

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION**
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In re:	Chapter 11
Landmark Holdings of Florida, LLC,	Case No. 2:25-bk-00397
Landmark Management Services of Florida, LLC,	Case No. 2:25-bk-00398
Landmark Rehabilitation Hospital of Columbia, LLC,	Case No. 2:25-bk-00399
Landmark Hospital of Athens, LLC,	Case No. 2:25-bk-00400
Landmark Hospital of Cape Girardeau, LLC,	Case No. 2:25-bk-00401
Landmark Hospital of Columbia, LLC,	Case No. 2:25-bk-00402
Landmark Hospital of Joplin, LLC,	Case No. 2:25-bk-00403
Landmark Hospital of Savannah, LLC,	Case No. 2:25-bk-00404
Debtors. ¹	(Joint Administration Requested)

**DEBTORS' MOTION PURSUANT TO FED. R. BANKR. P. 1015(b)
FOR ENTRY OF AN ORDER DIRECTING JOINT
ADMINISTRATION OF RELATED CHAPTER 11 CASES**

The above-captioned debtors and debtors-in-possession (collectively, the “Debtors”), by their undersigned counsel, file this motion (the “Motion”) for entry of an order, the proposed form of which is attached as Exhibit A, pursuant to section 105 of Title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), Rule 1015(b) of the Federal Rules of

¹ The Debtors in these cases, along with the last four digits of each Debtor’s federal tax identification number, are: Landmark Holdings of Florida, LLC (1217); Landmark Management Services of Florida, LLC (7031); Landmark Rehabilitation Hospital of Columbia, LLC (5424); Landmark Hospital of Athens, LLC (2745); Landmark Hospital of Cape Girardeau, LLC (1155); Landmark Hospital of Columbia, LLC (5424); Landmark Hospital of Joplin, LLC (9493); and, Landmark Hospital of Savannah, LLC (8003).

Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 1015-1 of the Local Rules of the United States Bankruptcy Court for the Middle District of Florida (the “Bankruptcy Local Rules”), directing the joint administration of their related chapter 11 cases (collectively, the “Cases”).

In support of this Motion, the Debtors submit as follows:

I. Relief Requested

4. By this Motion, the Debtors request entry of an order directing joint administration of these Cases for procedural purposes only. The Debtors request that the Court grant the relief requested herein without a hearing. The Debtors submit that the Court’s consideration of the relief requested herein without a hearing is not prejudicial to parties in interest.

5. Specifically, the Debtors request that the Court maintain one file and one docket for all of the jointly administered cases under the case of Landmark Holdings of Florida, LLC, and that case be administered under a consolidated caption as follows:

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In re:	Chapter 11
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	Jointly Administered With
Landmark Management Services of Florida, LLC,	Case No. 2:25-bk-00398
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Landmark Hospital of Columbia, LLC,	Case No. 2:25-bk-00402
Landmark Hospital of Joplin, LLC,	Case No. 2:25-bk-00403

Landmark Hospital of Savannah, LLC,
Debtors.¹

Case No. 2:25-bk-00404

6. Footnote 1 of the caption will set forth the Debtors' names and last four digits of each Debtor's tax identification number, as reflected in footnote 1 to this Motion.

7. The Debtors also request that a docket entry, substantially similar to the following, be entered on the docket in each of the Debtors' cases, other than the case of Landmark Holdings of Florida, LLC, to reflect the joint administration of these Cases:

Notice of Joint Administration of Cases. No further papers to be docketed in this case. All papers should be docketed in Case No. 2:25-bk-00397. An Order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure directing the procedural joint administration of these chapter 11 cases of Landmark Holdings of Florida, LLC; Landmark Management Services of Florida, LLC; Landmark Rehabilitation Hospital of Columbia, LLC; Landmark Hospital of Athens, LLC; Landmark Hospital of Cape Girardeau, LLC; Landmark Hospital of Columbia, LLC; Landmark Hospital of Joplin, LLC; and, Landmark Hospital of Savannah, LLC.

The docket in Case No. 2:25-bk-00397 should be consulted for all matters affecting these cases.

II. Jurisdiction, Venue and Predicates for Relief

8. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157(a)-(b) and 1334(b). Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b).

9. The predicates for the relief requested herein are section 105(a) of the Bankruptcy Code, Bankruptcy Rule 1015(b) and Bankruptcy Local Rule 1015-1.

III. Background

10. On the date hereof (the “Petition Date”), each of the Debtors filed with the Court its respective voluntary petition for relief under chapter 11 of the Bankruptcy Code, commencing the Cases. The Debtors continue to operate their businesses and manage their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

11. As of the date hereof, no trustee, examiner, or statutory committee of creditors has been appointed in these Cases.

12. As evidenced by the petitions filed by each of the Debtors, Landmark Holdings of Florida, LLC is the direct parent of each of the other Debtors.

IV. Basis for Relief Requested

13. Bankruptcy Rule 1015 governs the joint administration of chapter 11 cases. That rule provides in pertinent part:

(b) Cases Involving Two or More Related Debtors. If a joint petition or two or more petitions are pending in the same court by or against . . . (4) a debtor and an affiliate, the court may order a joint administration of the estates. Prior to entering an order the court shall give consideration to protecting creditors of different estates against potential conflicts of interest.

14. The Advisory Committee Note to Bankruptcy Rule 1015 recognizes that the joint administration of bankruptcy cases can promote expedience and cost-efficiency by “using a single docket for the matters occurring in the administration, including the listing of filed claims, the combining of notices to creditors of the different estates, and the joint handling of other purely administrative matters[.]” Advisory Committee Note to Fed. R. Bankr. P. 1015(b).

15. Joint administration is particularly appropriate when an affiliated group of corporations files for bankruptcy relief. *See* 9 Collier on Bankruptcy, ¶ 1015.03 (16th ed. 2025).

When closely related corporations file for relief under chapter 11, “the success of one affiliate’s reorganization effort may depend largely on the success of the other affiliate’s efforts.” *Id.*

16. Section 101(2) of the Bankruptcy Code defines an “affiliate” as:

(A) [an] entity that directly or indirectly owns, controls, or holds with power to vote, 20 percent or more of the outstanding voting securities of the debtor . . . [or]

(B) [a] corporation 20 percent or more of whose outstanding voting securities are directly or indirectly owned, controlled, or held with power to vote, by the debtor, or by an entity that directly or indirectly owns, controls, or holds with power to vote, 20 percent or more of the outstanding voting securities of the debtor

17. The broad definition of “affiliate” is designed “to help the bankruptcy court to administer economically and efficiently different estates with substantial interests in common.” *In re H&S Transp. Co., Inc.*, 55 B.R. 786, 791 (Bankr. M.D. Tenn. 1982) (quoting *In re Brookhollow Assocs.*, 435 F. Supp. 763, 766 (D. Mass. 1977), *aff’d*, 575 F.2d 1003 (1st Cir. 1978)).

18. As set forth above, debtor Landmark Holdings of Florida, LLC is the direct parent of each of the other Debtors. Accordingly, the Debtors are affiliates under section 101(2) of the Bankruptcy Code and applicable caselaw and their bankruptcy cases are appropriate for joint administration under Bankruptcy Rule 1015(b).

19. The Debtors further believe that joint administration of the Cases will allow the cases to be administered more effectively, expeditiously, and economically, and will not prejudice any creditors of the Debtors’ individual estates.

20. The Debtors anticipate that numerous notices, applications, motions, other pleadings, hearings, and orders in the Cases will affect all of them. The failure to jointly administer these cases would result in numerous duplicative pleadings filed in each case for each issue and

then served upon separate service lists. Such duplication of substantially identical documents would be wasteful and would unnecessarily overburden the Court with voluminous filings.

21. In contrast, joint administration of the Cases will permit the Clerk of the Court to utilize a single general docket for the chapter 11 cases. Additionally, joint administration will permit counsel for all parties-in-interest to include the Debtors' estates in a single caption on the documents served and filed in the chapter 11 cases, thus enabling parties in-interest in each of the Cases to be apprised of the various matters before the Court.

22. Finally, the rights of the respective creditors of each of the Debtors will not be adversely affected by joint administration of these cases since the relief sought herein is purely procedural and is in no way intended to substantively consolidate the Debtors or otherwise affect substantive rights of the parties. Creditors and other parties-in-interest will retain any claims or rights they may have against a particular estate. Therefore, the rights of parties-in-interest will not be prejudiced by entry of an order directing joint administration of these Cases.

23. Accordingly, the Debtors respectfully submit that joint administration of the within chapter 11 cases is appropriate and in the best interests of their estates.

V. Notice

24. The Debtors will serve notice of this Motion on (a) the U.S. Trustee; (b) the Internal Revenue Service; (c) all known creditors holding secured claims against the Debtors' estates; (d) those creditors holding the 20 largest unsecured claims against the Debtors' estates on a consolidated basis; and (e) all parties that have filed a request for service of filings pursuant to Bankruptcy Rule 2002.

VI. No Prior Request

25. No prior request for the relief sought in this Motion has been made to this Court or any other court.

WHEREFORE, the Debtors respectfully request entry of an Order granting the relief requested herein and such other and further relief as the Court may deem just and appropriate.

[Remainder of page intentionally left blank]

Fort Myers, Florida
Dated: March 9, 2025

Respectfully submitted,

/s/ Jamie Z. Isani

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*Proposed Counsel to the Debtors
and Debtors in Possession*

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION**

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Landmark Hospital of Joplin, LLC,	Case No. 2:25-bk-00403
Landmark Hospital of Savannah, LLC,	Case No. 2:25-bk-00404
Debtors. ¹	(Joint Administration Requested)

**ORDER PURSUANT TO FED. R. BANKR. P. 1015(b) DIRECTING
JOINT ADMINISTRATION OF RELATED CHAPTER 11 CASES**

THIS CASE came before the Court without a hearing for consideration of the *Debtors'* *Motion Pursuant to Fed. R. Bankr. P. 1015(b) for Entry of an Order Directing Joint Administration of Related Chapter 11 Cases* [Docket No. ____] (the "Motion")² of the Debtors, pursuant to

¹ The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number, are: Landmark Holdings of Florida, LLC (1217); Landmark Management Services of Florida, LLC (7031); Landmark Rehabilitation Hospital of Columbia, LLC (5424); Landmark Hospital of Athens, LLC (2745); Landmark Hospital of Cape Girardeau, LLC (1155); Landmark Hospital of Columbia, LLC (5424); Landmark Hospital of Joplin, LLC (9493); and, Landmark Hospital of Savannah, LLC (8003).

² Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Motion.

Bankruptcy Rule 1015(b), for entry of an order directing the joint administration of the Debtors' related Cases for procedural purposes only, as more fully set forth in the motion.

The Court having jurisdiction to decide the Motion and the relief requested therein in accordance with 28 U.S.C. §§ 157(a)-(b) and 1334(b); consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and notice of the Motion having been given as provided in the Motion, and such notice having been adequate and appropriate under the circumstances; and it appearing that no other or further notice of the Motion need be provided; and the Court having found and determined that the relief sought in the Motion and granted herein is in the best interest of the Debtors and their estates after taking into account the priority scheme of the Bankruptcy Code, and that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, the Court finds that joint administration of the Bankruptcy Cases is justified. Accordingly, it is

ORDERED

1. The Motion is **GRANTED** as specified herein.
2. The Cases shall be jointly administered by the Court. Landmark Holdings of Florida, LLC, case number 2:25-bk-00397 is designated as the "Lead Case." The Clerk of Court shall maintain a single case docket using the Lead Case number.
3. Nothing contained in this Order shall be deemed or construed as directing or otherwise affecting the substantive consolidation of any of the Cases.

4. Except as otherwise set forth below, all papers including, without limitation, motions, applications, notices, monthly operating reports, and orders shall be filed in the Lead Case and shall bear the following joint administration caption:

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Landmark Hospital of Joplin, LLC,	Case No. 2:25-bk-00403
Landmark Hospital of Savannah, LLC,	Case No. 2:25-bk-00404
Debtors. ¹	

5. Footnote 1 of the caption will set forth the Debtors' names and last four digits of each Debtor's tax identification number, as reflected in footnote 1 of the Motion.

6. The Clerk of Court shall docket this Order in each of the Bankruptcy Cases and give notice to all CM/ECF filers and PACER users that all future filings shall be filed and docketed in the Lead Case.

7. The Clerk of the Court shall post a notation substantially similar to the following on the docket of each of the Debtor's chapter 11 cases:

Notice of Joint Administration of Cases. No further papers to be docketed in this case. All papers should be docketed in Case No. 2:25-bk-00397. An Order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure directing the procedural joint administration of these chapter 11 cases of Landmark Holdings of Florida, LLC; Landmark Management Services of Florida, LLC; Landmark Rehabilitation Hospital of Columbia, LLC; Landmark Hospital of Athens, LLC; Landmark Hospital of Cape Girardeau, LLC; Landmark Hospital of Columbia, LLC; Landmark Hospital of Joplin, LLC; and, Landmark Hospital of Savannah, LLC.

The docket in Case No. 2:25-bk-00397 should be consulted for all matters affecting these cases.

8. The following papers shall be filed in the separate Bankruptcy Cases, captioned with the name and case number for that particular case:

- (a) list of creditors pursuant to Rule 1007(d) of the Bankruptcy Rules;
- (b) schedules and statements of financial affairs (and any amendments thereto);
- (c) claims and notices of transfer of claims (however, objections to claims shall be filed in the Lead Case and shall specify the jointly administered case to which the objection applies);
- (d) ballots (if separate plans are filed); and
- (e) motions for final decree.

9. Each of the jointly administered Debtors shall file separate monthly operating reports to be docketed in the Lead Case.

10. Papers and orders that pertain to one or more specific Debtor(s) shall be filed in the Lead Case; however, the caption of the paper or order shall designate the specific Debtor(s) to which the paper or order applies. The caption of the paper or order shall be in the following form:

**UNITED STATE BANKRUPTCY COURT
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In re: Landmark Holdings of Florida, LLC, Landmark Management Services of Florida, LLC, Landmark Rehabilitation Hospital of Columbia, LLC, Landmark Hospital of Athens, LLC, Landmark Hospital of Cape Girardeau, LLC, Landmark Hospital of Columbia, LLC, Landmark Hospital of Joplin, LLC, Landmark Hospital of Savannah, LLC, Debtors. ¹	Chapter 11 Case No. 2:25-bk-00397 Jointly Administered With Case No. 2:25-bk-00398 Case No. 2:25-bk-00399 Case No. 2:25-bk-00400 Case No. 2:25-bk-00401 Case No. 2:25-bk-00402 Case No. 2:25-bk-00403 Case No. 2:25-bk-00404
[Name of Specific Debtor] [Cased Number] Applicable Debtor.	

11. If creditors are added to the matrices of the jointly administered Debtors, counsel for the Debtors shall cause this Order to be served on all added creditors and file proof of such service in the Lead case.

12. This Order shall be effective immediately upon entry.

13. The Debtors are authorized to take all action necessary to carry out this Order.

14. Notice of the Motion as provided therein is good and sufficient notice.

15. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and/or enforcement of this Order.

Debtors counsel is directed to serve a copy of this Order on the parties which were provided notice pursuant to the Motion and file a proof of service within three days of entry of this Order.