**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) |

**GUC TRUSTEE'S THIRD POST-EFFECTIVE DATE STATUS REPORT TO HOLDERS OF GENERAL UNSECURED CLAIMS**

Ryniker Consultants, LLC, in its capacity as the trustee (the "GUC Trustee") for the trust (the "GUC Trust") established on behalf of the above-captioned debtors and debtors-in-possession (the "Debtors") pursuant to the *Debtors' Modified Second Amended Combined Disclosure Statement and Joint Chapter 11 Plan of Reorganization* [D.I. 730-1] (the "Plan"),[2] hereby reports (this "Status Report") as follows:

## STATUS REPORT

### 1. Class 6A Claims and Claim Reconciliation

1. As detailed in the Second Status Report, the GUC Trustee has made substantial progress in addressing and resolving Class 6A Claims. *See* Second Status Report ¶ 2. To further progress the reconciliation of Class 6A Claims, over the last few months the GUC Trustee has:

[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.

[2] Capitalized terms not defined herein are defined in the Plan, the *GUC Trustee's First Post-Effective Date Status Report to Holders of General Unsecured Claims* [D.I. 1218] (the "Initial Status Report") or the *GUC Trustee's Second Post-Effective Date Status Report to Holders of General Unsecured Claims* [D.I. 1323] (the "Second Status Report"), as applicable.

- Engaged with Class 6A Claimholders who may wish to liquidate such claim in a non-bankruptcy forum and recover from the Debtors' available insurance, if any. Those discussions generally remain ongoing, but several claimants have entered into stipulations to liquidate his or her claim in a non-bankruptcy forum, recover through the Debtors' insurance, if any, and waive claims against the GUC Trust.

- Prepared additional objections to Class 6A Claims, which have been filed or will be filed in the near term.

- Resolved via stipulation(s) certain Class 6A Claims, many of which were duplicative of Class 6B Claims.

- Responded to numerous inquiries from creditors and their counsel regarding potential resolutions and status of Class 6A Claims.

2. In addition to the foregoing, the GUC Trustee has commenced the Offer and Exchange Procedures under the Plan's Unliquidated Claim Procedures (the "UCPs") with respect to certain Class 6A Claims. It anticipates commencing these procedures with the remaining applicable Class 6A Claims in the near term. If you have filed an unliquidated personal injury Class 6A Claim, and such claim has not otherwise been disallowed or resolved in accordance with the Plan, you may have received (or may shortly receive) communication from the undersigned counsel on resolving such Class 6A Claim. If you have not received communication from the undersigned counsel in accordance with the Offer and Exchange Procedures, please feel free to contact Tori L. Remington, counsel to the GUC Trustee, at tori.remington@troutman.com to request a status update.

3. The GUC Trustee anticipates completing its reconciliation of the remaining Class 6A Claims in the next 6-8 months. The GUC Trustee is not in a position to make interim distributions at this time in light of the size of the reserve that would be required for disputed and unliquidated Class 6A Claims.

**2. The D&O Litigation and Class 6B Claims**

4. As prefaced in the Second Status Report, the GUC Trustee retained contingency counsel to pursue litigation claims for the benefit of Class 6B Claimholders. On June 1, 2026, the GUC Trustee commenced an adversary proceeding in this Court asserting numerous claims against certain of the Debtors' current and former directors, officers, and managers (the "D&O Action"). *See Adv. Pro.* 26-05140. The GUC Trustee has engaged defendants' counsel in the D&O Action, though the D&O Action remains in the preliminary stage of litigation.

5. The GUC Trustee anticipates that it will begin to reconcile certain categories of Class 6B Claims in the coming months.

**3. The Debtors' Insurance and Insurance Recoveries**

6. Earlier in 2026, the GUC Trustee completed its review and analysis of the Debtors' insurance policies, along with the loss run information provided by the Debtors' carriers.

7. Over the past few months, the GUC Trustee has been negotiating with Claimholders (or counsel) who may wish to liquidate their claim in a non-bankruptcy forum and recover through the Debtors' available insurance, if any. These negotiations remain ongoing, but the GUC Trustee anticipates completing this process by the end of this quarter. Any Claimholder (or their counsel) who believes their claim may be covered by insurance and has not been contacted to date is invited to reach out to Tori L. Remington, counsel to the GUC Trustee, at tori.remington@troutman.com.

**4. The Backstop Note**

8. In accordance with the Plan, on or before the Effective Date, the Reorganized Debtors and the GUC Trustee entered into that certain Backstop Note, the obligations under which reduce on a dollar-for-dollar basis as Divested Accounts Receivables are converted to cash and transferred to the GUC Trust until $2 million net proceeds under the Divested Accounts Receivable

are received by the GUC Trust. *See* Plan, Art. I § 1.32 (defining Backstop Note); Plan, Art. VI § B.3 (discussing the Backstop Note and the Backstop Note Guaranty). The proceeds of the Backstop Note partially comprise the DivestCo GUC Allocation and will, in addition to any recovery from the D&O Action, benefit Class 6B Claimholders.

9. Following the Effective Date, the GUC Trust periodically received payments from the Debtors in partial satisfaction of the Backstop Note. On June 10, 2026, the GUC Trustee received the balance of the Backstop Note. The GUC Trustee has also been reviewing additional paths to recover more Divested Accounts Receivable for the benefit of Class 6B Claimholders.

**5. The Plan Injunction and Unliquidated Claim Procedures Injunction**

10. The Plan Injunction and Unliquidated Claim Procedures Injunction precludes holders of claims from pursuing or liquidating claims other than as set forth in the Plan. Both injunctions remain in full force and effect.

## CONCLUSION

The GUC Trustee may file one or more status report(s) to the extent it is deemed necessary or appropriate in the GUC Trustee's sole discretion.

*[Signature Page Follows]*

Dated: August 25, 2026

**TROUTMAN PEPPER LOCKE LLP**

*/s/ Tori L. Remington*

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