Docket #1373 Date Filed: 06/08/2026

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.*,	)	
	)	(Jointly Administered)
Debtors.[1]	)	
	)	
	)	

STIPULATION AND AGREED ORDER REGARDING
CERTAIN HEALTHCARE SERVICES GROUP PROOFS OF CLAIM

This stipulation and agreed order (this "Stipulation") is made by and between the GUC Trustee[2] and Healthcare Services Group, Inc. ("HSG," and together with the GUC Trustee, the "Parties"), by and through their respective undersigned counsel, regarding certain HSG proofs of claim.

[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 used but not defined herein have the meanings ascribed to such terms in the Plan, as defined herein.

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RECITALS

WHEREAS, on June 2, 2024 and June 3, 2024, LaVie Care Centers, LLC and certain of its affiliates (collectively, the "Debtors") filed in the United States Bankruptcy Court for the Northern District of Georgia (Atlanta Division) (the "Court") their respective voluntary petitions for bankruptcy relief under chapter 11 of title 11 of the United States Code;

WHEREAS, the Court on July 2, 2024 entered its *Order (I) Establishing Bar Dates for Filing Claims Against the Debtors; and (II) Granting Related Relief* [Docket No. 218];

WHEREAS, at a hearing on July 10, 2024, the Court granted relief permitting entities with claims against multiple Debtors to file a single, consolidated proof of claim in the bankruptcy case of Debtor LaVie Care Centers, LLC;

WHEREAS, HSG thereafter timely filed in such case a consolidated proof of claim (Proof of Claim No. 1039) (the "Master Claim"), asserting against certain Debtors (each, a "Liable Debtor") claims (i) arising from allegedly unpaid invoices for goods, materials, and services (collectively, "Services") provided by HSG and (ii) for amounts allegedly due and owing on a joint and several basis under that certain *Promissory Note* dated September 29, 2018 (the "Note Claim"), all as set forth in greater detail therein;

WHEREAS, Exhibit B to the Master Claim states the amount of the claims asserted by HSG against each Liable Debtor;

WHEREAS, the Court on December 5, 2024 entered *Findings of Fact, Conclusions of Law, and Order Approving on Final Basis and Confirming Debtors' Modified Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* [Docket No. 735] (the "Confirmation Order"), confirming the *Debtors' Modified Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* [Docket No. 730] (the "Plan");

WHEREAS, the Plan in pertinent part provides:

> [T]o the extent a Joint & Several OpCo General Unsecured Claim is determined to be valid and enforceable on a joint and several basis against at least one OpCo Debtor and at least one DivestCo Debtor, such claim shall be (1) Allowed in the full amount of such claim against the applicable OpCo Debtor(s) and be entitled to Distribution as a Class 6A Claim and Class 6C Claim and (2) Allowed once in the full amount of such claim against the applicable DivestCo Debtor(s) and shall be entitled to Distribution as a Class 6B Claim (Plan, Art. V.A.);

WHEREAS, the Effective Date of the Plan occurred on June 1, 2025, *see* [Docket No. 1016], and the GUC Trust was formed on that date;

WHEREAS, the Plan grants the GUC Trustee, who oversees and administers the GUC Trust, the authority to (among other things) reconcile and resolve claims of general unsecured creditors;

WHEREAS, the GUC Trustee, in consultation with the Debtors' claims and noticing agent ("Verita"), became aware that Verita filed 165 additional proofs of claim on behalf of HSG, each of which was identical to the Master Claim (each such additional proof of claim, a "Duplicative Claim");[3]

WHEREAS, the Duplicative Claims were reflected on the claims registry for each Liable Debtor, causing the claims registry for each Liable Debtor to reflect the Master Claim ***and*** the applicable Duplicative Claim;

WHEREAS, the GUC Trustee, after reviewing the Master Claim and Duplicative Claims, wishes to reconcile and correct the claims registry; and

WHEREAS, HSG has consented to the disposition of the Master Claim and Duplicative Claims as set forth herein.

[3] Each Duplicative Claim is listed on **Exhibit A** hereto.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED, AND UPON APPROVAL BY THE BANKRUPTCY COURT OF THIS STIPULATION, IT IS ORDERED AS FOLLOWS:

1. The recitals set forth above are incorporated by reference as though fully set forth herein.

2. Upon endorsement by the Court of this Stipulation:

   a. each Duplicative Claim (*i.e.*, each Proof of Claim set forth on Exhibit A hereto) shall be, and shall be deemed to be, withdrawn and expunged in its entirety;

   b. the Master Claim is allowed subject to the following: based on the substantive consolidation of the OpCo Debtors' Estates and the DivestCo Debtors' Estates, each as provided for in paragraph 41 of the Confirmation Order, the allowed Master Claim shall consist of the following amounts in the following Classes –

      i. Class 6A: $43,816,794.50[4]
      ii. Class 6B: $53,248,481.74[5]
      iii. Class 6C: $26,217,387.91;[6] and

   c. the Clerk of Court and Verita are hereby authorized and directed to reflect the above relief on the docket and claims register for the above-captioned bankruptcy case.

3. The Parties are authorized and empowered to take all actions necessary to implement the relief provided by this Stipulation.

[4] This portion of the Master Claim (Class 6A – $43,816,794.5) consists of the Note Claim plus the aggregate of the Services claims asserted in the Master Claim against each Liable Debtor that is an OpCo Debtor.

[5] This portion of the Master Claim (Class 6B - $53,248,481.74) consists of the Note Claim plus the aggregate of the Services claims asserted in the Master Claim against each Liable Debtor that is a DivestCo Debtor.

[6] This portion of the Master Claim (Class 6C – $26,217,387.91) consists of the Note Claim and has been allowed and paid previously. It is included herein solely for purposes of a complete accounting and is not, by this Stipulation, entitled to additional distributions as a Class 6C Claim.

4. The terms and conditions of this Stipulation shall be immediately effective and enforceable upon entry by the Court.

5. This Stipulation may be executed in counterparts, including by facsimile or other electronic means, and each such counterpart together with the others shall constitute one and the same instrument.

6. This Stipulation shall be binding upon all successors and assigns of the Parties.

7. Each person who executes this Stipulation on behalf of a Party represents that he or she is duly authorized and has requisite authority to execute and deliver this Stipulation on behalf of such Party and to bind his or her respective Party to the terms and conditions of this Stipulation.

8. This Stipulation constitutes the entire agreement between the Parties with respect to the matters addressed herein and may not be modified except in a writing signed by the Parties. The Parties agree that each of them has had a full opportunity to participate in the drafting of this Stipulation and any claimed ambiguity shall be construed neither for nor against any of the Parties.

9. The GUC Trustee shall, within three (3) business days of 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 Stipulation, and a certificate of service confirming such service shall be filed promptly thereafter.

10. This Court hereby retains jurisdiction with respect to all matters arising from or related to the implementation of this Stipulation.

IN WITNESS WHEREOF, the Parties have caused this Stipulation to be executed as of the day and year written below.

Dated: June 8, 2026

Prepared and Agreed to by:

PARKER, HUDSON, RAINER & DOBBS LLP

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Counsel for Healthcare Services Group, Inc.

Exhibit A

Duplicative Claims

	Debtor Name	Claim No.
1.	125 Alma Boulevard Operations LLC	1432
2.	195 Mattie M. Kelly Boulevard Operations LLC	1433
3.	216 Santa Barbara Boulevard Operations LLC	1434
4.	Oaks at Sweeten Creek HealthCare LLC	1435
5.	500 South Hospital Drive Operations LLC	1436
6.	Hunter Woods HealthCare LLC	1437
7.	518 West Fletcher Avenue Operations LLC	1438
8.	Ashland Facility Operations LLC	1439
9.	611 South 13th Street Operations LLC	1440
10.	Ashton Court HealthCare LLC	1441
11.	Country Meadow Facility Operations LLC	1442
12.	626 North Tyndall Parkway Operations LLC	1443
13.	Omro HealthCare LLC	1444
14.	Jacksonville Facility Operations LLC	1445
15.	Assisted Living at Frostburg Village Facility Operations LLC	1446
16.	Crestline Facility Operations LLC	1447
17.	650 Reed Canal Road Operations LLC	1448
18.	Augusta Facility Operations LLC	1449
19.	702 South Kings Avenue Operations LLC	1450
20.	Kannapolis HealthCare LLC	1452
21.	Piketon Facility Operations LLC	1460

22.	3825 Countryside Boulevard Operations LLC	1463
23.	Westwood HealthCare LLC	1464
24.	Ferriday HealthCare LLC	1466
25.	Orange Park Facility Operations LLC	1470
26.	3920 Rosewood Way Operations LLC	1472
27.	710 North Sun Drive Operations LLC	1473
28.	4200 Washington Street Operations LLC	1475
29.	741 South Beneva Road Operations LLC	1476
30.	4641 Old Canoe Creek Road Operations LLC	1478
31.	Baya Nursing and Rehabilitation LLC	1479
32.	Kenton Facility Operations LLC	1480
33.	Manor at St. Luke Village Facility Operations LLC	1481
34.	777 Ninth Street North Operations LLC	1483
35.	Bayonet Point Facility Operations LLC	1486
36.	5065 Wallis Road Operations LLC	1487
37.	McComb HealthCare LLC	1488
38.	5405 Babcock Street Operations LLC	1489
39.	Kenwood View HealthCare LLC	1490
40.	Melbourne Facility Operations LLC	1491
41.	Lake Parker Facility Operations LLC	1492
42.	1010 Carpenters Way Operations LLC	1493
43.	Whispering Hills Facility Operations LLC	1494
44.	Bossier HealthCare LLC	1495
45.	1120 West Donegan Avenue Operations LLC	1496

46.	6305 Cortez Road West Operations LLC	1497
47.	Donegan Square Health Care Associates LLC	1498
48.	Miami Facility Operations LLC	1499
49.	Lakeland Facility Operations LLC	1500
50.	1026 Albee Farm Road Operations LLC	1501
51.	6414 13th Road South Operations LLC	1502
52.	Brandon Facility Operations LLC	1503
53.	1445 Howell Avenue Operations LLC	1504
54.	Port Charlotte Facility Operations LLC	1505
55.	Kings Daughters Facility Operations LLC	1506
56.	6700 NW 10th Place Operations LLC	1507
57.	7950 Lake Underhill Road Operations LLC	1508
58.	1061 Virginia Street Operations LLC	1509
59.	Mount Royal Facility Operations LLC	1510
60.	2826 Cleveland Avenue Operations LLC	1511
61.	Brentwood Meadow Health Care Associates LLC	1512
62.	Kissimmee Facility Operations LLC	1513
63.	1465 Oakfield Drive Operations LLC	1514
64.	Wellington HealthCare LLC	1515
65.	Edinborough Square Health Care Associates LLC	1516
66.	Emerald Ridge HealthCare LLC	1517
67.	9035 Bryan Dairy Road Operations LLC	1518
68.	1111 Drury Lane Operations LLC	1519
69.	Reeders Facility Operations LLC	1520

70.	Legends Facility Operations LLC	1521
71.	9311 South Orange Blossom Trail Operations LLC	1522
72.	Valley View HealthCare LLC	1523
73.	Parkview HealthCare LLC	1524
74.	1507 South Tuttle Avenue Operations LLC	1525
75.	Pensacola Facility Operations LLC	1526
76.	Osprey Nursing and Rehabilitation LLC	1527
77.	1937 Jenks Avenue Operations LLC	1528
78.	Envoy of Staunton LLC	1529
79.	Vero Beach Facility Operations LLC	1530
80.	2916 Habana Way Operations LLC	1531
81.	1550 Jess Parrish Court Operations LLC	1532
82.	Envoy of Williamsburg LLC	1533
83.	Perry Facility Operations LLC	1534
84.	Paloma Blanca Health Care Associates LLC	1535
85.	2939 South Haverhill Road Operations LLC	1536
86.	Envoy of Fork Union LLC	1537
87.	Envoy of Alexandria LLC	1538
88.	Cary HealthCare LLC	1539
89.	Wellston Facility Operations LLC	1540
90.	Envoy of Winchester LLC	1541
91.	Lucasville I Facility Operations LLC	1542
92.	Parkview Manor HealthCare LLC	1543
93.	Perry Village Facility Operations LLC	1544

94.	Envoy of Goochland LLC	1545
95.	1615 Miami Road Operations LLC	1546
96.	Catalina Gardens Health Care Associates LLC	1547
97.	1820 Shore Drive Operations LLC	1548
98.	Envoy of Woodbridge LLC	1549
99.	Lucasville II Facility Operations LLC	1550
100.	Cardinal North Carolina HealthCare LLC	1551
101.	3001 Palm Coast Parkway Operations LLC	1552
102.	Envoy of Lawrenceville LLC	1553
103.	Walnut Cove HealthCare LLC	1554
104.	West Altamonte Facility Operations LLC	1555
105.	Envoy of Norfolk LLC	1556
106.	Locust Grove Facility Operations LLC	1557
107.	Pavilion at St. Luke Village Facility Operations LLC	1558
108.	3101 Ginger Drive Operations LLC	1559
109.	Parkview Facility Operations LLC	1560
110.	2333 North Brentwood Circle Operations LLC	1561
111.	3110 Oakbridge Boulevard Operations LLC	1562
112.	Envoy of Forest Hills LLC	1563
113.	Penn Village Facility Operations LLC	1564
114.	West Palm Beach Facility Operations LLC	1565
115.	1851 Elkcam Boulevard Operations LLC	1566
116.	Envoy of Richmond LLC	1567
117.	2401 NE 2nd Street Operations LLC	1568

118.	3735 Evans Avenue Operations LLC	1569
119.	Pennknoll Village Facility Operations LLC	1570
120.	Pheasant Ridge Facility Operations LLC	1571
121.	Luther Ridge Facility Operations LLC	1572
122.	Westerville Facility Operations LLC	1573
123.	Envoy of Somerset LLC	1574
124.	Glenburney HealthCare LLC	1575
125.	St. Petersburg Facility Operations LLC	1576
126.	Grayson Facility Operations LLC	1577
127.	Starkville Manor HealthCare LLC	1578
128.	Green Cove Facility Operations LLC	1579
129.	Greenfield Facility Operations LLC	1580
130.	Summit Facility Operations LLC	1581
131.	Williamsburg Facility Operations LLC	1582
132.	Susquehanna Village Facility Operations LLC	1583
133.	Swan Pointe Facility Operations LLC	1584
134.	Hilltop Mississippi HealthCare LLC	1585
135.	Tallahassee Facility Operations LLC	1586
136.	Willowbrook HealthCare LLC	1587
137.	Wilora Lake HealthCare LLC	1588
138.	Windsor Facility Operations LLC	1589
139.	Winona Manor HealthCare LLC	1590
140.	Winter Haven Facility Operations LLC	1591
141.	Woodstock Facility Operations LLC	1592

142.	Retirement Village of North Strabane Facility Operations LLC	1593
143.	9355 San Jose Boulevard Operations LLC	1594
144.	Cheswick Facility Operations LLC	1595
145.	New Port Richey Facility Operations LLC	1596
146.	Ridgewood Facility Operations LLC	1597
147.	10040 Hillview Road Operations LLC	1598
148.	Newport News Facility Operations LLC	1599
149.	Riley HealthCare LLC	1600
150.	11565 Harts Road Operations LLC	1601
151.	Forrest Oakes HealthCare LLC	1602
152.	Norfolk Facility Operations LLC	1603
153.	12170 Cortez Boulevard Operations LLC	1604
154.	Franklinton HealthCare LLC	1605
155.	15204 West Colonial Drive Operations LLC	1606
156.	North Fort Myers Facility Operations LLC	1614
157.	Clay County HealthCare LLC	1622
158.	Frostburg Facility Operations LLC	1627
159.	North Strabane Facility Operations LLC	1629
160.	Garden Court HealthCare LLC	1631
161.	Oak Grove HealthCare LLC	1635
162.	Gateway HealthCare LLC	1636
163.	Safety Harbor Facility Operations LLC	1639
164.	Sarasota Facility Operations LLC	1642
165.	Skyline Facility Operations LLC	1646