
PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM**

Upon consideration of the *AmeriHealth Caritas Health Plan's d/b/a AmeriHealth Caritas Pennsylvania Request for Payment of Administrative Expense Claim* [D.I. 1112] (the "Request")², and due and proper notice of the Request having been given; and it appearing that no other or further notice is required; and it appearing that the Court has jurisdiction to consider the request

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 not otherwise defined herein shall have the meaning ascribed to them in the Request.

pursuant to 28 U.S.C. §§ 157 and 1334; and it appearing that venue is proper pursuant 28 U.S.C. §§ 1408 and 1409; and it appearing that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and after due deliberation, and sufficient cause appearing,

HEREBY ORDERED THAT:

1. The Request is GRANTED as set forth herein.
2. ACHP is hereby granted an allowed, liquidated administrative expense claim in the amount of \$27,958.90 pursuant to 11 U.S.C. § 503(b)(1)(A) for unpaid postpetition obligations due and owing under the Agreements (the “Administrative Expense Claim”). The Administrative Expense Claim shall not be subject to any offsets.
3. In furtherance of this resolution, ACHP shall not seek to otherwise recoup from the Debtors any amounts due and owing under the Agreements that arose between June 2, 2024 through June 1, 2025, as such amounts shall be deemed satisfied in full through payment of the Administrative Expense Claim.
4. The Debtors are authorized and directed to pay the full amount of the Administrative Expense Claim within two weeks upon the date of the entry of this order.

[Remainder of page left intentionally blank]

5. This Court shall retain jurisdiction to hear and determine all matters arising from the implementation and interpretation of this order.

AGREED AND APPROVED

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Counsel for Debtors

CERTIFICATE OF SERVICE

I certify that on September 26, 2025, a true and correct copy of the foregoing document was served via the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Georgia on all parties registered to receive electronic notices and on the parties listed in the attached service list via electronic mail.

/s/ Steven C. Reingold
Steven C. Reingold

SERVICE LIST

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