

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)

Related to Docket No. 1108

**CERTIFICATION OF COUNSEL SUBMITTING REVISED PROPOSED ORDER
GRANTING UNITEDHEALTHCARE INSURANCE COMPANY'S MOTION FOR
ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM**

Undersigned counsel to UnitedHealthcare Insurance Company ("United") hereby certifies that:

1. On December 4, 2024, the above-captioned debtors (the "Debtors") filed the *Debtors' Modified Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* [Docket No. 730] (the "Plan"). The Court entered an order confirming the Plan on December 5, 2024 [Docket No 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* [Docket No. 1016] (the "Notice of Effective Date"). 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.

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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3. On June 30, 2025, United's Motion for Allowance and Payment of Administrative Expense Claim [Docket No. 1108] (the "Request") was filed with the Court, requesting payment of its administrative expense claim.

4. Pursuant to the Notice of Hearing [Docket No. 1108], the Request was to be heard on August 4, 2025 (the "Hearing").

5. Prior to the Hearing and in the weeks that followed, United and the Debtors conferred and mutually agreed to continue the Hearing on the Request on multiple occasions to August 7, 2025, August 29, 2025, September 30, 2025, October 20, 2025, and November 20, 2025. *See* Docket Nos. 1111, 1167, 1200, 1228, 1237.

6. The Debtors and United 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 is mutually acceptable to United and the Debtors and may be submitted to the Court for entry.

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

Dated: November 3, 2025

CAIOLA & ROSE, LLC

By: /s/ Elizabeth B. Rose
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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)

Related to Docket No. 1108

**ORDER GRANTING UNITEDHEALTHCARE INSURANCE COMPANY'S MOTION
FOR ALLOWANCE AND PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM**

Upon consideration of the *UnitedHealthcare Insurance Company's Motion for Allowance and Payment of Administrative Expense Claim* [Docket No. 1108] (the "Request"); 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 pursuant to 28

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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,

IT IS HEREBY ORDERED THAT:

1. The Request is GRANTED as set forth herein.
2. United is hereby granted an allowed, liquidated administrative expense claim in the amount of \$75,247.90 pursuant to 11 U.S.C. § 503(b)(1)(A) for unpaid post-petition obligations (the “Administrative Expense Claim”). The Administrative Expense Claim shall not be subject to any offsets.
3. In furtherance of this resolution, United 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.
5. Counsel for United shall serve a copy of this Order on all parties served with the Motion and file a certificate of service within three (3) days from the entry of this Order showing such service.
6. This Court shall retain jurisdiction to hear and determine all matters arising from the implementation and interpretation of this order.

END OF DOCUMENT

AGREED AND APPROVED

CAIOLA & ROSE, LLC <u>/s/ Elizabeth B. Rose</u> Elizabeth B. Rose (Georgia Bar No. 558747) 125 Clairemont Avenue, Suite 240 Decatur, Georgia 30030 Phone: (470) 300-1022 Email: elizabeth@caiolarose.com <i>Counsel for UnitedHealthcare Insurance Company</i>	MCDERMOTT WILL & SCHULTE LLP <u>/s/ Emily C. Keil*</u> <i>*Signed by Elizabeth B. Rose with express written permission.</i> Daniel M. Simon (Georgia Bar No. 690075) 1180 Peachtree St. NE, Suite 3350 Atlanta, Georgia 30309 Telephone: (404) 260-8535 Email: dsimon@mwe.com -and- Emily C. Keil (admitted <i>pro hac vice</i>) 444 West Lake Street, Suite 4000 Chicago, Illinois 60606 Telephone: (312) 372-2000 Email: ekeil@mwe.com <i>Counsel for Debtors</i>
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