

**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,	Jointly Administered With 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	

NOTICE OF (A) COMBINED HEARING ON APPROVAL OF DISCLOSURE STATEMENT AND CONFIRMATION OF PLAN AND (B) DEADLINE TO OBJECT TO DISCLOSURE STATEMENT AND CONFIRMATION OF PLAN

YOU ARE RECEIVING THIS NOTICE BECAUSE YOUR RIGHTS MAY BE AFFECTED BY THE PLAN. THEREFORE, YOU SHOULD READ THIS NOTICE CAREFULLY AND DISCUSS IT WITH YOUR ATTORNEY. IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT ONE.

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).

TO: ALL HOLDERS OF CLAIMS AGAINST AND INTERESTS IN LANDMARK HOLDINGS OF FLORIDA, LLC AND ITS AFFILIATED DEBTORS AND DEBTORS IN POSSESSION AND ALL OTHER PARTIES IN INTEREST IN THE ABOVE-CAPTIONED CHAPTER 11 CASES

PLEASE TAKE NOTICE THAT Landmark Holdings of Florida, LLC and its affiliated debtors and debtors in possession in the above-captioned chapter 11 cases (together, the “Debtors”), filed their (i) *Amended Joint Chapter 11 Plan For Landmark Holdings of Florida, LLC and Its Debtor Affiliates* [Docket No. 260] (as may be amended, supplemented, or modified from time to time, the “Plan”), and (ii) *Amended Disclosure Statement Accompanying Amended Joint Chapter 11 Plan For Landmark Holdings of Florida, LLC and Its Debtor Affiliates* [Docket No. 290] as may be amended, supplemented, or modified from time to time, the “Disclosure Statement”).² On **August 12, 2025**, the Bankruptcy Court entered an order [Docket No. 300] that, among other things, approved the Disclosure Statement on a conditional basis and established **September 15, 2025, at 4:30 p.m. (ET)** as the deadline for objecting to the adequacy of the disclosure statement and confirmation of the Plan (the “Objection Deadline”) and **September 22, 2025 at 10:00 a.m. (ET)** as the date and time of the hearing to consider confirmation of the Plan (the “Combined Hearing”).

If you wish to review the Plan, you may receive a copy of the Plan free of charge from American Legal Claims Services, LLC, the balloting agent retained by the Debtors in these chapter 11 cases, by: (i) phone at (904) 517-1444; (ii) visiting <https://www.americanlegal.com/Landmark>; or (iii) sending an email to Notice@americanlegalclaims.com with “Landmark Solicitation Inquiry” in the subject line. You may also obtain copies of any pleadings filed in these chapter 11 cases for a fee via PACER at: <https://www.flmb.uscourts.gov/>. Please be advised that American Legal Claims Services LLC is authorized to answer questions and provide additional copies of solicitation materials but may **not** advise you as to whether you should object to the Plan.

The Bankruptcy Court can confirm the Plan and bind all Holders of Claims and Interests if, after approval of the Disclosure Statement and the solicitation of votes to accept or reject the Plan, it is accepted by the Holders of at least two-thirds (2/3) in amount and more than one-half (1/2) in number of the Claims in each Voting Class who vote on the Plan and if the Plan otherwise satisfies the applicable requirements of section 1129(a) of the Bankruptcy Code. If the requisite acceptances are not obtained, the Bankruptcy Court nonetheless may confirm the Plan if it finds that the Plan (a) provides fair and equitable treatment to, and does not unfairly discriminate against, each Class rejecting the Plan and (b) otherwise satisfies the requirements of section 1129 of the Bankruptcy Code. If the Plan is confirmed by the Bankruptcy Court, it will be binding on all Holders of Claims and Equity Interests whether or not a particular Holder was entitled to vote, voted, or affirmatively voted to reject the Plan.

The Combined Hearing to consider the adequacy of the Disclosure Statement on a final basis and confirmation of the Plan will commence on and **September 22, 2025 at 10:00 a.m. (ET)**, before the Honorable Caryl E. Delano, Chief United States Bankruptcy Judge, in Courtroom 9A of the United States Bankruptcy Court for the Middle District of Florida, 801 N. Florida Avenue, Suite 555, Tampa, Florida 33602. Unless otherwise notified, Judge Delano will conduct

² Capitalized terms used but not defined herein have the meanings given to them in the Plan.

the Combined Hearing from Tampa Courtroom 9A. Parties may attend the hearing by video or telephone via zoom. UNLESS INSTRUCTED OTHERWISE, 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 Combined Hearing may be continued from time to time by the Bankruptcy Court or the Debtors without further notice other than by such adjournment being announced in open court or by a notice of adjournment filed with the Bankruptcy Court and served on such parties as the Bankruptcy Court may order. Moreover, the Plan may be modified or amended, if necessary, pursuant to section 1127 of the Bankruptcy Code, before, during or as a result of the Combined Hearing, without further notice to parties in interest.

CRITICAL INFORMATION REGARDING OBJECTING TO THE PLAN

ARTICLE VIII OF THE PLAN CONTAINS RELEASE, EXCULPATION, AND INJUNCTION PROVISIONS. YOU ARE ADVISED TO REVIEW AND CONSIDER THE PLAN CAREFULLY BECAUSE YOUR RIGHTS MIGHT BE AFFECTED THEREUNDER.

Objection Deadline. The deadline for filing objections to the adequacy of the Disclosure Statement or confirmation of the Plan is **September 15, 2025, at 4:30 p.m. (ET)**.

Any objection to the adequacy of the Disclosure Statement or confirmation of the Plan must: (a) be made in writing, (b) conform to the Bankruptcy Rules and the Local Rules (c) set forth the name of the objector and the nature and amount of any claim or interest asserted by the objector against or in the Debtors, (d) state with particularity the legal and factual basis for the objection, and (e) be filed with the Court and served so as to be **actually received** no later than the Objection Deadline by the parties listed below (the "Notice Parties"). OBJECTIONS NOT TIMELY FILED AND SERVED IN THE MANNER SET FORTH HEREIN MAY NOT BE CONSIDERED BY THE BANKRUPTCY COURT AND MAY BE OVERRULED WITHOUT FURTHER NOTICE.

- a. Counsel for the Debtors: Hunton Andrews Kurth LLP, 951 E. Byrd Street, Richmond, VA 23219 (Justin F. Paget, jpaget@hunton.com and Jennifer E. Wuebker, jwuebker@hunton.com);
- b. Counsel for Amerant: Stearns Weaver Miller Weissler Alhadeff & Sitterson, P.A., Museum Tower, Suite 2200, 150 West Flagler Street, Miami, FL 33130 (Patricia A. Redmond, predmond@stearnsweaver.com and jmartinez@stearnsweaver.com) and Garbett, Allen, Roza & Yates, P.A., Brickell City Tower, 80 S.W. Eighth Street, Suite 3100, Miami, FL 33130 (David S. Garbett, dgarbett@garlawfirm.com);
- c. Counsel for the DIP Lender (if any):

- d. The Office of the United States Trustee: 501 E. Polk Street, Suite 1200, Tampa, FL 33602 (Attn: Guy A. Van Baalen, guy.a.vanbaalen@usdoj.gov and Nathan Wheatley, nathan.a.wheatley@usdoj.gov); and
- e. Counsel for the Committee: Greenberg Traurig, LLP, 3333 Piedmont Road NE, Suite 2500, Atlanta, GA 30305 (John D. Elrod, elrodj@gtlaw.com and Allison J. McGregor, Allison.McGregor@gtlaw.com).

ADDITIONAL INFORMATION

ARTICLE VIII OF THE PLAN CONTAINS RELEASE, EXCULPATION AND INJUNCTION PROVISIONS. YOU SHOULD REVIEW THESE PROVISIONS CAREFULLY.