

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

GENESIS HEALTHCARE, INC., *et al.*,¹

Debtors.

Chapter 11

Case No. 25-80185 (SGJ)

(Jointly Administered)

Related Dkt. Nos. 577, 925, 926 & 954

**DECLARATION OF JACQUES G. BALETTE IN
SUPPORT OF MOTION OF CERTAIN HOLDERS OF PERSONAL
INJURY AND WRONGFUL DEATH CLAIMS FOR RELIEF FROM THE
AUTOMATIC STAY TO PURSUE CLAIMS AGAINST NON-DEBTOR DEFENDANTS**

I, Jacques G. Balette, hereby declare under penalty of perjury that the following is true and correct to the best of my knowledge, information, and belief:

1. I am a Partner with the law firm Marks, Balette, Young & Moss PLLC (“MBYM Law”). MBYM Law represents each member of the Ad Hoc Group of Holders of Personal Injury and Wrongful Death Claims (the “Ad Hoc Group”). *See* Verified Statement of the Ad Hoc Group of Holders of Personal Injury and Wrongful Death Claims Pursuant to Bankruptcy Rule 2019(c) (Dkt. No. 884). Each member of the Ad Hoc Group holds a “personal injury or wrongful death claims” against a Debtor within the meaning of 28 U.S.C. § 157(b)(2)(B).

2. I submit this Declaration in support of the *Motion of Certain Holders of Personal Injury and Wrongful Death Claims for Relief from the Automatic Stay to Pursue Claims against Non-Debtor Defendants* (Dkt. No. 577) (the “Lift Stay Motion”) and in opposition to the *Debtors’*

¹ The last four digits of Genesis Healthcare, Inc.’s federal tax identification number are 4755. There are 291 Debtors in these chapter 11 cases, which are being jointly administered for procedural purposes only. The location of Genesis Healthcare, Inc.’s corporate headquarters and the Debtors’ service address is 101 East State Street, Kennett Square, PA 19348.

Objection to Motion of Certain Holders of Personal Injury and Wrongful Death Claims for Relief From the Automatic Stay to Pursue Claims Against Non-Debtor Defendants (Dkt No. 925) (the “Debtors’ Lift Stay Objection”) filed on September 15, 2025.²

3. The Ad Hoc Group asserts that its members’ personal injury and wrongful death claims (based on injuries suffered by them and not the Debtors) that can be asserted by the members (and not the Debtors) under applicable state law outside of bankruptcy (and prior to the commencement of these cases) against non-debtors (that are not entitled to receive a discharge in these cases) under various legal doctrines (including alter ego, veil piercing, and successor liability) cannot treated as the Debtors’ property inside of bankruptcy.

4. The Lift Stay Motion was filed so that claimants could file, commence, or prosecute any cause of action against a party that is not a debtor in the Chapter 11 Cases (a “Non-Debtor Cause of Action”), including, without limitation, ReGen Healthcare, LLC, Career Staff, GEC Rehabilitation Services, Joel Landau, David Gefner, David Harrington, and John Randazzo, based on the rights, remedies, theories of liability and legal doctrines available to claimants under applicable state law immediately prior to the commencement of the Chapter 11 Cases, including, without limitation, negligent undertaking, the doctrine of successor liability, and the doctrines of alter ego and veil piercing (collectively, the “Claimants’ Rights and Remedies”).

5. I understand from the Debtors’ Lift Stay Objection that the Debtors have accused the movants under the Lift Stay Motion of seeking to continue litigation against the Debtors. The Debtors’ position is inaccurate and does not fairly confront the relief sought by the Lift Stay Motion. The chart attached as **Exhibit 1** identifies the potential non-debtor defendants that I believe, based on the information available at this time, can be held liable for the causes of action

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

that are owned by such movants under applicable state law. Many of the non-debtor defendants are liable based on their own negligent conduct.

6. Career Staffing and GEC Rehabilitative Services are directly liable non-debtor entities for the plaintiff's injuries. The plaintiffs' claims arise from the staffing and rehabilitative services that directly affected the patients' care, separate and apart from any alleged negligence by the nursing home Debtor. Career Staffing employed and/or placed nursing staff and nurse aides who provided day-to-day care to the patients, with duties to select, train, supervise, and deploy personnel capable of meeting applicable standards of care. Career Staffing bore independent duties to ensure that its personnel were qualified, supervised, and retained only if fit to render patient care in compliance with state laws, and to report any conditions or conduct that endangered patient safety to the appropriate state authorities. Similarly, GEC Rehabilitative Services (the rehabilitation company) recruited, trained, and supervised therapists and rehabilitation staff entrusted with the patients' treatment, and assumed duties to maintain licensure-compliant practices, ensure staff qualifications, monitor the quality of care, and correct deficiencies. Each entity's obligations to staff qualification, ongoing training, supervision, and regulatory compliance created a direct duty to the patient independent of the nursing home, such that the patient may pursue direct claims against these non-debtor entities for negligent training, supervision, failure to enforce required standards, and violations of applicable statutes and professional standards.

7. Other potential non-Debtor defendants include medical doctors, licensed nursing home administrators, and licensed nurses who are also liable for violations of their independent and non-delegable duties owed by virtue of their professional licenses and regulations governing their independent professional conduct. By reason of those licenses, they owe patients a professional duty to provide competent care in accordance with applicable medical board rules,

Nurse Practice Acts, licensure standards, and state regulations separate and apart from duties that were imposed on the Debtor-nursing home. While staff employed by the nursing home may owe duties arising from their employment (adherence to policies and the nursing home's directives), medical doctors, licensed facility administrators, and licensed nurses, operate under independent, non-delegable professional licenses and regulatory regimes designed to protect the health and safety of patients from unsafe conduct committed by these professionals. When a licensed professional's professional judgment or actions fall below those standards, resulting in patient harm, liability attaches to the individual practitioner personally regardless of the nursing home's conduct or the employer's involvement. These claims are grounded in the professionals' own duties and regulatory obligations. For example, in the *Alma Brown* matter (First Judicial District Court of Santa Fe New Mexico, Cause No. D-101-CV-2023-02447), the licensed facility administrator/executive director (Missy Seratt), and the Director of Nursing (Dedra Martin, RN) were named individually as Defendants by reason of their separate and independent violations of their professional licenses. The Debtor-nursing home, Debtor-related entities and these individual Non-Debtor Defendants entered into a settlement with Plaintiffs. With respect to these individual Non-Debtor Defendants, Plaintiffs seek an Order lifting stay for collection purposes from these Non-Debtors.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and correct to the best of my knowledge, information, and belief.

Dated: September 22, 2025

By: /s/ Jacques G. Balette

Name: Jacques G. Balette

Title: Partner

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic means via ECF transmission to all Pacer System participants in these bankruptcy cases on September 22, 2025.

/s/ Peter C. D'Apice

Peter C. D'Apice

EXHIBIT 1

Responsible Non-Debtors

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
1	No. D-101-CV-2023-02447 (New Mexico)	Alma Brown	• Clovis Healthcare and Rehabilitation Center, LLC d/b/a Clovis Healthcare and Rehabilitation Center • Genesis Administrative Services, LLC • FC-GEN Operations Investment, LLC • GEN Operations I, LLC • GEN Operations II, LLC • Genesis Healthcare, Inc. • Genesis Healthcare, LLC • Genesis Holdings, LLC • GHC Holdings, LLC • Genesis OMG Operations, LLC • HCCF Management Group XI, LLC • Senior Care Genesis, LLC • Senior Care Holdings, LLC • Sun Healthcare Group, Inc. • Sundance Rehabilitation Holdco, Inc.	• Zac Properties XI, LLC • Missy Seratt • Dedra Martin • Tiffany Bittick	• GEC Rehabilitative Services • Career Staffing • Jon Shrader, M, DO • Elaine Morrow • Welltower, Inc. • ReGen Healthcare • Joel Landau • David Harrington • John Randazzo • David Gefner • Pinta Capital Partners • WAX Dynasty Partners • Integra WIP Tenancy, LLC • DPE 88988, LLC

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
2	No. D-101-CV-2023-00518 (New Mexico)	Stella Lucero	• 3514 Fowler Avenue Operations, LLC d/b/a Silver City Care Center • Genesis Administrative Services, LLC • FC-GEN Operations Investment, LLC • GEN Operations I, LLC • GEN Operations II, LLC • Genesis Healthcare, Inc. • Genesis Healthcare, LLC • Genesis Holdings, LLC • GHC Holdings, LLC • Genesis OMG Operations, LLC • HCCF Management Group XI, LLC • Senior Care Genesis, LLC • Senior Care Holdings, LLC • Sun Healthcare Group, Inc. • Sundance Rehabilitation Holdco, Inc.	• Zac Properties XI, LLC • Rebecca Singleton • Tanya Marquez • Vanessa Sherman	• Genesis Eldercare Rehab Services • Career Staffing • Geetanjali, Dodson, MD • Bassam Al Mumsi, MD • Welltower, Inc. • ReGen Healthcare • Joel Landau • David Harrington • John Randazzo • David Gefner • Pinta Capital Partners • WAX Dynasty Partners • Integra WIP Tenancy, LLC • DPE 88988, LLC

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
3	No. D-608-CV-2023-00217 (New Mexico)	Yvonne Tellez- Ramirez	• 3514 Fowler Avenue Operations, LLC d/b/a Silver City Care Center • Genesis Administrative Services, LLC • FC-GEN Operations Investment, LLC • GEN Operations I, LLC • GEN Operations II, LLC • Genesis Healthcare, Inc. • Genesis Healthcare, LLC • Genesis Holdings, LLC • GHC Holdings, LLC • Genesis OMG Operations, LLC • HCCF Management Group XI, LLC • Senior Care Genesis, LLC • Senior Care Holdings, LLC • Sun Healthcare Group, Inc. • Sundance Rehabilitation Holdco, Inc.	• Zac Properties XI, LLC • Rebecca Singleton • Melanie Smith	• Genesis Eldercare Rehab Services • Career Staffing • Bassam Al Homsy, MD • Geetanjali, Dodson, MD • Welltower, Inc. • ReGen Healthcare • Joel Landau • David Harrington • John Randazzo • David Gefner • Pinta Capital Partners • WAX Dynasty Partners • Integra WIP Tenancy, LLC • DPE 88988, LLC

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
4	No. D-101-CV-2024-00441 (New Mexico)	Janet Copsy	• 3514 Fowler Avenue Operations, LLC d/b/a Silver City Care Center • Genesis Administrative Services, LLC • FC-GEN Operations Investment, LLC • GEN Operations I, LLC • GEN Operations II, LLC • Genesis Healthcare, Inc. • Genesis Healthcare, LLC • Genesis Holdings, LLC • GHC Holdings, LLC • Genesis OMG Operations, LLC • HCCF Management Group XI, LLC • Senior Care Genesis, LLC • Senior Care Holdings, LLC • Sun Healthcare Group, Inc. • Sundance Rehabilitation Holdco, Inc.	• Zac Properties XI, LLC • Rebecca Singleton	• Genesis Eldercare Rehab Services • Career Staffing • Geetanjali, Dodson, MD • Bassam Al Homs, MD • Welltower, Inc. • ReGen Healthcare • Joel Landau • David Harrington • John Randazzo • David Gefner • Pinta Capital Partners • WAX Dynasty Partners • Integra WIP Tenancy, LLC • DPE 88988, LLC

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
5	No. D-101-CV-2024-01833 (New Mexico)	Manuel Salaiz	• 3514 Fowler Avenue Operations, LLC d/b/a Silver City Care Center • Genesis Administrative Services, LLC • FC-GEN Operations Investment, LLC • GEN Operations I, LLC • GEN Operations II, LLC • Genesis Healthcare, Inc. • Genesis Healthcare, LLC • Genesis Holdings, LLC • GHC Holdings, LLC • Genesis OMG Operations, LLC • HCCF Management Group XI, LLC • Senior Care Genesis, LLC • Senior Care Holdings, LLC • Sun Healthcare Group, Inc. • Sundance Rehabilitation Holdco, Inc.	• Zac Properties XI, LLC • Rebecca Singleton	• Genesis Eldercare Rehab Services • Career Staffing • Geetanjali Dodson, DO • Bassam Al Homsy, MD • Rebecca Georgia Smelser • Welltower, Inc. • ReGen Healthcare • Joel Landau • David Harrington • John Randazzo • David Gefner • Pinta Capital Partners • WAX Dynasty Partners • Integra WIP Tenancy, LLC • DPE 88988, LLC

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
6	No. D-101-CV-2024-01827 (New Mexico)	Gloria Quintana	• 3514 Fowler Avenue Operations, LLC d/b/a Silver City Care Center • Genesis Administrative Services, LLC • FC-GEN Operations Investment, LLC • GEN Operations I, LLC • GEN Operations II, LLC • Genesis Healthcare, Inc. • Genesis Healthcare, LLC • Genesis Holdings, LLC • GHC Holdings, LLC • Genesis OMG Operations, LLC • HCCF Management Group XI, LLC • Senior Care Genesis, LLC • Senior Care Holdings, LLC • Sun Healthcare Group, Inc. • Sundance Rehabilitation Holdco, Inc.	• Zac Properties XI, LLC • Rebecca Singleton	• Genesis Eldercare Rehab Services • Career Staffing • Geetanjeli Dodson, DO • Bassam Al Homsy, MD • Kimberly Hall, NP • Rebecca Georgia Smelser • Welltower, Inc. • ReGen Healthcare • Joel Landau • David Harrington • John Randazzo • David Gefner • Pinta Capital Partners • WAX Dynasty Partners • Integra WIP Tenancy, LLC • DPE 88988, LLC

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
7	No. D-101-CV-2025-00174 (New Mexico)	Esther Monje	• 3514 Fowler Avenue Operations, LLC d/b/a Silver City Care Center • Genesis Administrative Services, LLC • FC-GEN Operations Investment, LLC • GEN Operations I, LLC • GEN Operations II, LLC • Genesis Healthcare, Inc. • Genesis Healthcare, LLC • Genesis Holdings, LLC • GHC Holdings, LLC • Genesis OMG Operations, LLC • HCCF Management Group XI, LLC • Senior Care Genesis, LLC • Senior Care Holdings, LLC • Sun Healthcare Group, Inc. • Sundance Rehabilitation Holdco, Inc.	• Zac Properties XI, LLC • Rebecca Singleton	• Genesis Eldercare Rehab Services • Career Staffing • Geetanjali Dodson, DO • Jane Frances Shiti, FNP • Bassam Al Homs, MD • Welltower, Inc. • ReGen Healthcare • Joel Landau • David Harrington • John Randazzo • David Gefner • Pinta Capital Partners • WAX Dynasty Partners • Integra WIP Tenancy, LLC • DPE 88988, LLC

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
8	No. D-101-CV-2025-00148 (New Mexico)	Don Arrington	• 3514 Fowler Avenue Operations, LLC d/b/a Silver City Care Center • Genesis Administrative Services, LLC • FC-GEN Operations Investment, LLC • GEN Operations I, LLC • GEN Operations II, LLC • Genesis Healthcare, Inc. • Genesis Healthcare, LLC • Genesis Holdings, LLC • GHC Holdings, LLC • Genesis OMG Operations, LLC • HCCF Management Group XI, LLC • Senior Care Genesis, LLC • Senior Care Holdings, LLC • Sun Healthcare Group, Inc. • Sundance Rehabilitation Holdco, Inc.	• Zac Properties XI, LLC • Rebecca Singleton	• Genesis Eldercare Rehab Services • Career Staffing • Geetanjali Dodson, DO • Jane Frances Shiti, FNP • Bassam Al Homs, MD • Welltower, Inc. • ReGen Healthcare • Joel Landau • David Harrington • John Randazzo • David Gefner • Pinta Capital Partners • WAX Dynasty Partners • Integra WIP Tenancy, LLC • DPE 88988, LLC

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
9	No. D-101-CV-2024-01209 (New Mexico)	Eloy Medina	• St. Catherine Healthcare and Rehabilitation Center, LLC d/b/a Bear Canyon Rehabilitation Center • Genesis Health Care, LLC • Genesis Healthcare, LLC • Genesis Healthcare, Inc. • Summit Care, LLC • FC-GEN Operations Investment, LLC • GEN Operations I, LLC • GEN Operations II, LLC • HCCF Management Group XI, LLC • Skilled Healthcare, LLC • Summit Care Parent, LLC • Sun Healthcare Group, Inc. • Sundance Rehabilitation Holdco, Inc.	• Welltower, Inc. • Zac Properties XI, LLC • Ebony Lampkin	• GEC Rehabilitative Services • Career Staffing • Bhupinder Walia, MD • Christian Morris, MD • Michelle Lovell • ReGen Healthcare • Joel Landau • David Harrington • John Randazzo • David Gefner • Pinta Capital Partners • WAX Dynasty Partners • Integra WIP Tenancy, LLC • DPE 88988, LLC

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
10	N/A (New Mexico)	Georgia Romero	N/A	N/A	• GEC Rehabilitative Services • Career Staffing • Maher Belmamoun, MD • Jennifer Pantoja, NP • Ryan Victor Villegas, DO • Licensed Administrator • Director of Nursing • Welltower, Inc. • Zac Properties XI, LLC • ReGen Healthcare • Joel Landau • David Harrington • John Randazzo • David Gefner • Pinta Capital Partners • WAX Dynasty Partners • Integra WIP Tenancy, LLC • DPE 88988, LLC

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
11	N/A (New Mexico)	Linda Medlock	N/A	N/A	• GEC Rehabilitative Services • Career Staffing • Kirby Gabrys, MD • Lisa Noya, MD • Amit Bhandari, MD • Nancy Greces, MD • Ashley Zurcher, NP • Linda Garcia, PA • Licensed Administrator • Director of Nursing • Welltower, Inc. • Zac Properties XI, LLC • ReGen Healthcare • Joel Landau • David Harrington • John Randazzo • David Gefner • Pinta Capital Partners • WAX Dynasty Partners

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
					• Integra WIP Tenancy, LLC • DPE 88988, LLC
12	N/A (New Mexico)	Ruben Montoya	N/A	N/A	• GEC Rehabilitative Services • Career Staffing • Thomas Wulf, MD • Dawn Wulf, NP • Licensed Administrator • Director of Nursing • Welltower, Inc. • Zac Properties XI, LLC • ReGen Healthcare • Joel Landau • David Harrington • John Randazzo • David Gefner • Pinta Capital Partners • WAX Dynasty Partners • Integra WIP Tenancy, LLC • DPE 88988, LLC

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
13	N/A (New Mexico)	Faustina Tinkham	N/A	N/A	• GEC Rehabilitative Services • Career Staffing • Attending Physician • Nurse Practitioner • Licensed Administrator • Director of Nursing • Welltower, Inc. • Zac Properties XI, LLC • ReGen Healthcare • Joel Landau • David Harrington • John Randazzo • David Gefner • Pinta Capital Partners • WAX Dynasty Partners • Integra WIP Tenancy, LLC • DPE 88988, LLC

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
14	N/A (New Mexico)	Adam Gomez	N/A	N/A	• GEC Rehabilitative Services • Career Staffing • Attending Physician • Nurse Practitioner • Licensed Administrator • Director of Nursing • Welltower, Inc. • Zac Properties XI, LLC • ReGen Healthcare • Joel Landau • David Harrington • John Randazzo • David Gefner • Pinta Capital Partners • WAX Dynasty Partners • Integra WIP Tenancy, LLC • DPE 88988, LLC

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
15	No. D-101-CV-2024-00380 (New Mexico)	Johnny Chewiwi	• Canyon Transitional Rehabilitation Center, LLC d/b/a Canyon Transitional Rehabilitation Center • Genesis Administrative Services, LLC • Summit Care, LLC • Summit Care Parent, LLC • Skilled Healthcare, LLC • Genesis Healthcare, LLC • Genesis Healthcare, Inc. • FC-GEN Operations Investment, LLC • GEN Operations I, LLC • GEN Operations II, LLC • HCCF Management Group XI, LLC • Senior Care Genesis, LLC • Sun Healthcare Group, Inc. • Sundance Rehabilitation Holdco, Inc.	• Welltower, Inc. • Zac Properties XI, LLC • Juanita K. Correa	• GEC Rehabilitative Services • Career Staffing • Devang Butani, MD • Bhupinder Walia, MD • ReGen Healthcare • Joel Landau • David Harrington • John Randazzo • David Gefner • Pinta Capital Partners • WAX Dynasty Partners • Integra WIP Tenancy, LLC • DPE 88988, LLC

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
16	N/A (New Mexico)	Sheila Leakey- O'Brien	N/A	N/A	• GEC Rehabilitative Services • Career Staffing • Attending Physician • Medical Director • Licensed Administrator • Director of Nursing • Welltower, Inc. • Zac Properties XI, LLC • ReGen Healthcare • Joel Landau • David Harrington • John Randazzo • David Gefner • Pinta Capital Partners • WAX Dynasty Partners • Integra WIP Tenancy, LLC • DPE 88988, LLC

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
17	Case No. 24-CI-01886 (Kentucky)	Janet Hadley	• Genesis Healthcare, LLC • Gensis Holdings, LLC • Sun Healthcare Group, Inc. • FC-Gen Ops I • FC-Gen Ops II • FC-Gen Operations, LLC • Harborside Healthcare Advisors, LP • Harborside Healthcare, LP • Harborside Healthcare, LLC • HCF Management Group XI, LLC • Sunbridge Healthcare, LLC • Sundance Rehabilitation Holdco, Inc. • HBR Kentucky, LLC • HBR Elizabethtown, LLC d/b/a Kensington Nursing and Rehabilitation Center a/k/a Kensington Center	• Welltower, Inc. • Zac Properties XI, LLC • Tony Mollika • Encore Health Partners, LLC • Encore Parent Holdings, LLC • Cassie Allen	• GEC Rehabilitative Services • Career Staffing • Achamma Itticheria, MD • Gregory McFall, NP • Rebecca Spicer, NP • Amy Feusner • ReGen Healthcare • Joel Landau • David Harrington • John Randazzo • David Gefner • Pinta Capital Partners • WAX Dynasty Partners • Integra WIP Tenancy, LLC • DPE 88988, LLC

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
18	24-CVS-3564 (North Carolina)	James Chavis	• Sunbridge Retirement Care Associates, LLC d/b/a Pembroke Center • Sunbridge Healthcare, LLC • FC Gen Operations Investment, LLC • Gen Operations I, LLC • Gen Operations II, LLC • Genesis Healthcare, Inc. • Genesis Healthcare, LLC • Gensis Holdings, LLC • HCCF Management Group XI, LLC • Sun Healthcare Group, Inc.	• Welltower, Inc. • Zac Properties XI, LLC • Dennis McKinney • Lincoln Locklear	• GEC Rehabilitative Services • Career Staff Unlimited • Career Staffing • James McGee, MD • Sheila Hunt, NP • Jamie Young, NP • ReGen Healthcare • Joel Landau • David Harrington • John Randazzo • David Gefner • Pinta Capital Partners • WAX Dynasty Partners • Integra WIP Tenancy, LLC • DPE 88988, LLC

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
19	N/A (Colorado)	Paul Baca	N/A	N/A	• GEC Rehabilitative Services • Career Staffing • Attending Physician • Medical Director • Licensed Administrator • Director of Nursing • Welltower, Inc. • ZAC Properties XI, LLC • ReGen Healthcare • Joel Landau • David Harrington • John Randazzo • David Gefner • Pinta Capital Partners • WAX Dynasty Partners • Integra WIP Tenancy, LLC • DPE 88988, LLC

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
20	Case ID: 240702133 (Pennsylvania)	Lorna Charles	• 1526 Lombard Streen SNF Operations II, LLC d/b/a Accelerated Skilled Nursing and Rehabilitation (Philadelphia) • Genesis HC, LLC • Genesis Healthcare, LLC • Genesis PM PA Operations, LLC • FC-Gen Operations Investment, LLC • Gen Operations I, LLC • Gen Operations II, LLC • Genesis Healthcare, Inc. • Gensis Holdings, LLC • GHC Holdings, LLC • HCCF Management Group XI, LLC • Sun Healthcare Group, Inc. • Sundance Rehabilitation Holdco, Inc.	• Welltower, Inc. • Zac Properties XI, LLC • Tina Larose	• Career Staff Unlimited • Career Staffing • Alignmed • Visavis Healthcare • Scott Joshowitz, MD • Mary Ann Esposito, MD • Kimberly Heckert, MD • Jessica Bechini, NP • Jacqueline Carroll, NP • Jilian Minott, NP • ReGen Healthcare • Joel Landau • David Harrington • John Randazzo • David Gefner • Pinta Capital Partners • WAX Dynasty Partners • Integra WIP Tenancy, LLC • DPE 88988, LLC

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
21	N/A (Pennsylvania)	Shearron Mitchell	N/A	N/A	• Welltower, Inc. • ZAC Properties XI, LLC • Career Staffing • Career Staff Unlimited • Alignmed • Visavis Healthcare • Longevity Health Plan • Paige Van Wirt, MD • Courtney Nace, NP • Tracy Young, NP • ReGen Healthcare • Joel Landau • David Harrington • John Randazzo • David Gefner • Pinta Capital Partners • WAX Dynasty Partners • Integra WIP Tenancy, LLC • DPE 88988, LLC

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
22	N/A (New Mexico)	Nicey Austin	N/A	N/A	• GEC Rehabilitative Services • Career Staffing • Lisa Noya, MD • Amit Bhandari, MD • Michelle Lovell, NP • Brandy Heaton, NP • Welltower, Inc. • Zac Properties XI, LLC • ReGen Healthcare • Joel Landau • David Harrington • John Randazzo • David Gefner • Pinta Capital Partners • WAX Dynasty Partners • Integra WIP Tenancy, LLC • DPE 88988, LLC

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
23	N/A (New Mexico)	Vikki Romo	N/A	N/A	• GEC Rehabilitative Services • Career Staffing • Andres Plaza, AMP • Diane Cummings, NP • Cassandra Edlund, NP • Jennifer Panoja, MD • Lisa Noya, MD • Amit Bhandari, MD • Ashley Zurcher, NP • Linda Garcia, NP • Destiny Keller, NP • Alexandria Salazar Webster, PA • • Welltower, Inc. • Zac Properties XI, LLC • ReGen Healthcare • Joel Landau • David Harrington

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
					• John Randazzo • David Gefner • Pinta Capital Partners • WAX Dynasty Partners • Integra WIP Tenancy, LLC • DPE 88988, LLC
24	N/A (New Mexico)	Andrea Dominguez	N/A	N/A	• GEC Rehabilitative Services • Career Staffing • Lisa Stolarczyk, MD • Steven Acosta, MD • Martha Anderson, NP • Devonna Johnson, NP • Victoria Odocha, NP • Kathleen L'Heureux, NP • Welltower, Inc. • Zac Properties XI, LLC • ReGen Healthcare • Joel Landau

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
					• David Harrington • John Randazzo • David Gefner • Pinta Capital Partners • WAX Dynasty Partners • Integra WIP Tenancy, LLC • DPE 88988, LLC
25	N/A (West Virginia)	Jerry Jones	N/A	N/A	• GEC Rehabilitative Services • Career Staffing • Medical Director • Attending Physician • Nurse practitioner • Licensed Administrator • Director of Nursing • Welltower, Inc. • Zac Properties XI, LLC • ReGen Healthcare • Joel Landau • David Harrington • John Randazzo • David Gefner

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
					• Pinta Capital Partners • WAX Dynasty Partners • Integra WIP Tenancy, LLC • DPE 88988, LLC
26	N/A (Virginia)	Emden Syres	N/A	N/A	• GEC Rehabilitative Services • Career Staffing • Medical Director • Attending Physician • Nurse practitioner • Licensed Administrator • Director of Nursing • Welltower, Inc. • Zac Properties XI, LLC • ReGen Healthcare • Joel Landau • David Harrington • John Randazzo • David Gefner • Pinta Capital Partners

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
					• WAX Dynasty Partners • Integra WIP Tenancy, LLC • DPE 88988, LLC
27	N/A (Virginia)	Laura Dinkins	N/A	N/A	• GEC Rehabilitative Services • Career Staffing • Medical Director • Attending Physician • Nurse practitioner • Licensed Administrator • Director of Nursing • Welltower, Inc. • Zac Properties XI, LLC • ReGen Healthcare • Joel Landau • David Harrington • John Randazzo • David Gefner • Pinta Capital Partners • WAX Dynasty Partners

#	Cause No. (State)	Plaintiff/Nursing Home Resident	Debtor Defendants	Non-Debtor Defendants	Potential Non- Debtor Defendants
					• Integra WIP Tenancy, LLC • DPE 88988, LLC