

**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
	Jointly Administered With
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	

DEBTORS' EMERGENCY MOTION PURSUANT TO 11 U.S.C. §§ 105(a) AND 521, AND FED. R. BANKR. P. 1007(a) AND 2002(a) AND (f), FOR ENTRY OF AN ORDER (I) AUTHORIZING THE DEBTORS TO (A) FILE A CONSOLIDATED LIST OF CREDITORS IN LIEU OF A FORMATTED MATRIX (B) FILE A CONSOLIDATED LIST OF THE DEBTORS' TOP 20 UNSECURED CREDITORS (C) REDACT CERTAIN PERSONAL IDENTIFICATION INFORMATION FROM FILINGS (D) SERVE PARTIES BY EMAIL, AND (II) APPROVING OF THE MANNER AND FORM OF NOTIFYING CREDITORS OF THE COMMENCEMENT OF THESE CASES

Judge Delano will conduct the hearing on this motion by Zoom from Courtroom 6A, George C. Young Federal Courthouse, 400 W. Washington Street, Orlando, FL 32801, on **Thursday,**

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).

March 13, 2025, at 10:30 a.m. Eastern Time. Parties may attend the hearing by video or telephone via Zoom. PARTIES MAY NOT APPEAR IN PERSON AT THE FORT MYERS COURTHOUSE. Parties are directed to consult Judge Delano’s Procedures Governing Court Appearances regarding policies and procedures for attendance at hearings by video or telephone via Zoom, available at <https://www.flmb.uscourts.gov/judges/delano>. If you are unable to access the Court’s website, please contact the Courtroom Deputy at 813-301-5195 no later than 3:00 p.m. one business day before the date of the hearing.

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 sections 105 and 521 of Title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “Bankruptcy Code”), Rules 1007 and 2002(a) and (f) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 1007-1 of the Local Rules of the United States Bankruptcy Court for the Middle District of Florida (the “Local Rules”), (I) authorizing the Debtors to (A) maintain a consolidated list of creditors (the “Consolidated List of Creditors”) in lieu of a formatted mailing matrix, (B) file a consolidated list of the Debtors’ twenty (20) largest unsecured creditors (the “Consolidated Top 20 List”), (C) redact the addresses and email addresses of individuals that are the Debtors’ current and former employees, directors, interest holders, contractors, creditors, other parties in interest (including the Debtors’ current and former patients) and other individuals as necessary, and any other information required to be redacted, to the extent applicable or required by law, and (D) serve parties in interest by email, and (II) approving the manner and form of notifying creditors of the commencement of these chapter 11 cases (the “Cases”) and other information. In support of this Motion, the Debtors submit as follows:

I. Relief Requested

1. By this Motion, the Debtors request entry of an order (I) authorizing the Debtors to (A) file a consolidated list of creditors (the “Consolidated List of Creditors”) in lieu of a formatted mailing matrix, (B) file a consolidated list of the Debtors’ twenty (20) largest unsecured creditors

(the “Consolidated Top 20 List”), (C) redact the addresses and email addresses of individuals that are the Debtors’ current and former employees, directors, interest holders, contractors, creditors, other parties in interest (including the Debtors’ current and former patients) and other individuals as necessary, and any other information required to be redacted, to the extent applicable or required by law; and (D) serve parties in interest by email, and (II) approving the manner and form of notifying creditors of the commencement of these Cases and other information.

II. Jurisdiction, Venue and Predicates for Relief

2. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 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).

3. The predicates for the relief requested herein are sections 105(a) and 521 of the Bankruptcy Code, Bankruptcy Rule 1007(a) and 2002(a) and (f), and Local Rule 1007-1.

III. Background

4. On March 9, 2025 (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.

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

6. The Debtors own and operate five long-term acute care (“LTAC”) hospitals located in Missouri and Georgia. Debtor Landmark Management Services of Florida, LLC provides management services to a sixth LTAC hospital located in Florida that is not owned by the Debtors. The Debtors’ first hospital was opened in 2006. The Debtors’ hospitals provide critical care to

patients that require a higher level of care for a longer period of time than a typical hospital can provide.

7. The Debtors have filed these cases with the intention of continuing their operations in the ordinary course of business and seeking to reorganize their financial affairs. Additional information regarding the Debtors' business, capital structure, and the circumstances leading to the commencement of these chapter 11 cases is set forth in the *Debtors' Chapter 11 Case Management Summary* (the "Case Management Summary"), which is incorporated herein by reference.

8. As set forth in the Case Management Summary, there are eight (8) affiliated Debtor entities involved in these Cases. The Debtors have approximately \$70 million in assets and approximately \$86 million in liabilities. The Debtors estimate that they have over 300 creditors and other parties-in interest.

9. Concurrently with the filing of this Motion, the Debtors have filed an application to retain American Legal Claim Services, LLC ("ALCS") as their claims and noticing agent in these Cases. If that application is granted, ALCS will, among other things, (a) assist with the consolidation of the Debtors' records into an electronic creditor database (the "Consolidated Creditor List") and prepare creditor lists, (b) mail notices to the parties in such database, including the notice of commencement of these Cases (the "Notice of Commencement") and (c) undertake any other mailings directed by this Court or required under the Bankruptcy Code, Bankruptcy Rules or Local Rules.

IV. Basis for Relief Requested

A. Cause Exists to Authorize Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting a Formatted Mailing Matrix.

10. Pursuant to section 521 of the Bankruptcy Code, Bankruptcy Rule 1007(a)(1) and Local Rule 1007-1, a debtor is required to file with the petition a list of creditors or master mailing matrix and a list of creditors holding the twenty largest unsecured claims.

11. Permitting the Debtors to maintain a consolidated list of their creditors in electronic format only, in lieu of filing and uploading a creditor matrix, is warranted under the circumstances of these Cases. Because the Debtors have several hundred creditors, converting the Debtors' computerized information to a format compatible with the matrix requirements would be an unduly burdensome task and would greatly increase the risk and recurrence of error with respect to information already intact and maintained by the Debtors in the ordinary course.

12. After consulting with ALCS, the Debtors believe that preparing a consolidated list in the format or formats currently maintained in the ordinary course of business will be sufficient to permit ALCS to promptly provide notices to all applicable parties. Indeed, with the assistance of ALCS the Debtors will be prepared to provide parties in interest with a computer-readable consolidated list of creditors upon request (or in non-electronic form at such requesting party's sole cost and expense) and will be capable of undertaking all mailings for the Debtors required during the pendency of these Cases. The Debtors believe that maintaining their list of creditors in electronic format rather than preparing and filing a creditor matrix will maximize efficiency, increase accuracy, and reduce costs to the benefit of the Debtors' estates.

13. In light of the foregoing, the Debtors submit that the proposed maintenance of an electronic list of creditors by ALCS is warranted under the facts and circumstances present here, consistent with the applicable provisions of the Court's Local Rules.

B. Cause Exists to Authorize the Debtors to File a Consolidated Top 20 List.

14. Bankruptcy Rule 1007(d) provides that a debtor shall file “a list containing the name, address and claim of the creditors that hold the 20 largest unsecured claims, excluding insiders.” This list is primarily used by the U.S. Trustee to evaluate the types and amounts of unsecured claims against a debtor and thus identify potential candidates to serve on an official committee of unsecured creditors appointed in debtors case pursuant to 1102 of the Bankruptcy Code.²

15. The Debtors submit that a single consolidated list of their combined 20 largest unsecured creditors in these Cases would be more reflective of the body of unsecured creditors that have the greatest stake in these Cases than separate lists for each of the Debtors. Therefore, the Debtors respectfully request authorization to file a single list of their 20 largest unsecured creditors in these Cases, which relief has been granted in other complex chapter 11 cases filed in this district. *See, e.g., In re Stein Mart, Inc.*, Case No. 3:20-bk-02387-JAF, Doc. No. 527 (Bankr. M.D. Fla. Oct. 9, 2020).

C. Cause Exists to Authorize the Debtors to Redact Certain Personal Information of Certain Third Parties.

16. Section 107(c)(1)(A) of the Bankruptcy Code provides that “the [Court], for cause, may protect an individual . . . to the extent the court finds that disclosure of such information would create undue risk of identity theft” with respect to “[a]ny means of identification . . . contained in a paper filed, or to be filed, in a case under the Bankruptcy Code.” Here, cause exists to authorize

² “The purpose of the separate list of 20 largest creditors required by this provision in the rules is to enable the clerk to identify members and the court to appoint immediately an unsecured creditors’ committee in compliance with 11 U.S.C. § 1102(a)(1).” *In re Dandy Doughboy Donuts, Inc.*, 66 B.R. 457, 458 (Bankr. S.D. Fla.1986); *see also* 9 Collier on Bankruptcy ¶ 1007.04 (Lawrence P. King, et al. eds., 16th ed. 2019) (“[T]he larger [unsecured creditor] list and information about the claims of the creditors on the list enables the United States trustee to determine the different types of claims existing in order to assure that a fully representative committee is appointed”)

the Debtors to redact the addresses and email addresses for individuals that are the Debtors' current and former employees, directors, interest holders, contractors, creditors, and other parties in interest (including the Debtors current and former patients), as necessary, and any other information required to be redacted, to the extent applicable or required by law, from the Consolidated Creditor List, and other filings made in these Cases because such information could be used to, among other things, perpetrate identity theft, and poses potential safety or privacy concerns. The Debtors have policies and practices in place to preserve the personally identifiable information of their employees, independent contractors, and patients, among other individuals, and intend to continue those policies and practices in these Cases in the ordinary course. The Debtors propose to provide, upon request, and subject to applicable data privacy and public health laws, unredacted versions of the Consolidated Creditor List to the Court, the Office of the United States Trustee for the Middle District of Florida, and counsel to any statutory committee of unsecured creditors appointed in these Cases.

D. Cause Exists to Authorize the Debtors to Serve Creditors by Email.

17. Although the Bankruptcy Rules generally require notices to be served on creditors at their addresses, they give significant latitude to bankruptcy courts for modifying the general rule. *See* Fed. R. Bankr. P. 2002(m) and 9007. Bankruptcy courts have explicit authority to modify the manner in which notice is given. *See* Fed. R. Bankr. P. 2002(m). The Debtors serve many of their patients, vendors, and workforce through online platforms and often communicate with them through electronic means. Accordingly, the Debtors request authority to serve their creditors by email, where an email account is available to the Debtors.

18. Not only is email service likely the most efficient and cost-effective manner by which service of all interested parties can be completed, it is also more likely to facilitate creditor

responses. In addition, this method of service will help alleviate administrative burdens and costs on the Debtors' estates.

19. The Debtors submit that implementation of the procedures requested herein are appropriate in these Cases and are well within the Court's equitable powers under section 105(a) of the Bankruptcy Code.

E. Cause Exists to Authorize the Debtors to Mail the Notice of Commencement.

20. Bankruptcy Rule 2002 establishes the general rule for notifying creditors in Cases. Specifically, Bankruptcy Rule 2002(a) states that "the clerk, or some other person as the court may direct, shall give the debtor, the trustee, all creditors and indenture trustees at least 21 days' notice by mail of . . . the meeting of creditors under § 341 or § 1104(b) of the [Bankruptcy] Code[.]" Fed. R. Bankr. P. 2002(a)(1). Bankruptcy Rule 2002(f) provides that such notice of the order for relief shall be sent by mail to all creditors. *See* Fed. R. Bankr. P. 2002(f).

21. The Debtors, through American Legal Claims Services, LLC ("ALCS"), their proposed claims and noticing agent, propose to serve the notice of commencement substantially in the form attached as Exhibit 1 to the Proposed Order (the "Notice of Commencement") to all parties entitled to notice of commencement of these Cases, to advise them of commencement of these Cases and the section 341 meeting of creditors. Service of the Notice of Commencement on the Consolidated Creditor List will not only prevent the Debtors' estates from incurring unnecessary costs associated with serving multiple notices to the parties listed on the Debtors' Consolidated Creditor List, but also preserve judicial resources and prevent creditor confusion through the efficient service of critical information. Accordingly, the Debtors submit that service of a single Notice of Commencement is warranted and proper in these Cases.

V. Notice

22. 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

23. 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 an emergency hearing on this Motion and 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 11, 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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In re:	Chapter 11
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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).

ORDER (I) AUTHORIZING THE DEBTORS TO (A) FILE A CONSOLIDATED LIST OF CREDITORS IN LIEU OF A FORMATTED MATRIX (B) FILE A CONSOLIDATED LIST OF THE DEBTORS' TOP 20 UNSECURED CREDITORS (C) REDACT CERTAIN PERSONAL IDENTIFICATION INFORMATION FROM FILINGS (D) SERVE PARTIES BY EMAIL, AND (II) APPROVING OF THE MANNER AND FORM OF NOTIFYING CREDITORS OF THE COMMENCEMENT OF THESE CASES

THIS CASE came on for consideration upon the motion [Docket No. ____] (the "Motion")² of the Debtors, pursuant to sections 105(a) and 521 of the Bankruptcy Code, Bankruptcy Rules 1007(a)(1) and (d) and 2002(a) and (f), and Local Rule 1007-1, for an order: (I) authorizing the Debtors to (A) maintain a consolidated list of creditors (the "Consolidated List of Creditors") in lieu of a formatted mailing matrix, (B) file a consolidated list of the Debtors' twenty (20) largest unsecured creditors (the "Consolidated Top 20 List"), (C) redact the addresses and email addresses of individuals that are the Debtors' current and former employees, directors, interest holders, contractors, creditors, and other parties in interest (including the Debtors' current and former patients), as necessary, and any other information required to be redacted, to the extent applicable or required by law, and (D) serve parties in interest by email; and (II) approving the manner and form of notifying creditors of the commencement of these Cases and other information; and 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); and 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 held a hearing to consider the relief requested in the Motion on March 13, 2025 (the "Hearing"); and upon the Chapter 11 Case Management Summary, the record of the Hearing,

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

and all of the proceedings had before the Court; 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, their respective estates and creditors, and all parties in interest, 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, it is hereby

ORDERED:

1. The Motion is GRANTED.
2. In lieu of submitting a formatted mailing matrix, the Debtors shall make available a single, consolidated list of all the Debtors' creditors in electronic form upon reasonable request by parties in interest.
3. The Debtors are authorized to file a consolidated list of their 20 largest unsecured creditors in lieu of each Debtor filing a list of its 20 largest unsecured creditors.
4. The Debtors are authorized to redact certain personally identifiable information in filings made in these Cases as more fully set forth in the Motion.
5. The Debtors, with the assistance of ALCS (upon this Court's authorization for the Debtors to engage ALCS as claims and noticing agent), are authorized to provide notice via email.
6. The Debtors, with the assistance of ALCS (upon this Court's authorization for the Debtors to engage ALCS as claims and noticing agent), are authorized to undertake all mailings directed by this Court, the U.S. Trustee, or required by the Bankruptcy Code, including the Notice of Commencement in the form attached hereto as Exhibit 1, and any other correspondence that the Debtors may wish to send to creditors.
7. On or before the date that is 21 days before the date on which the meeting of creditors required by section 341 of the Bankruptcy Code is to be held, the Debtors, with the

assistance of ALCS, shall mail the Notice of Commencement to all parties identified on the Debtors' list of creditors.

8. This Order shall be effective immediately upon entry.
9. The Debtors are authorized to take all action necessary to carry out this Order.
10. Notice of the Motion as provided therein is good and sufficient notice.
11. 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.

Exhibit 1 to Exhibit A

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

www.flmb.uscourts.gov

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Landmark Holdings of Florida, LLC,	Case No. 2:25-bk-00397
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Landmark Hospital of Savannah, LLC,	Case No. 2:25-bk-00404
Debtors. ¹	

**NOTICE OF COMMENCEMENT OF
CHAPTER 11 CASES AND MEETING OF CREDITORS**

Commencement of Chapter 11 Cases. On March 9, 2025, the above captioned debtors and debtors in possession (collectively, the “Debtors”), filed voluntary petitions for relief under Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (as amended, the “Bankruptcy Code”) in the United States Bankruptcy Court for the Middle District of Florida, Fort Myers Division (the “Court”).

Chapter 11 allows a debtor to reorganize or liquidate pursuant to a plan. A plan is not effective unless confirmed by the Bankruptcy Court. You may be sent a copy of a plan and a disclosure statement telling you about the plan, and you might have the opportunity to vote on the plan. You will be sent notice of the date of the confirmation hearing, and you may object to confirmation of the plan and attend the confirmation hearing. Unless a trustee is serving, the Debtors will remain in possession of the Debtors’ property and may continue to operate their business.

Joint Administration of Cases. Upon a motion by the Debtors, the Court entered an order on March 10, 2025 [Case No. 2:25-bk-00397, Docket No. 7] authorizing joint administration of the above-captioned cases pursuant to Rule 1015 of the Federal Rules of Bankruptcy Procedures (the “Bankruptcy Rules”) and Rule 1015-1 of the Local Rules of the United State Bankruptcy Court for the Middle District of Florida (the “Local Rules”), consolidating the cases for procedural purposes only under Case No. 2:25-bk-00397.

Meeting of Creditors. Pursuant to section 341 of the Bankruptcy Code, the Office of the United States Trustee for the Middle District of Florida (the “U.S. Trustee”) has scheduled a meeting of creditors **on April 15, 2025, at 11:00 a.m. (prevailing Eastern Time)**. The meeting will be telephonic. The conference line is (866)910-0293). The participant passcode is 7560574#. The Debtors’ representatives will be present at the meeting to be examined under oath by the U.S. Trustee and by creditors. Creditors are welcome to attend the meeting but are not required to do so. The meeting may be continued and concluded at a later date without further notice.

Creditors May Not Take Certain Actions. The filing of the bankruptcy petition automatically stays certain collection and other actions against the Debtors and the Debtors’ property. Prohibited actions are listed in section 362(a) of the Bankruptcy Code. For example, creditors are prohibited from: (a) contacting the Debtors to demand repayment; (b) taking action against the Debtors to collect money owed to creditors; (c) starting or continuing lawsuits against the Debtors; and (d) taking certain actions against property of the Debtors’ estates. *See* 11 U.S.C. § 362(a). If unauthorized actions are taken by a creditor against the Debtors, the Court may penalize that creditor. A creditor who is considering taking action against the Debtors or their property should review, among other things, section 362(a) of the Bankruptcy Code and seek legal advice.

Notice of Bar Dates for Proofs of Claim. The notice of the bar dates (the “Bar Date Notice”) will be mailed separately. The Bar Date Notice will contain information regarding the bar dates, a proof of claim form and instructions for completing and filing a proof of claim form.

Claims. A Proof of Claim is a signed statement describing a creditor’s claim. If a Proof of Claim form is not included with this Notice, you can obtain one at any Bankruptcy Court Clerk’s office. You may look at the schedules that have been, or will be, filed at the Bankruptcy Court Clerk’s office. If your claim is scheduled and is not listed as disputed, contingent, or unliquidated, it will be allowed in the amount scheduled, unless you filed a Proof of Claim or you are sent further notice about the claim. Whether or not your claim is scheduled, you are permitted to file a Proof of Claim. If your claim is not listed at all or if your claim is listed as disputed, contingent, or unliquidated, then you must file a Proof of Claim or you might not be paid any money on your claim and may be unable to vote on a plan. **The Bankruptcy Court has not yet set a deadline to file a Proof of Claim. If a deadline is set, you will be sent another notice.** A secured creditor retains rights in its collateral regardless of whether that creditor files a Proof of Claim. Filing a Proof of Claim may submit the creditor to the jurisdiction of the Bankruptcy Court, with consequences a lawyer can explain. For example, a secured creditor who files a Proof of Claim may surrender important nonmonetary rights, including the right to a jury trial. **Filing Deadline for a Creditor with a Foreign Address:** The deadline for filing claims will be set in a later Bankruptcy Court order and will apply to all creditors unless the order provides otherwise. If notice of the order setting the deadline is sent to a creditor at a foreign address, the creditor may

file a motion requesting the Bankruptcy Court to extend the deadline. There is no assurance that such a motion would be granted.

Receiving Notice. Any party in interest that desires to receive electronic mail notice in the chapter 11 cases and, consequently, be added to the service list, shall file with the Court a notice of appearance and request for service and shall serve such request on Hunton Andrews Kurth LLP, Riverfront Plaza, East Tower, 951 East Byrd Street, Richmond, Virginia 23219, Attn.: Justin F. Paget, Jennifer E. Wuebker, email: jpaget@hunton.com, jwuebker@hunton.com. All creditors will receive notice of certain proceedings, including, but not limited to, bar dates (unless applicable to a limited population of creditors), the time fixed for filing objections to and any hearing to consider a disclosure statement and/or confirmation of a chapter 11 plan and dismissal or conversion of the chapter 11 cases to another chapter of the Bankruptcy Code.

How to Obtain Documents. All documents filed with the Bankruptcy Court, including the Debtors schedules of assets and liabilities and statements of financial affairs, will be available for inspection at the Bankruptcy Court Clerk's office or by (a) accessing the Bankruptcy Court's website, www.flmb.uscourts.gov, (b) contacting the Bankruptcy Court Clerk's office by telephone at 813-310-5162 or by mail at U.S. Bankruptcy Court, 801 North Florida Avenue, Suite 555, Tampa, Florida, 33602 (c) by contacting the Debtors' notice, claims and balloting agent, American Legal Claims Services, LLC ("ALCS"), by telephone at 904-517-1442 or by mail at P.O. Box 23650, Jacksonville, Florida 32241, Attn: Jeffrey Pirrung, or (d) by accessing the website maintained by ALCS at <https://www.americanlegal.com/Landmark>.

Attorneys for Debtors. The attorneys representing the Debtors are Jamie Z. Isani, Hunton Andrews Kurth LLP, 333 SE 2nd Avenue, Suite 2400, Miami, Florida, Telephone: 305-810-2500; Email: jisani@hunton.com, and Justin F. Paget and Jennifer E. Wuebker, Hunton Andrews Kurth LLP, Riverfront Plaza, East Tower, 951 East Byrd Street, Richmond, Virginia 23219, Telephone: (804) 788-8200; Email: jpaget@hunton.com; jwuebker@hunton.com.

Discharge of Debts and Deadline to File a Complaint to Determine Dischargeability of Certain Debts. Confirmation of a chapter 11 plan may result in a discharge of debts, which may include all or part of your debt. *See* Bankruptcy Code § 1141(d). A discharge means that you may never try to collect the debt from the debtor, except as provided in the plan. If you believe that a debt owed to you is not dischargeable under § 1141(d)(6)(A) of the Bankruptcy Code, you must start a lawsuit by filing a complaint in the Court by [____], 2025. The Court Clerk's Office must receive the complaint and any required filing fee by such deadline.

Local Rule Dismissal Warning. Chapter 11 cases may be dismissed for failure to timely file lists, schedules, and statements. *See* Local Rule 1007-1.