Docket #1389 Date Filed: 07/14/2026

**IT IS ORDERED as set forth below:**

**Date: July 14, 2026**

Paul Baisier

**Paul Baisier**
**U.S. Bankruptcy Court Judge**

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**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

[2] Capitalized terms used but not defined herein have the meanings ascribed to such

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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*
Harris B. Winsberg (Bar No. 770892)
Matthew G. Roberts (Bar No. 367914)
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*Co-counsel for the GUC Trust*

JENNER & BLOCK LLP

By: /s/ *Melissa Root*
(*w/ express permission, by Matthew G. Roberts*)
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Email: mroot@jenner.com

*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 |