

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

In re:

LaVie Care Centers, LLC, et al.,
Debtors.

Chapter 11
Case No. 24-55507-PMB
(Jointly Administered)

**RESPONSE OF SELECTION HEALTHCARE SERVICES LLC d/b/a SELECTION
HEALTHCARE STAFFING TO GUC TRUSTEE'S FIRST OMNIBUS OBJECTION TO
CERTAIN (I) LATE CLAIMS AND (II) DUPLICATE CLAIMS (RE: CLAIM NOS. 95
AND 4676)**

Selection Healthcare Services LLC d/b/a Selection Healthcare Staffing ("Creditor") respectfully submits this Response to the GUC Trustee's First Omnibus Objection to Certain (I) Late Claims and (II) Duplicate Claims (the "Objection") as it relates to Claim Nos. 95 and 4676, and states as follows:

Creditor and Claim 4676. Creditor is a general unsecured creditor of McComb HealthCare, LLC ("Debtor") arising from healthcare staffing services provided to the Debtor. On August 30, 2024, Creditor filed Proof of Claim No. 4676 in the amount of \$51,566.62 for such services (the "Filed Claim").

Claim 95 was not filed by Creditor and is inaccurate. Claim No. 95, listed in the amount of \$28,279.43, appears to reflect a scheduled amount or an earlier, incomplete figure based on the Debtor's records. Creditor does not rely on Claim 95 and does not agree that \$28,279.43 is the correct amount owed.

Claim 4676 is Creditor's controlling claim. Claim 4676 was filed by Creditor, is supported by Creditor's books and records, and accurately reflects the total unpaid balance owed by McComb HealthCare, LLC for staffing services. Creditor intends Claim 4676—not Claim 95—to be its operative proof of claim.

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U.S. BANKRUPTCY COURT
NORTHERN DISTRICT
OF GEORGIA

2025 DEC 10 PM 1:40

VANIA S. ALLEN
CLERK

BY: *[Signature]*
DEPUTY CLERK



Claim 4676 supersedes any scheduled or incomplete claim. Under Bankruptcy Rule 3003(c) and applicable law, a creditor's filed proof of claim supersedes any scheduled claim or earlier incomplete amount. To the extent Claim 95 appears on the claims register, it should be treated as superseded and non-controlling as to Creditor's rights.

Claim 4676 is not a "duplicate" in substance. The Objection characterizes Claim 4676 as a "duplicate" of Claim 95. Creditor respectfully disagrees. Claim 4676 is not a true duplicate of an identical amount; instead, it reflects the correct, complete amount owed, whereas Claim 95 reflects a lower, inaccurate figure. Disallowing Claim 4676 would improperly reduce Creditor's claim to an amount that Creditor has never agreed is correct.

Supporting documentation. Creditor's Filed Claim (Claim 4676) was submitted with supporting documentation, and additional invoices, payroll summaries, and service records can be provided upon request or at any hearing. Creditor is not seeking any double recovery and only seeks allowance of a single general unsecured claim in the correct amount of \$51,566.62.

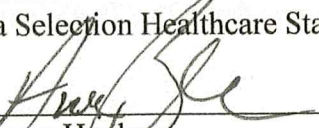
REQUEST FOR RELIEF

WHEREFORE, Creditor respectfully requests that the Court enter an order:

- (a) denying the Objection to the extent it seeks to disallow Claim 4676 as a "duplicate";
- (b) deeming Claim 95 superseded and non-controlling as to Creditor's rights;
- (c) allowing Claim 4676 in full as a general unsecured claim in the amount of \$51,566.62 against McComb HealthCare, LLC; and
- (d) granting such other and further relief as the Court deems just and proper.

Respectfully submitted,

Selection Healthcare Services LLC
d/b/a Selection Healthcare Staffing

By: 
Avery Hughes
Authorized Representative

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Hattiesburg, MS 39402
Email: averyhughes@selectionhealthcare.com
Telephone: 800-269-9124 or 601-549-5289
Date: 12/10/2025

DECLARATION OF AVERY HUGHES

I, Avery Hughes, declare as follows:

I am the authorized representative of Selection Healthcare Services LLC d/b/a Selection Healthcare Staffing, the Creditor identified in this Response. I have personal knowledge of the facts set forth herein except as otherwise indicated, and if called as a witness, I could and would testify competently thereto.

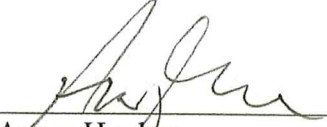
I filed Proof of Claim No. 4676 in the amount of \$51,566.62 against McComb HealthCare, LLC for healthcare staffing services, and I believe that amount is accurate based on Creditor's books and records.

I understand that Claim No. 95 appears on the claims register in the lower amount of \$28,279.43. That amount is not correct and was not intended by me to be Creditor's final claim amount.

The statements set forth in the foregoing Response are true and correct to the best of my knowledge, information, and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 10th 2025 in Hattiesburg, MS.



Avery Hughes
Authorized Representative

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