Docket #1388 Date Filed: 07/13/2026

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 OMNICARE PROOFS OF CLAIM

This stipulation and agreed order (this "Stipulation") is made by and between the GUC Trustee[2] and Omnicare, LLC (f/k/a Omnicare, Inc.), on behalf of itself and certain of its affiliates (collectively, "Omnicare"; together with the GUC Trustee, the "Parties," and each, a "Party"), by and through their respective undersigned counsel, regarding certain Omnicare proofs of claim.

[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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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 relief under Chapter 11 of the Bankruptcy 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, 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, Omnicare thereafter timely filed in such case a consolidated proof of claim (Proof of Claim No. 4672) (the "Master Claim"), asserting against certain Liable Debtors (as defined therein) claims arising out of allegedly unpaid invoices for consulting services and pharmaceutical goods provided by Omnicare;

WHEREAS, the Master Claim (i) asserts general unsecured claims and administrative priority claims totaling, respectively, $9,979,302.51 (the "GUC Amount") and $387,682.67 (the "Priority Amount") in the aggregate and (ii) contains exhibits apportioning the GUC Amount and Priority Amount among 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 filed additional proofs of claim on behalf of Omnicare against each Liable Debtor asserting the same claims Omnicare asserted against such Liable Debtor in the Master Claim (each such additional proof of claim, a "Duplicative Claim");[3]

WHEREAS, the claims register 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 GUC Amount but wishes to reconcile and correct the claims register; and

WHEREAS, Omnicare 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:

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

a. the Duplicative Claims shall be, and shall be deemed to be, withdrawn and expunged in their entirety;

b. the Master Claim is allowed with respect to the GUC Amount, which shall be divided between Class 6A (allowed amount: $3,121,300) and Class 6B (allowed amount: $6,858,002) for purposes of treatment and distribution; 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. For the avoidance of doubt, this Stipulation does not allow, disallow, or affect in any way the Priority Amount set forth in the Master Claim.

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

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

6. 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.

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

8. 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.

9. 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.

10. 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.

11. 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: July 13, 2026

Prepared and Agreed to by:

PARKER, HUDSON, RAINER & DOBBS LLP

By: /s/ *Matthew G. Roberts*
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Counsel for Omnicare, LLC (f/k/a Omnicare,Inc.)

Exhibit A

Duplicative Claims

	Debtor Name	Claim No.
1	125 Alma Boulevard Operations LLC	4748
2	195 Mattie M. Kelly Boulevard Operations LLC	4749
3	216 Santa Barbara Boulevard Operations LLC	4750
4	Oaks at Sweeten Creek HealthCare LLC	4751
5	500 South Hospital Drive Operations LLC	4752
6	Hunter Woods HealthCare LLC	4753
7	518 West Fletcher Avenue Operations LLC	4754
8	Ashland Facility Operations LLC	4755
9	611 South 13th Street Operations LLC	4756
10	Hurstbourne HealthCare LLC	4757
11	Ashton Court HealthCare LLC	4758
12	Country Meadow Facility Operations LLC	4759
13	626 North Tyndall Parkway Operations LLC	4760
14	Omro HealthCare LLC	4761
15	Jacksonville Facility Operations LLC	4762
16	Assisted Living at Frostburg Village Facility Operations LLC	4763
17	Crestline Facility Operations LLC	4764
18	Jennings HealthCare LLC	4765
19	650 Reed Canal Road Operations LLC	4766
20	Augusta Facility Operations LLC	4767
21	702 South Kings Avenue Operations LLC	4768

	Debtor Name	Claim No.
22	Kannapolis HealthCare LLC	4769
23	Orange Park Facility Operations LLC	4770
24	710 North Sun Drive Operations LLC	4771
25	741 South Beneva Road Operations LLC	4772
26	Baya Nursing and Rehabilitation LLC	4773
27	Kenton Facility Operations LLC	4774
28	777 Ninth Street North Operations LLC	4775
29	Bayonet Point Facility Operations LLC	4776
30	1010 Carpenters Way Operations LLC	4777
31	Bossier HealthCare LLC	4778
32	1026 Albee Farm Road Operations LLC	4779
33	Brandon Facility Operations LLC	4780
34	Kings Daughters Facility Operations LLC	4781
35	Down East HealthCare LLC	4782
36	1061 Virginia Street Operations LLC	4783
37	Kissimmee Facility Operations LLC	4784
38	1111 Drury Lane Operations LLC	4785
39	Valley View HealthCare LLC	4786
40	Lake Parker Facility Operations LLC	4787
41	1120 West Donegan Avenue Operations LLC	4788
42	Lakeland Facility Operations LLC	4789
43	1445 Howell Avenue Operations LLC	4790
44	1465 Oakfield Drive Operations LLC	4791

	Debtor Name	Claim No.
45	Emerald Ridge HealthCare LLC	4792
46	Brownsboro Hills HealthCare LLC	4793
47	1507 South Tuttle Avenue Operations LLC	4794
48	Osprey Nursing and Rehabilitation LLC	4795
49	Vero Beach Facility Operations LLC	4796
50	1550 Jess Parrish Court Operations LLC	4797
51	Libby HealthCare LLC	4798
52	Paloma Blanca Health Care Associates LLC	4799
53	Envoy of Alexandria LLC	4800
54	1615 Miami Road Operations LLC	4801
55	1820 Shore Drive Operations LLC	4802
56	Lincoln Center HealthCare LLC	4803
57	Cardinal North Carolina HealthCare LLC	4804
58	Envoy of Denton LLC	4805
59	Locust Grove Facility Operations LLC	4806
60	Parkview Facility Operations LLC	4807
61	Envoy of Forest Hills LLC	4808
62	1851 Elkcam Boulevard Operations LLC	4809
63	Parkview HealthCare LLC	4810
64	1937 Jenks Avenue Operations LLC	4811
65	Envoy of Fork Union LLC	4812
66	Cary HealthCare LLC	4813
67	Parkview Manor HealthCare LLC	4814

	Debtor Name	Claim No.
68	Envoy of Goochland LLC	4815
69	Lucasville II Facility Operations LLC	4816
70	Envoy of Lawrenceville LLC	4817
71	Parkwell HealthCare LLC	4818
72	Walnut Cove HealthCare LLC	4819
73	Envoy of Norfolk LLC	4820
74	Pavilion at St. Luke Village Facility Operations LLC	4821
75	2333 North Brentwood Circle Operations LLC	4822
76	3825 Countryside Boulevard Operations LLC	4823
77	Westwood HealthCare LLC	4824
78	Envoy of Pikesville LLC	4825
79	Pine River HealthCare LLC	4826
80	Ferriday HealthCare LLC	4827
81	Wayne HealthCare LLC	4828
82	3920 Rosewood Way Operations LLC	4829
83	4200 Washington Street Operations LLC	4830
84	Penn Village Facility Operations LLC	4831
85	4641 Old Canoe Creek Road Operations LLC	4832
86	Manor at St. Luke Village Facility Operations LLC	4833
87	Envoy of Richmond LLC	4834
88	2401 NE 2nd Street Operations LLC	4835
89	5065 Wallis Road Operations LLC	4836
90	Pennknoll Village Facility Operations LLC	4837

	Debtor Name	Claim No.
91	McComb HealthCare LLC	4838
92	5405 Babcock Street Operations LLC	4839
93	Melbourne Facility Operations LLC	4840
94	Luther Ridge Facility Operations LLC	4841
95	Whispering Hills Facility Operations LLC	4842
96	6305 Cortez Road West Operations LLC	4843
97	Envoy of Somerset LLC	4844
98	Miami Facility Operations LLC	4845
99	2826 Cleveland Avenue Operations LLC	4846
100	6414 13th Road South Operations LLC	4847
101	Port Charlotte Facility Operations LLC	4848
102	6700 NW 10th Place Operations LLC	4849
103	7950 Lake Underhill Road Operations LLC	4850
104	Mount Royal Facility Operations LLC	4851
105	9035 Bryan Dairy Road Operations LLC	4852
106	Charlwell HealthCare LLC	4853
107	Reeders Facility Operations LLC	4854
108	9311 South Orange Blossom Trail Operations LLC	4855
109	Chenal HealthCare LLC	4856
110	New Harmonie HealthCare LLC	4857
111	Retirement Village of North Strabane Facility Operations LLC	4858
112	Whitehall of Ann Arbor Healthcare LLC	4859
113	9355 San Jose Boulevard Operations LLC	4860

	Debtor Name	Claim No.
114	Cheswick Facility Operations LLC	4861
115	New Port Richey Facility Operations LLC	4862
116	Ridgewood Facility Operations LLC	4863
117	Wellington HealthCare LLC	4864
118	10040 Hillview Road Operations LLC	4865
119	2916 Habana Way Operations LLC	4866
120	Perry Facility Operations LLC	4867
121	Newport News Facility Operations LLC	4868
122	2939 South Haverhill Road Operations LLC	4869
123	Pensacola Facility Operations LLC	4870
124	Envoy of Staunton LLC	4871
125	Riley HealthCare LLC	4872
126	Envoy of Winchester LLC	4873
127	Envoy of Woodbridge LLC	4874
128	11565 Harts Road Operations LLC	4875
129	3001 Palm Coast Parkway Operations LLC	4876
130	West Altamonte Facility Operations LLC	4877
131	Forrest Oakes HealthCare LLC	4878
132	3101 Ginger Drive Operations LLC	4879
133	West Palm Beach Facility Operations LLC	4880
134	Norfolk Facility Operations LLC	4881
135	3735 Evans Avenue Operations LLC	4882
136	12170 Cortez Boulevard Operations LLC	4883

	Debtor Name	Claim No.
137	Pheasant Ridge Facility Operations LLC	4884
138	Franklinton HealthCare LLC	4885
139	Westerville Facility Operations LLC	4886
140	Piketon Facility Operations LLC	4887
141	15204 West Colonial Drive Operations LLC	4888
142	Riverbend HealthCare LLC	4889
143	North Fort Myers Facility Operations LLC	4890
144	Clay County HealthCare LLC	4891
145	Frostburg Facility Operations LLC	4892
146	Royal Terrace HealthCare LLC	4893
147	Garden Court HealthCare LLC	4894
148	Oak Grove HealthCare LLC	4895
149	Gateway HealthCare LLC	4896
150	Safety Harbor Facility Operations LLC	4897
151	Sarasota Facility Operations LLC	4898
152	Sheridan Indiana HealthCare LLC	4899
153	Skyline Facility Operations LLC	4900
154	Glenburney HealthCare LLC	4901
155	St. Petersburg Facility Operations LLC	4902
156	Grayson Facility Operations LLC	4903
157	Starkville Manor HealthCare LLC	4904
158	Green Cove Facility Operations LLC	4905
159	Stratford Facility Operations LLC	4906

	Debtor Name	Claim No.
160	Greenfield Facility Operations LLC	4907
161	Summit Facility Operations LLC	4908
162	Williamsburg Facility Operations LLC	4909
163	Harbor Pointe Facility Operations LLC	4910
164	Swan Pointe Facility Operations LLC	4911
165	Hilltop Mississippi HealthCare LLC	4912
166	Tallahassee Facility Operations LLC	4913
167	Willowbrook HealthCare LLC	4914
168	Wilora Lake HealthCare LLC	4915
169	Windsor Facility Operations LLC	4916
170	Winona Manor HealthCare LLC	4917
171	Winter Haven Facility Operations LLC	4918
172	Woodstock Facility Operations LLC	4919
173	KD HealthCare LLC	4920
174	Kenwood View HealthCare LLC	4921
175	Kimwell HealthCare LLC	4924
176	Brentwood Meadow Health Care Associates LLC	4925
177	Legends Facility Operations LLC	4926
178	Lucasville I Facility Operations LLC	4927
179	Catalina Gardens Health Care Associates LLC	4928
180	Envoy of Williamsburg LLC	4929
181	Wellston Facility Operations LLC	4930
182	Perry Village Facility Operations LLC	4931

	Debtor Name	Claim No.
183	3110 Oakbridge Boulevard Operations LLC	4932
184	Montclair HealthCare LLC	4933
185	North Strabane Facility Operations LLC	4934
186	Clearwater HealthCare LLC	4935
187	Whitehall of Novi HealthCare LLC	4937
188	Susquehanna Village Facility Operations LLC	4938