

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

In re

Chapter 11

LAVIE CARE CENTERS, LLC, *et al.*

Case No. 24-55507-PMB

Debtors.

**NOTICE OF FILING RESPONSE TO THE GUC TRUSTEE'S FIRST
OMNIBUS OBJECTIONS TO CERTAIN (I) LATE
CLAIMS AND (II) DUPLICATE CLAIMS AS TO LINDA CHATMON**

COMES NOW, Trustee LINDA CHATMON as Personal Representative of the Estate of DENNIS STEPHENS SR., by and through undersigned counsel, and files this Notice of Filing her Response to the GUC Trustee's First Omnibus Objections. This response details why the claim should not be disallowed and/or expunged (beyond the insurance proceeds available, see #4 of the Proposed Order Sustaining the GUC Trustee's First Omnibus Objection to Certain (I) Late Claims and (II) Duplicate Claims).

1. On or about June 29, 2022, the underlying Florida Statute Chapter 400 claim was amicably resolved for \$40,000 dollars, and agreement was reached that proceeds would begin funding on or about April 18, 2025 (see settlement agreement, Exhibit "A").

2. On July 31, 2024, counsel received notice from Defendant's counsel, Dias & Associates, P.A., that the Defendant was filing bankruptcy on August 2, 2024. Plaintiff's counsel timely demanded payment from Defendant's counsel as delineated in the settlement agreement.

3. During July 2024, Plaintiff's counsel moved from 499 NW 70th Avenue, Suite 116, Plantation, FL 33317 to its current address at 1625 N. Commerce Parkway, Suite 200, Weston, FL 33326.



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d/b/a CONSULATE HEALTH CARE OF LAKE LAND, and/or other party or entity and any other relief this Court deems just and proper.

Dated this 10th day of December 2025.

/s/ Jack Paris, Esq.
JACK PARIS, ESQ.
Florida Bar No. 984310
THE COCHRAN FIRM SOUTH FLORIDA
Attorney for Plaintiffs
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Weston, Florida 33326
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 10, 2025, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using the CM/ECF System and served by the Court's CM/ECF system on all counsel of record registered in this case through CM/ECF.

/s/ Jack Paris, Esq.
JACK PARIS, ESQ.
Florida Bar No. 984310

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Counsel for the GUC Trust

GENERAL RELEASE

BE IT KNOWN that I, LINDA J. STEPHENS CHATMON, as Personal Representative of the Estate of DENNIS STEPHENS, SR., Releasor, for and in consideration of the sum of FORTY THOUSAND DOLLARS AND 00/100 CENTS (\$40,000.00) or other valuable considerations, *to be made payable April 18, 2025*, do, for myself, and my respective heirs, representatives, executors, administrators and assigns, hereby fully release and forever discharge LAKELAND FACILITY OPERATIONS, LLC d/b/a CONSULATE HEALTH CARE OF LAKELAND, hereinafter "Releasees", from any and all manner of actions, claims for relief and damages, suits, debts, obligations, judgments, and demands whatsoever, in law or in equity, whether known or unknown, direct or indirect, not existing, which Releasor ever had, now has, or which any personal representative, successor, heir or assign of said Releasor, hereafter can, shall or may have against said Releasees, for, upon or by reason of any matter, cause or thing whatsoever, from the beginning of the world to the day of these presents, including, without limitation, all claims or actions arising out or related in any way to the subject matter of: LINDA J. STEPHENS CHATMON, as Personal Representative of the Estate of DENNIS STEPHENS, SR. v. LAKELAND FACILITY OPERATIONS, LLC d/b/a CONSULATE HEALTH CARE OF LAKELAND, filed in the TENTH JUDICIAL CIRCUIT, IN AND FOR POLK COUNTY, STATE OF FLORIDA, CIRCUIT COURT CASE NUMBER 18-CA-003252 including any and all claims for attorneys fees and costs.

It is understood and agreed that this release shall also apply to the Releasees past, present and future employees, managers, operators and parents (direct and indirect), affiliates, subsidiaries, shareholders, members, officers and directors, predecessors and successors in interest and assigns, and all other persons, firms, corporations, or companies with whom any of the former have been, are now or may hereafter be affiliated, any language in this release to the contrary notwithstanding.

The Releasor hereby agrees to indemnify and hold harmless the Releasee from any and all claims and/or liens and/or subrogated interests herein for which these funds are intended to cover.

Releasor warrants and expressly agrees to satisfy any and all existing encumbrances or liens, including but not limited to governmental or third party payor sources such as Medicare, Medicaid or Social Security liens which are in existence, and agree to satisfy any encumbrances or liens which may hereinafter be filed, levied, asserted, or placed upon any proceeds identified with this Release.

Releasor acknowledges and understands that information concerning Releasor, the settlement, and other circumstances are subject to the mandatory reporting requirements of Section 111 of the Medicare, Medicaid & SCHIP Extension Act of 2007 (MMSEA). Releasor agrees that this General Release is final and binding, no matter what act, position, assertion, recovery effort, or enforcement action may be made against Releasor or the settlement.

In consideration of the payment of Ten Dollars and 00/100 (\$10.00) which sum is

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included in the total amount of the settlement as stated above in this document and is not in addition to it, Releasor and Releasee agree that the terms of this agreement are absolutely confidential and shall not be disclosed to anyone else, including any publisher, representative of the media, journal and/or periodical in the absence of a court order, except as may be necessary to effectuate its terms. This agreement is intended to be binding on the Plaintiff/Releasor and his/her agents and representatives. Any disclosure in violation of this section shall be deemed a material breach of this agreement.

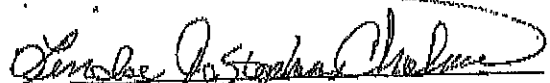
It is further understood and agreed that this release does not, and is not intended to, release or discharge any claim or potential claim against any other person or entity not identified herein, including, but not limited to, any claim or any potential claim against any other nursing home, any surgeon or doctor, or their professional association, nurses, or independent contractors, any therapy company or pharmaceutical company, consultants, or any hospital except those specifically provided herein.

It is further understood and agreed that this settlement is the compromise of disputed claims and that the payment made is not to be construed as an admission of liability on the part of any Releasees, all of whom expressly deny any liability for this action.

It is further understood and agreed that no promise or agreement not herein expressed has been made to Releasor and that this Release contains the entire agreement between the parties to it and that the terms of this Release are contractual and not a mere recital.

Further, the Releasor waives and agrees to hold harmless, Releasee from any and all claims that may exist on behalf of all natural and/or adopted children of DENNIS STEPHENS, SR.

Releasor has had the benefit of counsel and of his/her own attorney; that Releasor fully understands the terms of this Release; and that Releasor is making full and final settlement of all claims of every nature and character against persons hereby released.


LINDA J. STEPHENS CHATMON, as
Personal Representative of the Estate of
DENNIS STEPHENS, SR.

[NOTARY PAGE TO FOLLOW]

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JACKSON BRANCH

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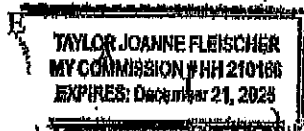
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STATE OF Florida
 COUNTY OF Polk

The foregoing instrument was acknowledged before me by means of ☒ physical presence
 or ☐ online notarization this 29 day of JULY, 2022 by Linda Chatmon
 _____, who is personally known to me or has produced FUD#C355-037-60-946-0
 _____ as identification and who did not (did) take an oath.

S



Taylor Joanne Fleischer
 Notary Public, State of
 (Signature of Notary taking
 Acknowledgment)

Taylor Joanne Fleischer
 Name of Notary Typed,
 Printed or Stamped

My Commission Expires: 12/21/2025

HH210166
 Commission Number

THIS INSTRUMENT PREPARED BY:

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