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 MOTION FOR ENTRY OF AN ORDER FURTHER EXTENDING THE DEADLINE BY WHICH THE GUC TRUSTEE MAY OBJECT TO 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] by and through its undersigned counsel, hereby files this motion (the "Motion"), pursuant to section 105 of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq*. (the "Bankruptcy Code"), and Rule 9006 of the Federal Rules of Bankruptcy Procedures (the "Bankruptcy Rules") for entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Proposed Order"), further extending the deadline by which the GUC Trustee may object to claims (the "Claim Objection Deadline") through and including Monday, May 24, 2027. In support of this Motion, the GUC Trustee respectfully represents as follows:

[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.

RELIEF REQUESTED

1. By this Motion, the GUC Trustee requests entry the Proposed Order further extending the Claims Objection Deadline through and including Monday, May 24, 2027, without prejudice to seek a further extension as applicable.

JURISDICTION

2. The United States Bankruptcy Court for the Northern District of Georgia, Atlanta Division (the "Court") has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b). Venue of these cases and the Motion in this District is proper under 28 U.S.C. §§ 1408 and 1409.

3. The predicates for the relief requested herein are section 105 of the Bankruptcy and Bankruptcy Rule 9006.

BACKGROUND

4. On June 2 and June 3, 2024 (the "Petition Date"), the Debtors each filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code with the Court. The Debtors remained in possession of their property and continued to operate their business as debtors-in-possession in accordance with Sections 1107 and 1108 of the Bankruptcy Code. On June 13, 2024, the Office of the United States Trustee for Region 21 (the "U.S. Trustee") appointed an official committee in the Bankruptcy Cases.

5. On December 5, 2024, the Court entered the *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] (the "Confirmation Order"), confirming the Debtors' Plan. In accordance with the Plan, the GUC Trust was formed on the Effective Date. The Plan became effective on June 1, 2025 (the "Effective Date"). *See* Docket No. 1016.

6. The Plan grants the GUC Trustee, who oversees and administers the GUC Trust, the authority to reconcile and resolve claims of general unsecured creditors, including by filing objections to claims. *See* Plan, Art. VIII § J. The Plan established the initial Claims Objection Deadline as 180 days from the Effective Date (as defined in the Plan)—or November 28, 2025—unless such period is extended by the Bankruptcy Court upon motion of the GUC Trustee pursuant to the Plan. *See* Plan, Art. VIII § J. The current Claims Objection Deadline is November 23, 2026. *See* D.I. 1343.

7. The GUC Trustee files this Motion to further extend the Claims Objection Deadline, which is expressly contemplated under the Plan, through and including Monday, May 24, 2027. This is the GUC Trustee's third request to extend the Claims Objection Deadline. For the avoidance of doubt, the relief requested herein shall not affect or otherwise impair the Unliquidated Claim Procedures, which remain in full force and effect.

BASIS FOR RELIEF REQUESTED

8. Bankruptcy Rule 9006(b) provides that the Court may extend any time period provided under the Bankruptcy Rules or order of the Court. Bankruptcy Rule 9006 provides, in pertinent part, as follows:

> Except as provided in paragraphs (2) and (3) of this subdivision when an act is required or allowed to be done at or within a specified period by these rules or by a notice given thereunder or by order of court, the court for cause shown may at any time in its discretion (1) with or without motion or notice order the period enlarged if the request therefor is made before the expiration of the period originally prescribed or as extended by a previous order.

FED. R. BANKR. P. 9006(b)(1). The Plan approved by this Court contemplates extending this deadline, as it provides that the GUC Trustee may extend the Claims Objection Deadline. *See* Plan, Art. VIII § J. In addition, the Court has broad authority under section 105(a) of the Bankruptcy Code to issue orders necessary to implement provisions of the Plan and the Bankruptcy Code. *See*

11 U.S.C. § 105(a) ("The court may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of [the Bankruptcy Code].").

9. Here, there is sufficient cause to extend the Claims Objection Deadline as requested herein. Over 5,000 claims in Class 6A and Class 6B were filed in these cases, many of which require substantial review and analysis. Since the Effective Date, the GUC Trustee has made good faith, substantive steps in progressing these cases and reviewing and reconciling these claims against the Debtors in accordance with the Plan. For example, among other things, the GUC Trustee has:

- Reviewed over 1,100 Class 6A Claims and designated them as Class 6B Claims in accordance with the Plan. *See* D.I. 1240, 1281, 1297.
- Identified Class 6A and Class 6B Claims that may be covered by the Debtors' insurance and began negotiating with such holders to pursue a liquidation of their claims in state court.
- Obtained orders sustaining various omnibus claims objections.
- Resolved via stipulation(s) hundreds of Class 6 Claims, many of which were duplicative of Class 6B Claims.
- Commenced the Offer and Exchange Procedures under the Unliquidated Claim Procedures with respect to certain Class 6A Claims.
- Responded to numerous inquiries from creditors and their counsel regarding potential resolutions and status of Claims.
- Began reconciling certain Class 6B Claims.[3]

The GUC Trustee will continue to reconcile the Class 6 Claims to progress these Chapter 11 Cases.

10. Notwithstanding the significant progress the GUC Trustee has already made, given the significant volume of claims filed against the Debtors and the complex issues related to many

[3] As noted in the *GUC Trustee's Third Post-Effective Date Status Report to Holders of General Unsecured Claims* [D.I. 1399] (the "Status Report"), the GUC Trustee is focusing its claims reconciliation on Class 6A Claims, but it has begun to reconcile certain Class 6B Claims.

of these claims, the GUC Trustee needs additional time to complete its claim reconciliation. It therefore files the Motion, which was expressly contemplated under the Plan, to ensure it has adequate time to reconcile the claims filed against the Debtors in accordance with the Plan. Absent a further extension of the Claims Objection Deadline, the GUC Trustee will be forced to make a distribution to many claimants who might not hold legitimate claims, thereby reducing the recoveries for legitimate creditors. To facilitate a fair and meaningful distribution to holders of allowed claims under the Plan and maximize estate value, the Claims Objection Deadline must therefore be extended.

11. Finally, granting the relief requested herein will not prejudice any party in interest. The GUC Trustee was appointed to administer the Debtors' estates in accordance with the Plan and GUC Trustee Agreement. As part of that appointment, the GUC Trustee is obligated to reconcile certain claims and make a distribution, if available, thereon. Extending the Claims Objection Deadline merely permits the GUC Trustee to do so in a fair and efficient manner.

12. This jurisdiction has granted requests similar to the relief the GUC Trustee seeks through this Motion. *E.g.*, *In re AAD Capital Partners LLC, et al.*, Case No. 22-58233 (JRS) [D.I. 272] (Bankr. N.D. Ga. 2024) (granting a request extending the claim objection deadline by approximately 250 days).

13. For these reasons, sufficient cause exists to extend the Claims Objection Deadline as requested herein. This Motion should be granted.

RESERVATION OF RIGHTS

14. The Liquidating Trustee reserves the right to seek further extensions of the Claims Objection Deadline.

NOTICE

15. Notice of this Motion will be provided to: (i) the Debtors; (ii) the Office of the United States Trustee for the Northern District of Georgia; and (iii) all persons and entities identified in the Limited Service List in these cases.

CONCLUSION

WHEREFORE, the GUC Trustee respectfully requests that the Court enter the Proposed Order attached hereto as **Exhibit A** extending the Claims Objection Deadline through and including May 24, 2027, without prejudice to seek a further extension as applicable.

Dated: October 5, 2026

TROUTMAN PEPPER LOCKE LLP

/s/ Tori L. Remington

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Counsel to the GUC Trustee

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

In re	Chapter 11
	Case No. 24-55507-PMB
LAVIE CARE CENTERS, LLC, *et al.*[1]	
	(Jointly Administered)
Debtors.	
	CONTESTED MATTER
	Objection Deadline: October 26, 2026, at 4:00 p.m. (ET)

NOTICE OF HYBRID HEARING AND DEADLINE TO OBJECT TO GUC TRUSTEE'S MOTION FOR ENTRY OF AN ORDER FURTHER EXTENDING THE DEADLINE BY WHICH THE GUC TRUSTEE MAY OBJECT TO 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"), has filed the *Motion for Entry of an Order Extending the Deadline by Which the GUC Trustee May Object to Certain Claims* (the "Motion") on October 5, 2026.

Pursuant to the Fifth Amended and Restated General Order 24-2018, the Court may consider this matter without further notice or a hearing if no party in interest files a response or objection within twenty-one (21) days from the date of service of this notice. **If you object to the relief requested in the Motion, you must timely file your objection with the Bankruptcy Clerk** at Clerk, U.S. Bankruptcy Court, 75 Ted Turner Drive, SW, Atlanta, GA 30303, and serve a copy upon the GUC Trustee's counsel, (i) Matthew R. Brooks, Troutman Pepper Locke LLP, 600 Peachtree Street, NE, Suite 3000, Atlanta, GA 30308, (ii) Deborah Kovsky, 875 Third Avenue, New York, NY 10022, and (ii) Tori Remington, 1313 N. Market Street, Suite 1000, Wilmington, Delaware 19801, by the objection deadline. The response or objection must explain your position and actually be received by the Bankruptcy Clerk within the required time.

A hybrid hearing on this Motion has been scheduled for **October 29, 2026, at 1:30 p.m. (ET)** in Courtroom 1202, United States Courthouse, 75 Ted Turner Drive, SW, Atlanta, GA 30303, which may be attended in person or virtually via the Court's Virtual Hearing Room. You may join

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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 Virtual Hearing Room link on Judge Baisier's webpage, which can be found at https://www.ganb.uscourts.gov/content/honorable-paul-m-baisier. Please also review the "Hearing Information" tab on Judge Baisier'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 Judge Baisier's webpage.

If an objection or response is timely filed and served, the hearing will proceed as scheduled. If you do not file a response or objection within the time permitted, the Court may grant the relief requested without further notice or a hearing, provided that an order approving the relief requested is entered at least one business day prior to the scheduled hearing. If no objection is timely filed, but no order is entered granting the relief requested at least one business day prior to the hearing, the hearing will be held at the time and place as scheduled.

Your rights may be affected. You should read these papers carefully and discuss with your attorney, if you have one in this bankruptcy case. If you do not have an attorney, you may wish to consult one.

Dated: October 5, 2026

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Counsel to the GUC Trustee

Exhibit A

Proposed Order

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)
	Re: Docket No. _____

ORDER GRANTING THE GUC TRUSTEE'S MOTION FOR ENTRY OF AN ORDER FURTHER EXTENDING THE CLAIMS OBJECTION DEADLINE

Upon consideration of *the GUC Trustee's Motion for Entry of an Order Further Extending the Claims Objection Deadline* [D.I. _____] (the "Motion") filed by the GUC Trustee on October 5, 2026;[2] and the Court having found jurisdiction over the Objection pursuant to 28 U.S.C. §§ 1334

[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 Motion.

and 157(b); and having found that venue is proper in this district pursuant to 28 U.S.C. §§1408 and 1409 and this is a core proceeding pursuant to 28 U.S.C. § 157(b); and having found that a hearing was scheduled on the Motion on October 29, 2026, at 1:30 p.m. (ET); and having found that notice of opportunity to object to the Motion and opportunity for a hearing was provided pursuant to *Fifth Amended and Restated General Order 24-2018*; and having found that no objection to the Motion was filed prior to the applicable objection deadline on October 26, 2026, at 4:00 p.m. (ET); and having found that a hearing is not necessary under the *Fifth Amended and Restated General Order 24-2018* as no party timely filed a response to the Motion; and having found that no further notice or hearing is required; and having found that the Court has considered the Motion, including the lack of objection thereto; and after due deliberation the Court having determined that good causes exists for the relief requested in the Motion; and after due deliberation and sufficient cause appearing therefor; it is hereby **ORDERED, ADJUDGED, AND DECREED THAT:**

1. The Motion is **GRANTED** as set forth herein.

2. The Claims Objection Deadline is hereby extended through and including May 24, 2027, without prejudice to the right to seek a further extension.

3. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

4. The GUC Trustee is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

5. The GUC Trustee shall, within three (3) business days of entry of the 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 Motion, and a certificate of service confirming such service shall be filed promptly thereafter.

6. Notwithstanding anything in the Bankruptcy Rules, this Order is effective immediately upon its entry.

7. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

END OF DOCUMENT

Prepared and Presented by:

TROUTMAN PEPPER LOCKE

/s/ Tori L. Remington

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