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)

JOINT MOTION TO CONTINUE THE HEARING ON THE SECOND INTERIM SEALING ORDER

The GUC Trustee and Defendants in the adversary proceeding, Case No. 26-05140-PMB (collectively, the "Movants"), by and through their undersigned counsel, file this Joint Motion to Continue the Hearing on the Second Interim Sealing Order (this "Motion") and respectfully represent as follows:

INTRODUCTION

1. On June 12, 2026, the Court entered the Second Interim Order Granting GUC Trustee's Motion for Leave to File Adversary Complaint and Supporting Documents Under Seal, Unsealing the Adversary Proceeding, and Providing Notice of Continued Hearing [Docket No. 1376] (the "Second Interim Order"). The Second Interim Order, among other things, (a) maintained the

[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.

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sealing of the Complaint Documents[2] pending a hearing to determine whether continued sealing is appropriate and, if so, to what extent; (b) unsealed Adversary Proceeding No. 26-05140-PMB other than the Complaint Documents; and (c) set a continued hearing for July 9, 2026, at 10:00 a.m. in Courtroom 1202 of the Richard B. Russell Federal Building and United States Courthouse, Atlanta, Georgia, with remote attendance available via the Court's Virtual Hearing Room.

2. The Movants jointly request that the Court continue the July 9, 2026 hearing to July 23, 2026, or a later date convenient for the Court, to allow Defendants' counsel additional time to confer with her clients regarding the lawsuit and the sealing issues, and thereby provide the Court with Defendants' position as to sealing and/or redacting certain portions of the Complaint Documents.

BACKGROUND

3. On May 29, 2026, the GUC Trustee filed a Motion for Leave to File Adversary Complaint and Supporting Documents Under Seal [Docket No. 1361] (the "Motion to Seal"), seeking leave to file a complaint and related documents under seal.

4. On June 1, 2026, the Court entered the Interim Order Granting GUC Trustee's Motion for Leave to File Adversary Complaint Under Seal [Docket No. 1364] (the "Prior Order"), which granted the Motion to Seal on an interim basis, allowed the Complaint Documents to be filed under seal, and set a hearing for June 11, 2026.

5. On June 12, 2026, the Court entered the Second Interim Order [Docket No. 1376], which reset the hearing to July 9, 2026, to permit Defendants to be served with the Complaint Documents

[2] Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the Second Interim Order.

and to provide additional time for Defendants and other interested parties to respond to the sealing request.

6. On July 1, 2026, Jill Dunn of Freeman Mathis & Gary, LLP emailed counsel for the GUC Trustee to introduce herself and advise that she had been retained to represent the Defendants in the adversary proceeding—Case No. 26-05140-PMB. Ms. Dunn stated that she was still getting up to speed, understood that a hearing was scheduled for July 9, 2026, and asked to discuss the case with counsel for the GUC Trustee.

7. On July 2, 2026, Defendants' counsel communicated to counsel for the GUC Trustee that she had not been able to make contact with all of the Defendants to formalize her engagement, obtain signed engagement letters, and confer with them regarding the lawsuit, complaint, and sealing issues. Defendants' counsel represented that she is diligently working to reach all Defendants but does not believe that process can be completed by July 9, 2026.

BASIS FOR CONTINUANCE

8. Good cause exists for a brief continuance of the July 9, 2026 hearing. Specifically:

(a) Defendants' counsel is attempting to contact all Defendants, formalize her representation, obtain engagement letters, and confer with her clients about the lawsuit, complaint, and sealing issues;

(b) Not all Defendants have been reached, and most, but not all, Defendants have been served;

(c) Continuing the hearing will allow the Court to receive a more complete and efficient presentation from all Defendants as to the issues of sealing and/or

redactions of the Complaint Documents rather than piecemeal statements from only those Defendants who have been contacted;

(d) The continuance is sought in good faith and not for the purpose of delay;

(e) The Complaint Documents will remain sealed during the continuance unless the Court orders otherwise, and no party will be prejudiced by a brief continuance; and

9. The GUC Trustee does not oppose the requested continuance and joins in this Motion.

REQUESTED RELIEF

10. WHEREFORE, the Movants respectfully request that the Court enter an order:

(a) Continuing the July 9, 2026 hearing on the Second Interim Order to July 23, 2026 or a later date convenient for the Court;

(b) Maintaining the existing interim sealing protections pending the continued hearing; and

(c) Granting such other and further relief as the Court deems just and proper.

Respectfully submitted,

COUNSEL FOR THE GUC TRUSTEE:

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CERTIFICATE OF SERVICE

I hereby certify that on July 6, 2026, I electronically filed the foregoing document using the Court's CM/ECF system, which will send a notice of electronic filing to all parties registered to receive electronic notice in this case.

/s/ Alan Dabdoub
Alan Dabdoub

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

IN RE:	CHAPTER 11
LAVIE CARE CENTERS, LLC, *et al.*,	CASE NO. 24-55507-PMB
Debtors.	JOINTLY ADMINISTERED

ORDER GRANTING JOINT MOTION TO CONTINUE HEARING ON SECOND INTERIM SEALING ORDER

Before the Court is the *Joint Motion to Continue the Hearing on the Second Interim Sealing Order* [Docket No. 1385] (the "Motion"), filed jointly by the GUC Trustee and the Defendants in Adversary Proceeding No. 26-05140-PMB (collectively, the "Movants"). On June 12, 2026, the Court entered the *Second Interim Order (I) Keeping Complaint and Supporting Documents Under Seal and (II) Notice of Hearing to Determine Whether to Make Interim Sealing Final* [Docket No. 1376] (the "Second Interim Order"), which, among other things, set a continued hearing on final approval of the Motion to Seal for July 9, 2026, at 10:00 a.m. Capitalized terms used but not defined in this Order have the meanings ascribed to them in the Motion or the Second Interim Order, as applicable.

The Court, having considered the Motion, the docket, and the record in these cases, finds that good cause exists for the relief requested, that the continuance is sought in good faith and not for purposes of delay, and that no party in interest will be prejudiced by the relief granted herein. Accordingly, it is hereby

ORDERED that the Motion is **GRANTED** as set forth herein. It is further

ORDERED AND NOTICE IS HEREBY GIVEN that the continued hearing to consider final approval of the Motion to Seal, previously scheduled for July 9, 2026, is **CONTINUED** to the **23rd day of July, 2026, commencing at 10:00 a.m.**, in Courtroom 1202, at the Richard B. Russell Federal Building and United States Courthouse, 75 Ted Turner Drive, S.W., Atlanta, Georgia 30303, which may be attended in person or via the Court's Virtual Hearing Room. You may join the Virtual Hearing Room through the "Dial-in and Virtual Bankruptcy Hearing Information" link at the top of the homepage of the Court's website, www.ganb.uscourts.gov, or the link on the Judge's webpage, which can also be found on the Court's website. Please also review the "Hearing Information" tab on the Judge's webpage for further information about the hearing. You should be prepared to appear at the hearing via video, but you may leave your camera in the off position until the Court instructs otherwise. Unrepresented persons who do not have video capability may use the telephone dial-in information on the Judge's webpage. It is further

ORDERED that the Second Interim Order remains in full force and effect, and the Complaint Documents shall remain **SEALED**, pending the continued hearing and further order of the Court, and all rights of parties in interest to object to, or otherwise be heard regarding, the continued sealing or redaction of the Complaint Documents are preserved for the continued hearing.

The Clerk's Office is hereby directed to serve a copy of this Order and Notice on counsel for the Debtor, counsel for the GUC Trustee, special counsel to the GUC Trustee, and the United States Trustee. Counsel for the GUC Trustee is hereby directed to serve a copy of this Order and Notice on all parties served with the Motion to Seal (including all the defendants) and on all "Parties" whose "Designated Material" (as those terms are defined in the Protective Order) is included in the Complaint or in the exhibits thereto.

[END OF DOCUMENT]