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.[1]	)	(Jointly Administered)

STIPULATION AND AGREED ORDER REGARDING
CERTAIN SHIFTMED PROOFS OF CLAIM

This stipulation and agreed order (this "Stipulation") is made by and between the GUC Trustee[2] and ShiftMed, LLC ("ShiftMed," and together with the GUC Trustee, the "Parties," and

[1] The last four digits of LaVie Care Centers, LLC's federal tax identification number are 5592. There were 282 Debtors in these chapter 11 cases, see Case Nos. 24-55504 through 24-55787, which the Court ordered jointly administered under the above caption (Docket No. 20) at the Debtors' request (Docket No. 3). All these cases except this lead case are now closed. See Docket No. 1206. A complete list of the jointly administered Debtors and the last four digits of their federal tax identification numbers 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 used but not defined herein have the meanings ascribed to such terms in the Plan, as defined herein.

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each, a "Party"), by and through their respective undersigned counsel, regarding certain ShiftMed proofs of claim.

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 Debtors on July 16, 2024 began filing their respective schedules of assets and liabilities, which reflected (among other things) three scheduled claims of ShiftMed totaling $80,285 (the "Scheduled Amount") [Case No. 24-55575, Docket No. 8; Case No. 24-55693, Docket No. 8; Case 24-55600, Docket No. 8];

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, the Court at a July 10, 2024 hearing 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, *see* Transcript of Hearing [Docket No. 248] at 19:1-21:12;

WHEREAS, ShiftMed thereafter timely filed in such case a consolidated proof of claim (Proof of Claim No. 2896) (the "Master Claim"), asserting against certain Debtors (each, a "Liable Debtor") claims arising from allegedly unpaid invoices for staffing services provided by ShiftMed;

WHEREAS, the Master Claim (i) states a general unsecured claim totaling $22,495,170.85 in the aggregate and (ii) contains exhibits apportioning the same amongst 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], confirming the *Debtors' Modified Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization*, filed on December 4, 2024 [Docket No. 730] (the "Plan");

WHEREAS, the Effective Date of the Plan occurred on June 1, 2025, *see 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*, filed on June 2, 2025 [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 divided the Master Claim into separate, individual proofs of claim, thereby assigning one proof of claim per Liable Debtor as detailed in **Exhibit A** hereto (each such listed claim, a "Duplicative Claim");

WHEREAS, the claims registry thus reflects the Master Claim ***and*** each Duplicative Claim;

WHEREAS, the GUC Trustee, after review of the Master Claim and Duplicative Claims, does not dispute the aggregate amount set forth in the Master Claim but wishes to reconcile and correct the claims registry; and

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

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 shall be, and shall be deemed to be, withdrawn and expunged in its entirety;

   b. the Master Claim is allowed in full, but for purposes of treatment and distribution shall be divided between Class 6A ($1,281,475)[3] and Class 6B ($21,293,981);[4] 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. 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.

[3] This figure (Class 6A: $1,281,475) includes that portion of the Scheduled Amount for which an OpCo Debtor is liable.

[4] This figure (Class 6B: $21,293,981) includes that portion of the Scheduled Amount for which one or more DivestCo Debtors is/are liable.

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.

[*Remainder of Page Left Intentionally Blank; Signatures Follow*]

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

Dated: June 29, 2026

Prepared and Agreed to by:

PARKER, HUDSON, RAINER & DOBBS LLP

By: */s/ /Matthew G. Roberts*
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Counsel for ShiftMed, LLC

Exhibit A

Duplicative Claims

	Debtor Name	Claim No.	Claim Amount
1.	Osprey Nursing and Rehabilitation LLC	2903	$56,232.98
2.	1820 Shore Drive Operations LLC	2905	$38,523.26
3.	1550 Jess Parrish Court Operations LLC	2906	$476,296.09
4.	1851 Elkcam Boulevard Operations LLC	2907	$647,641.11
5.	Pavilion at St. Luke Village Facility Operations LLC	2908	$22,757.02
6.	125 Alma Boulevard Operations LLC	2910	$413,415.13
7.	500 South Hospital Drive Operations LLC	2911	$300,667.91
8.	518 West Fletcher Avenue Operations LLC	2912	$759,824.45
9.	2333 North Brentwood Circle Operations LLC	2913	$249,392.17
10.	Jacksonville Facility Operations LLC	2914	$115,237.35
11.	Penn Village Facility Operations LLC	2915	$3,460.76
12.	650 Reed Canal Road Operations LLC	2917	$22,186.95
13.	Pensacola Facility Operations LLC	2918	$245,474.52
14.	710 North Sun Drive Operations LLC	2919	$674,962.85
15.	2916 Habana Way Operations LLC	2921	$19,572.36
16.	Perry Facility Operations LLC	2922	$371,617.71
17.	4641 Old Canoe Creek Road Operations LLC	2923	$745,567.22
18.	Bayonet Point Facility Operations LLC	2925	$183,765.53
19.	3001 Palm Coast Parkway Operations LLC	2927	$198,592.99
20.	Port Charlotte Facility Operations LLC	2928	$47,482.82
21.	1010 Carpenters Way Operations LLC	2929	$306,089.99

	Debtor Name	Claim No.	Claim Amount
22.	West Altamonte Facility Operations LLC	2930	$704,170.13
23.	1026 Albee Farm Road Operations LLC	2931	$480,814.33
24.	6700 NW 10th Place Operations LLC	2932	$355,234.42
25.	1061 Virginia Street Operations LLC	2933	$172,114.37
26.	3101 Ginger Drive Operations LLC	2934	$502,423.50
27.	Kissimmee Facility Operations LLC	2935	$263,593.25
28.	7950 Lake Underhill Road Operations LLC	2936	$2,382,205.86
29.	9035 Bryan Dairy Road Operations LLC	2937	$1,349,895.76
30.	1445 Howell Avenue Operations LLC	2938	$341,984.32
31.	9311 South Orange Blossom Trail Operations LLC	2939	$1,619,272.89
32.	9355 San Jose Boulevard Operations LLC	2940	$304,617.32
33.	1507 South Tuttle Avenue Operations LLC	2941	$991,361.75
34.	New Port Richey Facility Operations LLC	2942	$504,881.21
35.	Emerald Ridge HealthCare LLC	2943	$14,867.54
36.	10040 Hillview Road Operations LLC	2944	$820,497.13
37.	11565 Harts Road Operations LLC	2945	$1,147,111.95
38.	Forrest Oakes HealthCare LLC	2946	$14,151.88
39.	3735 Evans Avenue Operations LLC	2947	$434,241.17
40.	3920 Rosewood Way Operations LLC	2948	$61,522.88
41.	12170 Cortez Boulevard Operations LLC	2967	$34,479.75
42.	15204 West Colonial Drive Operations LLC	2968	$1,113,410.51
43.	North Fort Myers Facility Operations LLC	2969	$1,159,331.02
44.	Green Cove Facility Operations LLC	2970	$656,730.18

	Debtor Name	Claim No.	Claim Amount
45.	St. Petersburg Facility Operations LLC	2981	$587,418.28
46.	Tallahassee Facility Operations LLC	2985	$298,109.72