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

In re	)	Chapter 11
LAVIE CARE CENTERS, LLC, *et al.*[1]	)	Case No. 24-55507-PMB
Debtors.	)	(Jointly Administered)

CERTIFICATION OF COUNSEL REGARDING STIPULATION AND AGREED PROTECTIVE ORDER

Ryniker Consultants, LLC, in its capacity as the trustee (the "GUC Trustee") for the trust (the "GUC Trust") established on behalf of the above-captioned debtors and debtors-in-possession (the "Debtors") pursuant to the *Debtors' Modified Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* [D.I. 730-1] (the "Plan"),[2] hereby certifies as follows:

1. On June 2, 2024 and June 3, 2024 (the "Petition Date"), the Debtors commenced cases (collectively, the "Chapter 11 Cases") by filing petitions for relief under chapter 11 of title 11 of the United States Code.

2. The Plan requires the Debtors to provide the GUC Trustee with access to the Debtors' Books and Records, including those held by third parties, to the extent reasonably necessary for the GUC Trustee to perform his duties under the Plan.

[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.kccllc.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 defined herein are defined in the Plan or the *GUC Trustee's First Post-Effective Date Status Report to Holders of General Unsecured Claims* [D.I. 1218] (the "Initial Status Report"), as applicable.

3. Dias holds Books and Records of the Debtors that are reasonably necessary for the GUC Trustee to reconcile and/or prosecute objections to certain Class 6A and Class 6B Claims.

4. The GUC Trustee and Dias have entered into the stipulated and agreed protective order to, among other things, facilitate and govern the production, review, and handling of the Books and Records to be produced to the GUC Trustee.

5. A proposed form of order approving the Stipulation is attached hereto as **Exhibit A** (the "Proposed Order"). The Stipulation is attached as Exhibit 1 to the Proposed Order. The Debtors have circulated the Proposed Order and Stipulation to Dias, who does not object to its entry.

6. The GUC Trustee respectfully requests that the Court enter and approve the Proposed Order attached hereto as **Exhibit A**.

[Signature Page Follows]

Dated: April 28, 2026

TROUTMAN PEPPER LOCKE LLP

/s/ Tori L. Remington

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-and-

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Counsel to the GUC Trustee

Exhibit A

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

In re	)	Chapter 11
	)	Case No. 24-55507-PMB
LAVIE CARE CENTERS, LLC, *et al.*,[1]	)	
	)	(Jointly Administered)
Reorganized Debtors.	)	

ORDER APPROVING STIPULATED AND AGREED
CONFIDENTIALITY AGREEMENT AND PROTECTIVE ORDER

[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.kccllc.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.

Upon the certification of counsel (the "Certification of Counsel") of the GUC Trustee, filed on April __, 2026 at Docket No. __, regarding approval of the stipulation attached hereto as **Exhibit 1** (the "Stipulation");[2] and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and the matter being a core proceeding within the meaning of 28 U.S.C. § 157(b)(2); and venue of this proceeding and the Certification of Counsel in this District being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court being able to issue a final order consistent with Article III of the United States Constitution; and due and sufficient notice of the Certification of Counsel having been given under the particular circumstances; and it appearing that no other or further notice is necessary; and it appearing that the relief requested in the Certification of Counsel is in the best interests of the GUC Trust, the Debtors, their estates, their creditors, and other parties in interest; and after due deliberation thereon; and good and sufficient cause appearing therefor; it is hereby

ORDERED, ADJUDGED, AND DECREED that:

1. The Stipulation attached hereto as **Exhibit 1** is hereby approved.

2. This Order expressly authorizes the disclosure by the Parties, in connection with these Chapter 11 Cases or any proceeding arising in or under them, and subject to the terms of the Stipulation, of information protected by: (i) the Health Insurance Portability and Accountability Act of 1996, as amended by the Health Information Technology for Economic and Clinical Health Act; (ii) 42 C.F.R. Part 2; (iii) 45 C.F.R. §§ 164.512(e)(1)(ii)(B) and 164.512(e)(1)(v); and (iv) applicable state privacy and security laws. This Order is expressly intended to and shall constitute a "Qualified Protective Order" under the foregoing privacy and security rules.

[2] Capitalized terms not otherwise defined herein have the meanings ascribed to them in the Stipulation.

3. The GUC Trustee and Dias are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Stipulation.

4. The Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

5. Counsel to the GUC Trustee shall, within three days of the entry of this Order, cause a copy of this Order to be served by electronic mail or first-class mail, as applicable, on all parties served with the Certification of Counsel, and shall, via their claims and noticing agent, promptly file a certificate of service reflecting the same.

END OF ORDER

Prepared and presented by:

/s/ *Tori L. Remington*

TROUTMAN PEPPER LOCKE LLP
Mathew R. Brooks (GA ID #378018)
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Counsel to the GUC Trustee

Exhibit 1

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

In re	)	Chapter 11
	)	Case No. 24-55507-PMB
LAVIE CARE CENTERS, LLC, *et al.*,[3]	)	
	)	(Jointly Administered)
Reorganized Debtors.	)	

STIPULATED AND AGREED
CONFIDENTIALITY AGREEMENT AND PROTECTIVE ORDER

This Stipulated and Agreed to Confidentiality Agreement and Protective Order (the "Stipulation") is entered into by and among: (a) the GUC Trustee, as defined in the *Joint Chapter 11 Plan of Reorganization* (the "Plan")[4] confirmed in the above-captioned chapter 11 cases (collectively, the "Chapter 11 Cases"); (b) Dias and Associates, P.A. ("Dias"); and (c) any other persons or entities who become bound by the Stipulation by signifying their assent through execution of **Exhibit A** hereto. Each of the persons or entities identified in the foregoing clauses (a) through (c) shall be referred to herein individually as a "Party," and, collectively, as the "Parties." The Parties, through their respective attorneys of record and subject to Court approval, have agreed to entry of this Stipulation pursuant to 11 U.S.C. § 107(b) and Rule 9018 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and, with respect to any existing or

[3] 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.kccllc.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.

[4] Capitalized terms not otherwise defined herein have the meanings ascribed to them in the Plan.

future examination, contested matter or adversary proceeding, pursuant to Bankruptcy Rules 2004, 7026, and 9014 and Rule 26(c) of the Federal Rules of Civil Procedure (the "Federal Rules").

Recitals

WHEREAS, the Plan requires the above-captioned Reorganized Debtors to provide the GUC Trustee with access to the Debtors' Books and Records, including those held by third parties, to the extent reasonably necessary for the GUC Trustee to perform his duties under the Plan;

WHEREAS, Dias holds Books and Records of the Debtors (the "Dias Books and Records") that are reasonably necessary for the GUC Trustee to reconcile and/or prosecute objections to certain Class 6A and Class 6B Claims (the "Claims Proceedings");

WHEREAS, certain of the Dias Books and Records may contain protected health information ("PHI"), as defined in the Health Insurance Portability and Accountability Act of 1996 ("HIPAA"), or other personally identifiable information;

NOW, THEREFORE, to facilitate and expedite the production and treatment of the Dias Books and Records, the Parties stipulate and agree as follows:

1. The Parties hereby submit this Stipulation to the Court for approval. The Parties shall abide by and be bound by the terms of this Stipulation at the time it is fully executed by the Parties.

2. Unless otherwise agreed by the Parties or ordered by the Court, all deadlines stated herein shall be computed pursuant to Bankruptcy Rule 9006.

Automatic Designation of Confidential Material

3. Dias Books and Records containing any of the following shall automatically be deemed to be designated as "CONFIDENTIAL" (the "Confidential Material"): (i) material that constitutes, in whole or in part, the medical records of any individual and/or directly or indirectly

identifies any person and relates to (a) that person's past, present, or future physical or mental health or condition, (b) the provision of health care, services, or supplies to that person, or (c) the past, present, or future payment for the provision of health care to the person; or (ii) private health or personal information protected under (a) HIPAA, as amended by the Health Information Technology for Economic and Clinical Health Act, (b) 42 C.F.R. Part 2, (c) 45 C.F.R. §§ 164.512(e)(1)(ii)(B) and 164.512(e)(1)(v), and (d) applicable state privacy and security laws. Subsection (i) includes, but is not limited to: medical bills, claim forms, claims data, grievances or appeals, charge sheets, medical records, medical charts, test results, notes, dictation, invoices, itemized billing statements, remittance advice forms, explanations of benefits, checks, notices, and requests, and any summaries or compilations of the information contained in those documents.

4. Material shall not be deemed to be Confidential Material to the extent it is, at the time of production, or subsequently becomes, without any wrongful act or omission of the receiving Party, generally available to the public.

Use and Disclosure of Confidential Material

5. Applicability of Prior Protective Order: Except as otherwise set forth herein, Confidential Material hereunder shall be subject to the provisions regarding Confidential Material set forth in the *Order Approving Stipulated and Agreed to Confidentiality Agreement and Protective Order* [Docket No. 334].

6. General Limitations: All Confidential Material shall be used by the GUC Trustee solely for the purpose of carrying out his duties under the Plan, including Claims Proceedings, and not for any other purpose, including any other litigation or judicial proceedings, or any business, competitive, governmental, or administrative purpose or function.

7. Persons to Whom Confidential Material May Be Disclosed: Absent further order of the Court, Confidential Material shall be disclosed only to the following persons:

a. The GUC Trustee;

b. Outside counsel and other professionals, including financial advisors, for the GUC Trustee and any applicable non-Parties and the employees of such professionals to whom such professionals, in good faith, believe it is necessary that the discovery material be disclosed to assist in the conduct of the Claims Proceedings, including commercial copiers and similar outside litigation support firms;

c. Deponents and their counsel, during the course of depositions in the Claims Proceedings, provided that such persons have executed the undertaking attached hereto as **Exhibit A**;

d. Independent experts or consultants, retained for the purpose of aiding the counsel of record in the Claims Proceedings, provided that such persons have executed the undertaking attached hereto as **Exhibit A**;

e. If the Confidential Material is documentary in form, including electronic records such as emails and text messages, any person who is shown on the document as an author or recipient of it;

f. Any witness testifying under oath, provided such person has, in advance of disclosure, executed the undertaking of **Exhibit A**;

g. The Court and court personnel, and court reporters, videographers and others necessarily incident to the conduct of the Claims Proceedings;

h. Any mediator (and mediator's staff) engaged by the GUC Trustee to mediate a Claims Proceeding;

i. Any other person by stipulation of the Parties or by order of the Court.

8. Duration of Order: This Order shall remain binding and in full effect unless and until otherwise agreed in writing by the Parties or ordered by the Court.

General Provisions

9. Obligations Following Conclusion of Claims Proceedings. Within 90 days of the conclusion of all Claims Proceedings, including appeals, the GUC Trustee and all non-Parties that received Confidential Material (each, a "Receiving Party") shall return to Dias or destroy all such Confidential Material, except that a Receiving Party may retain Confidential Material that is otherwise required to be retained pursuant to any law or regulation, provided that such retained

Confidential Material will continue to be treated as provided in this stipulation. If a Receiving Party chooses to take all commercially reasonable steps to destroy, rather than return, documents in accordance with this paragraph, that Receiving Party shall, if requested by the Dias, verify such destruction in writing to Dias.

10. Amendment of Stipulated Confidentiality Agreement: Upon good cause shown, and on notice to all Parties, any Party may move to amend the provisions of this Stipulation at any time or the Parties may agree by written stipulation, subject to further order of the Court if applicable, to amend the provisions of this Stipulation.

11. Enforcement: Upon entry of an order of the Court approving this Stipulation, the provisions of this Stipulation shall constitute an order of this Court and violations of the provisions of this Stipulation are subject to enforcement and the imposition of legal sanctions in the same manner as any other order of the Court.

[*remainder of page intentionally left blank*]

IT IS SO STIPULATED AND AGREED:

Dated: April 28, 2026

Respectfully submitted,

TROUTMAN PEPPER LOCKE LLP

/s/ *Tori L. Remington*
Mathew R. Brooks (GA ID #378018)
Deborah Kovsky-Apap (admitted *pro hac vice*)
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Counsel to the GUC Trustee

DIAS AND ASSOCIATES, P.A.

/s/ *Dave Thomas*
Dave Thomas
Dias and Associates, P.A.

EXHIBIT A

Declaration of Acknowledgment

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

In re	)	Chapter 11
	)	Case No. 24-55507-PMB
LAVIE CARE CENTERS, LLC, *et al.*,[5]	)	
	)	(Jointly Administered)
Reorganized Debtors.	)	

DECLARATION OF ACKNOWLEDGEMENT AND AGREEMENT TO BE BOUND BY THE STIPULATED AND AGREED CONFIDENTIALITY AGREEMENT AND PROTECTIVE ORDER

1. My name is

_____.

2. I reside at:

_____.

3. My present employer is

_____.

4. My present occupation or job description is

_____.

5. [If applicable] I have been engaged as _____ on behalf of _____ in connection with the above-captioned chapter 11 cases (the "Chapter 11 Cases").

[5] 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.kccllc.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.

6. I declare under penalty of perjury that I have read and understand the terms of the *Stipulated and Agreed Confidentiality Agreement and Protective Order* (the "Stipulation") and corresponding *Order Approving Stipulated and Agreed Confidentiality Agreement and Protective Order* [Docket No. __] (the "Order") issued by the United States Bankruptcy Court for the Northern District of Georgia in the Chapter 11 Cases.

7. I agree to comply with and be bound by all the provisions of the Stipulation. I agree that I will not use Confidential Material for any purpose other than as set forth in the Stipulation, and will not disclose or cause Confidential Material to be disclosed to anyone not expressly permitted by the Stipulation to receive Confidential Material.

8. I understand that I am to retain in confidence from all individuals not expressly permitted to receive Confidential Material, whether at home, at work, or elsewhere, all copies of any Confidential Material, and that I will carefully maintain such materials in a manner consistent with the Stipulation. I acknowledge that the return or destruction of Confidential Material shall not relieve me from any other continuing obligations imposed upon me by the Stipulation.

9. By acknowledging the obligations under the Stipulation, I understand that I am submitting myself to the jurisdiction of the United States Bankruptcy Court for the Northern District of Georgia for the purpose of any issue or dispute arising hereunder and that my willful violation of any term of the Stipulation could subject me to punishment for contempt of court.

10. I sign this statement:

__ on behalf of myself as an individual, and/or

__ on behalf of the entity identified in Paragraph 5 of this **Exhibit A**.

By: _____ Executed on _____, 20__.