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

In re LAVIE CARE CENTERS, LLC, *et al.*[1] Debtors.	Chapter 11 Case No. 24-55507-PMB (Jointly Administered) CONTESTED MATTER
RYNIKER CONSULTANTS, LLC Movant. vs. Dominque Latham, Respondent.	**Objection Deadline**: December 4, 2026, at 4:00 p.m. (ET) **Hearing**: December 10, 2026, at 1:30 p.m. (ET)

NOTICE OF GUC TRUSTEE'S OMNIBUS (I) OBJECTION TO CLAIM OF DOMINIQUE LATHAM, AND (II) MOTION TO (A) ENFORCE PLAN INJUNCTION AND UNLIQUIDATED CLAIM PROCEDURES INJUNCTION, AND (B) BAR MS. LATHAM FROM CONTACTING THE GUC TRUSTEE OR ITS PROFESSIONALS AND HEARING OF SAME

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 *GUC Trustee's Omnibus (I) Objection to Claim of Dominique Latham, and (II) Motion to (A) Enforce Plan Injunction and Unliquidated Claim Procedures Injunction, and (B) Bar Ms. Latham from Contacting the GUC Trustee or its Professionals* (the "Objection and Motion") on November 4, 2026.

Pursuant to the Fifth Amended and Restated General Order 24-2018, the Court may consider the Objection and Motion without further notice or a hearing if no party in interest files a

[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.

response or objection within thirty (30) days from the date of service of this notice. **If you object to the relief requested in the Objection and 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 **December 10, 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 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 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: November 4, 2026

TROUTMAN PEPPER LOCKE LLP

/s/ Tori L. Remington

Mathew R. Brooks (GA ID #378018)
600 Peachtree Street, NE, Suite 3000
Atlanta, GA 30308
Telephone: 404.885.3901
Email: matthew.brooks@troutman.com

-and-

Deborah Kovsky-Apap (admitted *pro hac vice*)
875 Third Avenue
New York, NY 10022
Telephone: 212.704.6000
Email: deborah.kovsky@troutman.com
-and-

Tori L. Remington (admitted *pro hac vice*)
Hercules Plaza
1313 N. Market Street, Suite 1000
Wilmington, DE 19801
Telephone: 302.777.6500
Email: tori.remington@troutman.com

Counsel to the GUC Trustee

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

In re LAVIE CARE CENTERS, LLC, *et al.*[1] Debtors.	Chapter 11 Case No. 24-55507-PMB (Jointly Administered) CONTESTED MATTER
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GUC TRUSTEE'S OMNIBUS (I) OBJECTION TO CLAIM OF DOMINIQUE LATHAM, AND (II) MOTION TO (A) ENFORCE PLAN INJUNCTION AND UNLIQUIDATED CLAIM PROCEDURES INJUNCTION, AND (B) BAR MS. LATHAM FROM CONTACTING THE GUC TRUSTEE OR ITS PROFESSIONALS

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"), hereby (i) objects (this "Objection") to Proof of Claim No. 198, as amended by Proof of Claim No. 5181 (the

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"Latham Claim"), filed by Dominique Latham ("Ms. Latham"), and (ii) moves (this "Motion") to enforce the Plan Injunction and the Unliquidated Claim Procedures Injunction (each as defined below) against Ms. Latham and to bar her from contacting the GUC Trustee or its professionals. In support of this Objection and Motion, the GUC Trustee relies on, and incorporates herein by reference, the declaration of Tori Remington (the "Remington Declaration"), and respectfully represents as follows:

PRELIMINARY STATEMENT

1. Since the confirmation of the Plan, the GUC Trustee and its professionals have diligently administered the GUC Trust. They have spent significant time reconciling thousands of Claims filed by personal injury claimants and others in these Chapter 11 Cases. Fortunately, it has not had to address abusive, hostile, or threatening conduct in that reconciliation process.

2. Until now. Ms. Latham—who asserts a facially deficient proof of claim for $500,000,000.00 that must be disallowed—has chosen to forgo complying with the Plan Injunction and Unliquidated Claim Procedures Injunction and instead has spent months bombarding and harassing the GUC Trustee's counsel with over 110 emails either consisting of vulgar, abusive and threatening remarks or demands for an immediate "direct deposit" of $500 million—and at times far more. She has told counsel to "hurry up and die," and "f*** you and your family," and that she wants to "spit in your face and s*** in your caskets." She has threatened the undersigned counsel, warning that "im going to teach you about playing with me and my money." She made false representations to third parties that Troutman Pepper Locke is her counsel, forcing the undersigned to waste Trust resources responding to those third parties and correcting Ms. Latham's lies. She even directed a vulgar insult at the judge overseeing these proceedings, and in the same email chain, wrote "i hope he die."

3. Ms. Latham's conduct is not merely reprehensible and in violation of the Court's injunctions; it is costly. It has consumed scarce GUC Trust resources—including the cost of this Objection and Motion—and forced counsel's law firm to implement security protocols to protect the undersigned counsel. For these reasons, the GUC Trustee requests that the Court disallow the Latham Claim, enforce the Plan Injunction and the Unliquidated Claim Procedures Injunction against Ms. Latham, and exercise its authority under section 105(a) of the Bankruptcy Code to bar Ms. Latham from any further contact with the GUC Trustee or its professionals.

JURISDICTION

4. The United States Bankruptcy Court for the Northern District of Georgia, Atlanta Division (the "Court") has jurisdiction to consider the Objection and 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, the Objection, and the Motion in this District is proper under 28 U.S.C. §§ 1408 and 1409.

5. The predicates for the relief requested herein are Bankruptcy Code sections 105 and 502, Rule 3007(d)(1) of the Federal Rules of Bankruptcy Procedures (the "Bankruptcy Rules"), Rule 3007-1 of the Local Rules of the United States Bankruptcy Court for the Northern District of Georgia (the "Local Rules"), and the *Order (I) Approving (A) Omnibus Claims Objection Procedures and (B) Filing of Substantive Claims Objections, (II) Waiving the Requirement of Bankruptcy Rule 3007(e)(6), and (III) Granting Related Relief* [Docket No. 1003] (the "Omnibus Claim Objection Procedures Order").

BACKGROUND

6. 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 "Chapter 11 Cases"). 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.

7. On June 13, 2024, the Office of the United States Trustee for Region 21 (the "U.S. Trustee") appointed [D.I. 112] an official committee in the Chapter 11 Cases. No trustee or examiner has been appointed in the Chapter 11 Cases.

8. On July 2, 2024, the Court entered the *Order (I) Establishing Bar Dates for Filing Claims Against the Debtors; and (II) Granting Related Relief* [Docket No. 218] (the "Bar Date Order"). The Bar Date Order (a) established August 30, 2024, at 5:00 p.m. (prevailing Eastern Time) (the "General Bar Date") as the last day for creditors that are not governmental units to file proofs of claim, proofs of interest, and requests for payment of administrative expense claims under Bankruptcy Code section 503(b)(9); (b) established November 29, 2024 at 5:00 p.m. (prevailing Eastern Time) (the "Governmental Bar Date") as the last day for creditors that are governmental units to file proofs of claim, proofs of interest, and requests for payment of administrative expense claims under Bankruptcy Code section 503(b)(9); and (c) approved a form of bar date notice, proof of claim form, and other related procedures.

A. The Plan and Injunctions

9. 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. The Plan became effective on June 1, 2025 (the "Effective Date"). *See* Docket No. 1016.

10. In accordance with the Plan, the GUC Trust was formed on the Effective Date. 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 without limitation filing this Objection to the Latham Claim. *See* Plan, Art. VIII § J.

11. The Plan provides that, except as expressly provided in the Plan, all Entities who have held, hold, or may hold claims that have been released, discharged, or are subject to exculpation are permanently enjoined, from and after the Effective Date, from, among other things, "commencing or continuing in any manner any action or other proceeding of any kind on account of or in connection with or with respect to any such claims" and "enforcing, attaching, collecting, or recovering by any manner or means any judgment, award, decree, or order against such Entities on account of or in connection with or with respect to any such claims." Plan, Art. X.F. Article X.F also bars any enjoined party from pursuing a claim or cause of action of any kind against the Debtors or the GUC Trustee relating to the Chapter 11 Cases—including "the administration of the Plan or property to be distributed under the Plan [or] the administration of the GUC Trust"—unless and until this Court first determines, after notice and a hearing, that the claim is colorable and specifically authorizes its prosecution. *Id.* (collectively, the "Plan Injunction").

12. The Plan also approved the detailed procedures governing the liquidation of unliquidated personal injury claims. *See* Plan, Art. VIII.J; *Unliquidated Claim Procedures* [D.I. 731] (the "Unliquidated Claim Procedures"). All potentially allowable unliquidated Class 6A and Class 6B claims seeking recovery for personal injury, wrongful death, or other harm—including the Latham Claim—are subject to the Unliquidated Claim Procedures. Unliquidated Claim Procedures ¶¶ 1–2. Under the Plan and Confirmation Order, claimholders subject to the Unliquidated Claim Procedures "shall be enjoined from commencing or continuing any action or proceeding in any manner or any place, including the Bankruptcy Court, seeking to establish,

liquidate, collect on, or otherwise enforce the Unliquidated Claim(s) other than through these Unliquidated Claim Procedures" (the "Unliquidated Claim Procedures Injunction"). *Id.* ¶ 3.

B. The Latham Claim and Ms. Latham's Conduct

13. The Latham Claim asserts one unsecured personal injury claim against LaVie Care Centers, LLC, in the amount of $500,000,000.00. The Latham Claim was filed without any documentation or backup support for the amount asserted. A true and correct copy of the Latham Claim is attached to the Remington Declaration as Exhibit A. Using the information provided by Ms. Latham in the Latham Claim, the GUC Trustee has reviewed available books and records of the Debtors and nothing therein indicates that Ms. Latham has a valid claim of any kind in these cases.

14. Following the filing of the Latham Claim, Ms. Latham reached out to counsel to the GUC Trustee for a general status update in March 2026. In response, counsel to the GUC Trustee responded appropriately, noting that any distribution on account of Class 6B claims would be likely 6-12 months away. A true and correct copy of this correspondence is attached to the Remington Declaration as Exhibit B.

15. In May 2026, counsel to the GUC Trustee further responded to a few of Ms. Latham's emails, which sought immediate payment of $500,000,000.00 and then $700,000,000.00 and referenced a sealing order on the docket of these Chapter 11 Cases that Ms. Latham asserted entitled her to a distribution. Counsel responded that either the sealing order did not grant Ms. Latham entitlement to any distribution, noted that the GUC Trustee was still reviewing claims, or requested that Ms. Latham include adequate information in any future email so the GUC Trustee can appropriately respond to the inquiries. A true and correct copy of two examples of this correspondence is attached to the Remington Declaration as Exhibit C.

16. Since these initial exchanges, Ms. Latham has orchestrated a pattern of harassment against the GUC Trustee and its counsel that continues today. As of the filing of this Objection, Ms. Latham has sent *over 110 emails* to Ms. Remington, counsel to the GUC Trustee, as well as additional emails to the GUC Trustee and other attorneys at Troutman Pepper Locke LLP, including Mrs. Kovsky-Apap and Mr. Brooks. Most emails demand an immediate deposit of at least $500 million—and sometimes up to $2 billion—into Ms. Latham's bank account, precisely what the Plan Injunction and the Unliquidated Claim Procedures Injunction prohibit. When Ms. Latham did not immediately receive her direct deposit of at least $500 million dollars from the GUC Trustee, Ms. Latham's email correspondence turned aggressive, hostile, and threatening.[2] True and correct copies of certain email extracts from Ms. Latham are attached to the Remington Declaration as Exhibit D. These communications include:

- On July 9, 2026, Ms. Latham emailed Ms. Remington a screenshot of the public docket in these Chapter 11 Cases showing a certificate of service and an interim sealing order with respect to the GUC Trustee's D&O action, saying "Tory look because i can read and see disrespectful a** h**."

- On July 23 and July 24, 2026, Ms. Latham sent numerous emails to Mr. Brooks and Ms. Remington telling them to "Close the case and send me my money stop harassing the owner with ya'll disrespectful a****," and "Tell the investors to pull out i don't want them in my ALF HR got they money contact their lawyer not the owner it's one account and this is slander so I'm keeping most of that f*** them. ."

- On July 25, 2026, Ms. Latham emailed Mr. Brooks, and Ms. Remington telling us to "Just place all the remaining amount in the same Vystar account I'm the new owner. They injured me. And pay the other bills close it."

- On July 28, 2026, Ms. Latham emailed Ms. Remington saying "b**** hurry up with my deposit send everything left and your fired sorry a** lawyer go back to

[2] In addition, Ms. Latham has appeared to represent to certain third parties that counsel to the GUC Trustee either (i) represents Ms. Latham or (ii) has agreed to provide her with at least $500 million dollars. Counsel to the GUC Trustee received an email from a cash advance company that referenced counsel to the GUC Trustee as Ms. Latham's "client." Counsel to the GUC Trustee responded to this outreach to clarify that the GUC Trustee does not represent Ms. Latham or the Debtors. Ms. Latham's response was similarly egregious, calling counsel to the GUC Trustee a "liar" and a "b*itch." A copy of this email correspondence is discussed in the Remington Declaration and attached thereto as Exhibit H and Exhibit I.

school." That same day, Ms. Latham emailed Mr. Brooks and Ms. Remington stating "f*** each other and send me my money.";

- On July 31, 2026, Ms. Latham emailed Mr. Brooks and Ms. Remington saying "No other person Latham only my name is on my business them not my parents I'm a hostage and forced adoption I'm from London"

- On August 3, 2026, Ms. Latham emailed Ms. Remington and several third parties, including individuals with Vystar and JPM Chase, stating the following: "don't ever think you took my position I've worked them all i own the all these businesses don't you ever try me in no life I'll hide you about me i don't want them positions your doing my work it's called delegation y'all slow and fired . The Global entrapranure resilience officer y'all are intraprrenure y'all work in my businesses. Im putting the position on Indeed nem. I need a loyal team i graduated from Harvard Business and some of y'all lied you would know this. I don't care who you are I'm your boss you don't like it clock out and hit the block stop playing on my clock."

- On October 15, 2026, Ms. Latham emailed Ms. Remington and asserted the Latham Claim in the amount of $1.2 billion dollars, stating "1.2 billion dollars now tell these people something again about me and I'm waiting for my money. I'll ask for the whole 15 billion stop playing with me like I'm slow I own the bank my house messed up I don't want it in not fixing it now lie again and you'll be jobless."; and

- On October 24, 2026, at 11:42 p.m. (ET), Ms. Latham emailed Ms. Remington and certain third parties stating "When this is over I want y'all to work from home and get tf off of my job I'm not giving a employee anything extra after this disrespectful and playing with my intelligence I want y'all to loose everything because I'm going to show you were you had me f***** up, f*** you and your family.." The subject line of this email was "F*** your family and eat my d***." That same evening, Ms. Latham again emailed Ms. Remington, saying "That goes for any employees at any job you don't like me I don't give af you don't like your pay find a new job now house that h** I hate y'all maggot a****.. hurry up get off of my clock and die.. and y'all fired stupid b*******.. I'm not your family and I don't need y'all you need me find a new family get out of my family s*** since y'all better than us.." The subject line remained the same.

- The next morning, at 2:08 a.m. (ET) on October 25, 2026, with the same subject line of "F*** your family eat my d***," Ms. Latham stated the following: "Ain't no more bonus or raise unless it's required by law I hate y'all dumb stupid a** employees I'll never claim y'all broke a** again hurry up and die off of my clock. I want to spit in your face and s*** in your caskets.. and go to h*** I don't want y'all in my heaven.." At 2:15 a.m. (ET) that same morning, Ms. Latham further emailed Ms. Remington to say "Now go find y'all own family you maggots.. I hate y'all work slaves my new word for y'all f****** peasants.."

17. At one point, Ms. Latham even threatened counsel to the GUC Trustee, causing Troutman Pepper Locke LLP to initiate certain security protocols in the offices in which Ms. Remington and Mr. Brooks sit to protect them. A true and correct copy of this threat is attached to the Remington Declaration as Exhibit E.

18. Ms. Latham's hostile and threatening correspondence has also extended beyond remarks against and about the undersigned counsel—including this Court:

- On August 4, 2026, Ms. Latham emailed Mr. Brooks, and Ms. Remington with a subject line "F*** you" and stating "Tell the judge on this case hurry up and suck a d*** because he's fired after this all y'all get the fuck away from my shit for insabornation [*sic*] since you can't read." That same day, Ms. Latham further emailed Mr. Brooks and Ms. Remington, with the same subject line, saying "long as it took y'all to send me my check f*** him the fake ones been off get out of my court house and this all y'all last case y'all slow if you work there and think i like you I hate y'all dumb a**** got me waiting for my money i hope he die."

19. A true and correct copy of that email correspondence is attached to the Remington Declaration as Exhibit F.

20. Apart from certain limited responses (including responses to third parties necessitated by Ms. Latham's false representations), counsel to the GUC Trustee has not responded to Ms. Latham's continued harassment—both because doing so would consume estate resources otherwise available to unsecured creditors and out of concern for counsel's own safety.

RELIEF REQUESTED

21. Through this Objection and Motion, the GUC Trustee requests that the Court (i) disallow and expunge the Latham Claim in its entirety, (ii) find that Ms. Latham has violated, and enforce against her, the Plan Injunction and the Unliquidated Claim Procedures Injunction, including by barring her from seeking payment on the Latham Claim once disallowed, and (iii) prohibit Ms. Latham from contacting the GUC Trustee or its professionals other than through filings with the Court.

BASIS FOR RELIEF REQUESTED

A. The Latham Claim should be disallowed and expunged in its entirety.[3]

22. Section 502(a) of the Bankruptcy Code provides, in pertinent part, that a "claim or interest, proof of which is filed under section 501 of this title, is deemed allowed, unless a party in interest . . . objects." 11 U.S.C. § 502(a). Once an objection to a claim is filed, the Court, after notice and a hearing, shall determine the allowed amount of the claim. *See* 11 U.S.C. § 502(b). When asserting a proof of claim against a bankrupt estate, a claimant must allege facts that, if true, would support a finding that the debtor is legally liable to the claimant. *In re Allegheny Int'l, Inc.*, 954 F.2d 167, 173 (3d Cir. 1992). Where the claimant alleges sufficient facts to support its claim, its claim is afforded prima facie validity. Fed. R. Bankr. P. 3001(f); *In re Allegheny Int'l Inc.*, 954 F.2d at 173. A party wishing to dispute such a claim must produce evidence in sufficient force to negate the claim's prima facie validity. *In re Allegheny Int'l Inc.*, 954 F.2d at 173–74. In practice, the objecting party must produce evidence that would refute at least one of the allegations essential to the claim's legal sufficiency. *Id.* Once the objecting party produces such evidence, the burden shifts back to the claimant to prove the validity of his or her claim by a preponderance of the evidence. *Id.*; *see also Dollinger v. BV Retail, LLC (In re S&Q Shack, LLC)*, Nos. 09-67151-MGD, 09-68410-MGD, 2015 Bankr. LEXIS 1166, at *6-7 (Bankr. N.D. Ga. Feb. 13, 2015). The burden of persuasion is always on the claimant. *See In re Moss*, No. 94-11959, 1995 WL 17005342, at *1 (Bankr. S.D. Ga. Sept. 28, 1995).

[3] Independent of the GUC Trustee's request to disallow the Latham Claim on the grounds it lacks sufficient detail and is not entitled to *prima facie* validity, the Unliquidated Claim Procedures contemplate disallowing the Latham Claim. Under those procedures, if a party fails to comply with the Unliquidated Claim Procedures or to cooperate as necessary to effectuate them, the Court may, after notice and a hearing, find such conduct to be in violation of the Confirmation Order, or an abandonment of or failure to prosecute the claim, or both, and may "disallow and expunge the Unliquidated Claim, in whole or part, or grant such other or further remedy deemed just and appropriate under the circumstances, including, without limitation, awarding attorneys' fees, other fees, and costs to the other party." Unliquidated Claim Procedures ¶ 33.

23. The Latham Claim fails at every step: It is not entitled to prima facie validity, and Ms. Latham has not carried and cannot carry her ultimate burden of proving that any Debtor owes her anything.

24. *First*, the Latham Claim is facially deficient. *Prima facie* validity is not automatic. It attaches only to a proof of claim signed and filed in accordance with the Bankruptcy Rules, and only where the claimant alleges facts that, if true, would support a finding that the debtor is legally liable to the claimant. *In re Allegheny Int'l, Inc.*, 954 F.2d at 173. The proof of claim form Ms. Latham used expressly instructed her to state the basis of her claim, to attach documents supporting the claim, and, if such documents were not available, to explain why in an attachment. *See* Latham Claim at 1–2. Ms. Latham did none of these things. The Latham Claim does not identify the nature of any injury, when or where any injury occurred, which of the Debtors' facilities (if any) was involved, any act or omission by any Debtor, or any legal theory under which any Debtor could be liable. It attaches no medical records, incident reports, pleadings, demand letters, or other documentation of any kind, and it offers no explanation for their absence. *Id.* It seeks $500,000,000.00 without any itemization, calculation, or explanation.[4] These are not technical deficiencies. Without them, neither the GUC Trustee nor the Court can determine whether the Debtors owe Ms. Latham anything at all.

25. *Second*, even if the Latham Claim were entitled to *prima facie* validity (and it is not), it should still be disallowed and expunged. The GUC Trustee has reviewed the Debtors' books and records and has been unable to identify any record of any incident, injury, litigation, or

[4] Ms. Latham's own correspondence further undermines the credibility of the Latham Claim. As discussed more fully in the Remington Declaration and Exhibit G attached thereto, Ms. Latham has asserted that she owns one or more Debtor, Shiftmed, Inc., Rescare and Suwannee Corrections, Chanel Inc., Troutman Pepper Locke LLP, and potentially Birkina Beauty. Ms. Latham has also stated she is Tory Burch, the fashion designer. Nothing in the record suggests that Ms. Latham holds any ownership or management interest in any Debtor or these third parties.

other liability owed to Ms. Latham. *See* Remington Decl. ¶¶ 5–6. That showing amply negates any presumption of validity. And Ms. Latham has declined every opportunity to cure these deficiencies. When counsel to the GUC Trustee responded to Ms. Latham's early inquiries, counsel specifically asked her to include adequate information in future correspondence so that the GUC Trustee could respond appropriately. *See* Remington Decl. Ex. C. Her subsequent correspondence contains no legitimate facts about any injury, any facility, or any basis for liability—only demands for payment, insults, and threats against counsel and third parties or assertions that Ms. Latham owns various companies. *See* Remington Decl. Exs. D–G.

26. The Latham Claim should therefore be disallowed and expunged in its entirety.

B. The Plan Injunction and Unliquidated Claim Procedures Injunction prohibits Ms. Latham's conduct.

27. Ms. Latham has blatantly violated both the Plan Injunction and the Unliquidated Claim Procedures Injunction on numerous occasions.[5] The Plan Injunction[6] provides, in relevant part:

> [A]ll Entities who have held, hold, or may hold claims or interests . . . are permanently enjoined, from and after the Effective Date, from taking any of the following actions against, as applicable, the Debtors, the Reorganized Debtors, the Exculpated Parties, or the Released Parties: (1) commencing or continuing in any manner any action or other proceeding of any kind on account of or in connection with or with respect to any such claims or interests; (2) enforcing, attaching, collecting, or recovering by any manner or means any judgment, award, decree, or order against such Entities on account of or in connection with or with respect to any such

[5] As a threshold matter, both injunctions apply squarely to Ms. Latham and the Latham Claim. The Latham Claim is a prepetition general unsecured claim (though not *prima facie* valid) that may be satisfied, if at all, only through Distributions from the GUC Trust, and only if and to the extent it becomes an Allowed Claim. *See* Plan, Arts. V.F, VIII.J.2, X.C. The Plan Injunction therefore applies. And because the Latham Claim is an unliquidated claim that, on its face, seeks recovery for a "[p]ersonal injury," the Unliquidated Claim Procedures Injunction applies as well. *See* Unliquidated Claim Procedures ¶¶ 1–3.

[6] Ms. Latham is bound by the Plan. 11 U.S.C. § 1141(a); *see United Student Aid Funds, Inc. v. Espinosa*, 559 U.S. 260, 275 (2010) (acknowledging that a confirmed plan binds the debtor and every creditor, whether or not the creditor accepted the plan).

> claims or interests; . . . and (5) commencing or continuing in any manner any action or other proceeding of any kind on account of or in connection with or with respect to any such claims or interests released or settled pursuant to the Plan.
>
> No enjoined party may commence, continue, or otherwise pursue . . . a Claim or Cause of Action of any kind against the Debtors, the GUC Trustee, the Exculpated Parties, the Released Parties, or the Debtor Professionals that relates to or is reasonably likely to relate to any act or omission in connection with, relating to, or arising out of . . . the Chapter 11 Cases, including, but not limited to, . . . the administration of the Plan or property to be distributed under the Plan, the administration of the GUC Trust . . . .

Plan, Art. X.F. No Distribution may be made on account of a Disputed Claim unless and until it becomes an Allowed Claim. Plan, Arts. V.F, VIII.J.2. The Unliquidated Claim Procedures Injunction, in turn, provides:

> Pursuant to the Plan and Confirmation Order, each Unliquidated Claimant (and any other person or entity that asserted an interest in the relevant Unliquidated Claim) shall be enjoined from commencing or continuing any action or proceeding in any manner or any place, including the Bankruptcy Court, seeking to establish, liquidate, collect on, or otherwise enforce the Unliquidated Claim(s) other than through these Unliquidated Claim Procedures . . . .

Unliquidated Claim Procedures ¶ 3.

28. Ms. Latham's violations are well documented. She has demanded on numerous occasions that counsel must remit at least $500 million dollars—and sometimes more—to her personal bank account. *See* Remington Decl. Exs. D–F. Each demand is an effort to recover on the Latham Claim outside the Plan and the Unliquidated Claim Procedures, in violation of both injunctions.

29. The Court should therefore find that Ms. Latham has violated the Plan Injunction and the Unliquidated Claim Procedures Injunction, and should enforce both by (i) directing her to cease all efforts to obtain payment on account of the Latham Claim other than through the Plan and the Unliquidated Claim Procedures, and (ii) permanently bar her, upon disallowance, from

seeking any payment on account of the Latham Claim from the GUC Trust, the GUC Trustee, or its counsel. The Unliquidated Claim Procedures expressly authorize the Court, upon a claimant's failure to comply, to find such conduct in violation of the Confirmation Order, to disallow and expunge the claim, and to award "attorneys' fees, other fees, and costs to the other party." Unliquidated Claim Procedures ¶ 33. The Court likewise may hold a party in civil contempt for violating a plan injunction where, as here, there are no fair grounds for doubt that the conduct was barred. *See Taggart v. Lorenzen*, 587 U.S. 554, 560–62 (2019); *Jove Eng'g, Inc. v. IRS*, 92 F.3d 1539, 1553–54 (11th Cir. 1996) (section 105(a) authorizes bankruptcy courts to impose civil contempt sanctions). Enforcing the injunctions, however, addresses only *what* Ms. Latham may demand. It does not address *how* she has chosen to make those demands.

C. This Court should prohibit Ms. Latham from communicating with the GUC Trustee and its professionals.

30. Section 105(a) of the Bankruptcy Code provides that the Court "may issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title," and that no provision of the Bankruptcy Code shall be construed to preclude the Court from "taking any action or making any determination necessary or appropriate to enforce or implement court orders or rules, or to prevent an abuse of process." 11 U.S.C. § 105(a). The Supreme Court has recognized that section 105(a) confers "broad authority" on bankruptcy courts to take any action necessary or appropriate to prevent an abuse of process. *Marrama v. Citizens Bank of Mass.*, 549 U.S. 365, 375 (2007). The Court's authority under section 105(a) is complemented by its inherent power to manage its proceedings and to protect the integrity of the judicial process and the parties before it. *See Chambers v. NASCO, Inc.*, 501 U.S. 32, 43–46 (1991). Courts in this Circuit and elsewhere have long recognized that, where a litigant's conduct becomes abusive and harassing, a court may enter carefully tailored injunctive relief restricting that conduct, so long as the litigant

retains meaningful access to the court. *See Procup v. Strickland*, 792 F.2d 1069, 1073–74 (11th Cir. 1986) (en banc); *In re Martin-Trigona*, 737 F.2d 1254, 1262 (2d Cir. 1984).

31. Ms. Latham's conduct leaves no doubt that such relief is warranted. What began in March 2026 as a request for a status update has devolved into a sustained campaign of abuse directed at the GUC Trustee's counsel, sent at all hours and from at least two different email accounts. *See* Remington Decl. Exs. B, D–G.

32. The communications identified in, and attached to, the Remington Declaration are reprehensible, and they are escalating—from insults, to wishes that counsel and others "die," to declarations that Ms. Latham wants counsel to "loose everything" and wants to "spit in [counsel's] face and s*** in [counsel's] caskets." Ms. Latham even threatened counsel to the GUC Trustee, and such threat was serious enough that counsel's law firm initiated security protocols in the offices where Ms. Remington and Mr. Brooks work. *See* Remington Decl. Ex. E. Ms. Latham's abuse extends to this Court. *See* Remington Decl. Ex. F. No fiduciary or professional should have to endure such conduct as a cost of administering a bankruptcy estate.

33. The harassment also drains the GUC Trust. Every email from Ms. Latham must be reviewed by professionals whose fees are paid from assets that would otherwise go to holders of Allowed Claims. *See* Plan, Art. VI.L.3. This Objection and Motion adds to that cost. And engagement has proved futile: Counsel's early, courteous responses and request for clarity produced only escalating demands and abuse. *See* Remington Decl. Exs. B–F. Absent an order of this Court, there is every reason to believe Ms. Latham's conduct will continue—and escalate.

34. The requested relief is narrowly tailored. The Proposed Order bars Ms. Latham from contacting, directly or indirectly—by email, telephone, text message, social media, mail, in person, or through any third party acting at her direction—the GUC Trustee and its professionals

and requires that any further communications be made exclusively through filings with the Court. Ms. Latham remains free to be heard by filing papers with the Court, including any response to this Objection and Motion, and will continue to receive notice of filings relating to the Latham Claim, if any. She loses nothing to which she is legitimately entitled; she simply may no longer use the claims process as a vehicle to harass, insult, and threaten the GUC Trustee and its professionals. And because an order is only as effective as its enforcement, the Proposed Order provides that any violation may be punished as contempt, including through monetary sanctions. *See Jove Eng'g*, 92 F.3d at 1553–54.

35. Even under the traditional standard for injunctive relief, every factor favors the GUC Trustee. The GUC Trustee is likely to succeed—indeed, has succeeded—in demonstrating that the Latham Claim should be disallowed and that Ms. Latham has violated the Plan Injunction and the Unliquidated Claim Procedures Injunction. Absent relief, the GUC Trustee's counsel will continue to suffer threats and abuse that money cannot remedy, and the GUC Trust will continue to incur needless administrative expense. The balance of harms tips decidedly in the GUC Trustee's favor because the order impairs no legitimate right of Ms. Latham. And the public interest is served by protecting the orderly administration of these Chapter 11 Cases, the integrity of this Court's orders, and the safety of the professionals who appear before it. The Court should grant the requested relief.

RESERVATION OF RIGHTS

36. The GUC Trustee hereby reserves all rights to further object to the Latham Claim or address any response to this Objection and Motion at any hearing.

NOTICE

37. The GUC Trustee will provide notice of the Objection to: (a) the U.S. Trustee; (b) counsel to the Debtors; and (c) Ms. Latham. The GUC Trustee submits that no further notice is required.

COMPLIANCE WITH OMNIBUS CLAIM OBJECTION PROCEDURES AND LOCAL RULE 3007-1

38. To the best of the GUC Trustee's knowledge and belief, this Objection materially complies with the Omnibus Claim Objection Procedures, to the extent it applies, and Local Rule 3007-1, as may be modified by the Omnibus Claim Objection Procedures. To the extent that the Objection does not comply with the Omnibus Claim Objection Procedures, to the extent it applies, or Local Rule 3007-1, as may be modified by the Omnibus claim Objection Procedures, the GUC Trustee submit that the deviations are immaterial and respectfully request that those requirements be waived.

WHEREFORE, the GUC Trustee respectfully requests that the Court enter the Proposed Order (i) disallowing and expunging the Latham Claim in its entirety; (ii) finding that Ms. Latham has violated, and enforcing against her, the Plan Injunction and the Unliquidated Claim Procedures Injunction, and (iii) prohibiting Ms. Latham from contacting the GUC Trustee and its professionals other than through filings with the Court; and (iv) granting such other and further relief as the Court deems just and proper.

Dated: November 4, 2026

TROUTMAN PEPPER LOCKE LLP

/s/ Tori L. Remington

Mathew R. Brooks (GA ID No. 378018)
600 Peachtree Street, NE, Suite 3000
Atlanta, GA 30308
Telephone: 404.885.3901
Email: matthew.brooks@troutman.com

-and-

Deborah Kovsky-Apap (admitted *pro hac vice*)
875 Third Avenue
New York, NY 10022
Telephone: 212.704.6000
Email: deborah.kovsky@troutman.com

-and-

Tori L. Remington (admitted *pro hac vice*)
Hercules Plaza
1313 N. Market Street, Suite 1000
Wilmington, DE 19801
Telephone: 302.777.6500
Email: tori.remington@troutman.com

Counsel for 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
	)	
	)	Case No. 24-55507-PMB
LAVIE CARE CENTERS, LLC, *et al.*[7]	)	
	)	(Jointly Administered)
Debtors.	)	
	)	**Re: D.I. _____**
	)	
	)	

ORDER DISALLOWING AND EXPUNGING THE LATHAM CLAIM, ENFORCING THE PLAN INJUNCTION AND UNLIQUIDATED CLAIM PROCEDURES INJUNCTION AGAINST MS. LATHAM, AND BARRING MS. LATHAM FROM CONTACTING THE GUC TRUSTEE AND ITS PROFESSIONALS

Upon consideration of the omnibus objection and motion [____] (the "Objection" and "Motion")[8] filed by the GUC Trustee on November 4, 2026, seeking to disallow and expunge the Latham Claim, enforce the Plan Injunction and Unliquidated Claim Procedures Injunction against Ms. Latham, and bar Ms. Latham from contacting the GUC Trustee and its professionals; and the

[7] 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.

[8] Capitalized terms not defined herein are defined in the Objection and Motion.

Court having jurisdiction over the Objection and Motion pursuant to 28 U.S.C. §§ 1334 and 157(b), the Objection and Motion being a core matter pursuant to 28 U.S.C. § 157(b)(2), the Court having found that venue of this proceeding and the Objection and Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Objection and Motion is in the best interests of the Debtors' estates, their creditors, residents and other parties in interest; and the Court being able to enter a final order consistent with Article III of the United States Constitution; and the GUC Trustee having filed a notice setting the deadline to respond to the Objection and Motion on December 4, 2026; and having set a hearing on the Objection and Motion on December 10, 2026, at 1:30 p.m. (ET) (the "Hearing"); and the Court having found that notice of the Objection and Motion and opportunity for hearing on the Objection and Motion were appropriate under the circumstances and no other notice need be provided; and the Court having reviewed and considered any response to the Objection and Motion; and having found that the legal and factual bases set forth in the Objection and Motion and at the Hearing establish just cause for the relief granted herein; and after due deliberation thereon; and good and sufficient cause appearing therefor, it is hereby ORDERED that:

1. The Objection is **SUSTAINED** as set forth herein. The Latham Claim is hereby disallowed and expunged in its entirety.

2. The Motion is **GRANTED** as set forth herein. Ms. Latham's repeated demands that the GUC Trustee and its counsel pay her on account of the Latham Claim constitute (a) efforts to collect or recover, by any manner or means, on account of the Latham Claim outside the Plan, in violation of the Plan Injunction, and (b) efforts to collect on or otherwise enforce an Unliquidated Claim other than through the Unliquidated Claim Procedures, in violation of the Unliquidated Claim Procedures Injunction.

3. The Plan Injunction and the Unliquidated Claim Procedures Injunction are hereby enforced against Ms. Latham. Ms. Latham shall cease, and is enjoined from, any effort to obtain payment on account of the Latham Claim other than through the Plan and the Unliquidated Claim Procedures. Because the Latham Claim is disallowed, Ms. Latham is permanently enjoined from seeking or demanding any payment, directly or indirectly, on account of the Latham Claim from the GUC Trust, the GUC Trustee, or counsel to the GUC Trustee.

4. The Court further finds that Ms. Latham's communications to the GUC Trustee's counsel, as well as her vulgar remarks directed at this Court, are threatening and harassing, serve no legitimate purpose in the administration of these Chapter 11 Cases, and constitute an abuse of process warranting relief under section 105(a) of the Bankruptcy Code.

5. Pursuant to section 105(a) of the Bankruptcy Code and Article XI.A of the Plan, Ms. Latham, and any person acting on her behalf or at her direction, are prohibited from contacting, directly or indirectly, the GUC Trustee, its employees, agents, and professionals (including but not limited to Troutman Pepper Locke LLP and its attorneys and staff), by any means whatsoever, including by email, telephone, text message, voicemail, mail, courier, social media, or in person, and from causing or encouraging any third party to do so.

6. Any further communication by Ms. Latham regarding the Latham Claim, the GUC Trust, or these Chapter 11 Cases shall be made exclusively by filing a written paper with the Court on the docket of these Chapter 11 Cases. Nothing in this Order precludes Ms. Latham from filing papers with the Court, appearing at any hearing in accordance with applicable rules, or receiving notice of filings relating to the Latham Claim, if any. The GUC Trustee and its counsel shall not be required to respond to any communication made in violation of this Order.

7. Any violation of this Order may be punished by the Court as contempt, including through the imposition of monetary sanctions, an award of the attorneys' fees and costs incurred by the GUC Trustee in addressing such violation, and such other relief as the Court deems appropriate, after notice and an opportunity to be heard. The GUC Trustee may seek such relief by motion on not less than seven (7) days' notice to Ms. Latham.

8. The GUC Trustee, its team members, and counsel to the GUC Trustee are authorized to take all actions necessary to effectuate the relief granted pursuant to this Order.

9. The claims register in the Chapter 11 Cases may be revised to comport with this Order.

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 Objection and Motion, including on Ms. Latham by first-class mail at the address listed on the Latham Claim, and a certificate of service confirming such service shall be filed promptly thereafter.

11. This Court shall retain jurisdiction over all affected parties with respect to any matters, claims, or rights arising from or related to the implementation, interpretation, and enforcement of this Order, including the imposition of sanctions for any violation hereof.

END OF DOCUMENT

Prepared and Presented by:

TROUTMAN PEPPER LOCKE LLP

By: */s/ Tori L. Remington*
Mathew R. Brooks (GA ID No. 378018)
600 Peachtree Street, NE, Suite 3000
Atlanta, GA 30308
Telephone: 404.885.3901
Email: matthew.brooks@troutman.com

-and-

Deborah Kovsky-Apap (admitted *pro hac vice*)
875 Third Avenue
New York, NY 10022
Telephone: 212.704.6000
Email: deborah.kovsky@troutman.com

-and-

Tori L. Remington (admitted *pro hac vice*)
Hercules Plaza
1313 N. Market Street, Suite 1000
Wilmington, DE 19801
Telephone: 302.777.6500
Email: tori.remington@troutman.com

Attorneys for the GUC Trustee