

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

AAC HOLDINGS, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 20-11648 (JTD)

(Jointly Administered)

**NOTICE OF MOTION OF DEBTORS FOR ENTRY OF AN ORDER (I) APPROVING  
THE ADEQUACY OF THE DISCLOSURE STATEMENT, (II) APPROVING THE  
SOLICITATION AND NOTICE PROCEDURES FOR CONFIRMATION OF THE  
DEBTORS' PLAN OF REORGANIZATION, (III) APPROVING BALLOT AND  
NOTICE FORMS IN CONNECTION THEREWITH, (IV) SCHEDULING CERTAIN  
DATES WITH RESPECT THERETO, AND (V) GRANTING RELATED RELIEF**

**PLEASE TAKE NOTICE** that the above-captioned debtors and debtors in possession (the "Debtors") filed the *Motion of Debtors for Entry of an Order (I) Approving the Adequacy of Information in the Disclosure Statement, (II) Approving the Solicitation and Notice Procedures, (III) Approving the Forms of Ballots and Notices in Connection Therewith, (IV) Scheduling Certain Dates With Respect Thereto, and (V) Granting Related Relief* (the "Motion") with the United States Bankruptcy Court for the District of Delaware (the "Bankruptcy Court") and the related Disclosure Statement and Plan.

---

<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: AAC Healthcare Network, Inc. (0677); AAC Dallas Outpatient Center, LLC (6827); AAC Las Vegas Outpatient Center, LLC (5381); Addiction Labs of America, LLC (1133); Behavioral Healthcare Realty, LLC (2055); BHR Aliso Viejo Real Estate, LLC (2910); BHR Oxford Real Estate, LLC (0023); BHR Ringwood Real Estate, LLC (0565); Forterus Health Care Services, Inc. (4758); Laguna Treatment Hospital, LLC (0830); New Jersey Addiction Treatment Center, LLC (7108); Oxford Outpatient Center, LLC (0237); Oxford Treatment Center, LLC (7853); Recovery First of Florida, LLC (3005); RI - Clinical Services, LLC (6291); River Oaks Treatment Center, LLC (0640); Sagenex Diagnostics Laboratory, LLC (7900); San Diego Addiction Treatment Center, Inc. (1719); Sober Media Group, LLC (4655); Solutions Treatment Center, LLC (8175); The Academy Real Estate, LLC (9789); AAC Holdings, Inc. (6142); ABTTC, LLC (7601); AdCare Criminal Justice Services, Inc. (1653); AdCare Hospital of Worcester, Inc. (3042); AdCare Rhode Island, Inc. (2188); AdCare, Inc. (7005); American Addiction Centers, Inc. (3320); B&B Holdings Intl LLC (8549); BHR Greenhouse Real Estate, LLC (4295); Clinical Revenue Management Services, LLC (8103); Concorde Real Estate, LLC (7890); Concorde Treatment Center, LLC (6483); Diversified Healthcare Strategies, Inc. (3809); FitRX, LLC (5410); Green Hill Realty Corporation (4951); Greenhouse Treatment Center, LLC (4402); Lincoln Catharine Realty Corporation (5998); Recovery Brands, LLC (8920); Referral Solutions Group, LLC (7817); Singer Island Recovery Center LLC (3015); TAJ Media LLC (7047); Tower Hill Realty, Inc. (0039); Grand Prairie Professional Group, P.A. (2102); Las Vegas Professional Group - Calarco, P.C. (5901); Oxford Professional Group, P.C. (8234); Palm Beach Professional Group, Professional Corporation (7608); Pontchartrain Medical Group, A Professional Corporation (1271); and San Diego Professional Group, P.C. (9334). The location of the Debtors' corporate headquarters is 200 Powell Place, Brentwood, TN 37027.

**PLEASE TAKE FURTHER NOTICE** that a hearing (the “Hearing”) to consider the relief sought in the Motion will be held on **August 31, 2020 at 11:00 a.m. prevailing Eastern Time** before the Honorable John Dorsey of the Bankruptcy Court, 824 Market Street, 5th Floor, Wilmington, Delaware 19801.

**PLEASE TAKE FURTHER NOTICE** that in accordance with Rule 3017(a) of the Federal Rules of Bankruptcy Procedure, requests for copies (to be provided free of charge) of the Motion, Disclosure Statement, Plan, and any other pleadings by parties in interest may be made to Donlin Recano & Company, Inc. (the “Notice and Claims Agent”) (a) by calling the Notice and Claims Agent toll free at (877) 476-4387; (b) by sending a written request sent to the Notice and Claims Agent at Donlin, Recano & Company, Inc., Re: AAC Holdings, Inc., et al., P.O. Box 199043, Blythebourne Station, Brooklyn, NY 11219; or (c) by sending an electronic request to the Notice and Claims Agent at [aacinfo@donlinrecano.com](mailto:aacinfo@donlinrecano.com). In addition, copies of the Motion, Disclosure Statement, Plan and any other pleadings are available to be viewed on the Internet at (a) <https://www.donlinrecano.com/Clients/aac/Index>; or (b) the Bankruptcy Court’s website (<http://www.deb.uscourts.gov>) by following the directions for accessing the ECF system on such website.

**PLEASE TAKE FURTHER NOTICE** that any response or objection to the entry of the order with respect to the relief sought in the Motion must be filed with the Bankruptcy Court on or before **August 24, 2020 at 4:00 p.m. prevailing Eastern Time** (the “Objection Deadline”).

**PLEASE TAKE FURTHER NOTICE** that all objections to the relief sought at the Hearing *must*: (a) be in writing; (b) conform to the Bankruptcy Rules, the Bankruptcy Local Rules, and any orders of the Bankruptcy Court; (c) state, with particularity, the legal and factual basis for the objection and, if practicable, a proposed modification to the Plan (or related materials) that would resolve such objection; *and* (d) be filed with the Bankruptcy Court (contemporaneously with a proof of service) and served upon the following parties so as to be *actually received* on or before the Objection Deadline:

***Counsel to the Debtors***

**Greenberg Traurig, LLP**

Dennis A. Meloro  
The Nemours Building  
1007 North Orange Street, Suite 1200  
Wilmington, Delaware 19801  
Telephone: (302) 661-7000  
Facsimile: (302) 661-7360  
Email: [melorod@gtlaw.com](mailto:melorod@gtlaw.com)

**Greenberg Traurig, LLP**

David B. Kurzweil  
Alison Elko Franklin  
Terminus 200  
3333 Piedmont Road, NE, Suite 2500  
Atlanta, Georgia 30305  
Telephone: (678) 553-2100  
Facsimile: (678) 553-2212  
Email: [kurzweild@gtlaw.com](mailto:kurzweild@gtlaw.com)  
[franklinae@gtlaw.com](mailto:franklinae@gtlaw.com)

***Counsel to the Official Committee of Unsecured Creditors  
Appointed in These Chapter 11 Cases***

**Cole Schotz P.C.**

Justin R. Alberto  
Andrew Roth-Moore  
500 Delaware Avenue Suite 1410  
Wilmington, DE 19801  
Telephone: (302) 652-3131  
Facsimile: (302) 652-3117  
Email: jalberto@coleschotz.com  
            aroth-moore@coleschotz.com

**Cole Schotz P.C.**

Seth Van Aalten  
Michael Trentin  
Anthony De Leo  
1325 Avenue of the Americas 19th Floor  
New York, NY 10019  
Telephone: (212) 752-8000  
Facsimile: (212) 752-8393  
Email: svanaalten@coleschotz.com  
            mtrentin@coleschotz.com  
            adeleo@coleschotz.com

***Counsel to the Ad Hoc Committee of Certain Senior Lenders  
and Junior Lenders and the DIP Lenders***

**Stroock & Stroock & Lavan LLP**

Sayan Bhattacharyya  
Daniel A. Fliman  
180 Maiden Lane  
New York, New York 10038  
Email: sbhattacharyya@stroock.com  
            dfliman@stroock.com

**Young Conaway Stargatt & Taylor, LLP**

Matthew B. Lunn  
Robert Poppiti  
Rodney Square, 1000 North King Street  
Wilmington, DE 19801  
Email: mlunn@ycst.com  
            rpoppiti@ycst.com

***Counsel to the Prepetition Agents and the DIP Agent***

**Richards, Layton & Finger, P.A.**

Mark D. Collins  
Amanda R. Steele  
One Rodney Square  
920 North King Street  
Wilmington, DE 19801  
Email: collins@rlf.com  
            steele@rlf.com

**Kilpatrick Townsend & Stockton LLP**

Todd C. Meyers  
1100 Peachtree Street NE  
Suite 2800  
Atlanta, GA 30309-4528  
Email: tmeyers@kilpatricktownsend.com

- and -

Todd C. Meyers  
Gianfranco Finizio  
Kelly E. Moynihan  
1114 Avenue of the Americas  
New York, NY 10036  
Email: gfinizio@kilpatricktownsend.com  
            kmoynihan@kilpatricktownsend.com

***U.S. Trustee***

Attn: Rosa Sierra  
Office of the United States Trustee for the District of Delaware  
844 King Street  
Wilmington, DE 19801

**PLEASE TAKE FURTHER NOTICE** that if you fail to respond in accordance with this notice, the Bankruptcy Court may grant the relief requested by the motion without further notice or hearing.

**PLEASE TAKE FURTHER NOTICE** that the Hearing may be continued from time to time without further notice other than the announcement of the adjourned date(s) at the Hearing or any continued hearing.

**PLEASE TAKE FURTHER NOTICE THAT THIS NOTICE IS NOT A SOLICITATION OF VOTES TO ACCEPT OR REJECT THE PLAN. VOTES ON THE PLAN MAY NOT BE SOLICITED UNLESS AND UNTIL THE PROPOSED DISCLOSURE STATEMENT IS APPROVED BY AN ORDER OF THE BANKRUPTCY COURT.**

Dated: July 24, 2020

**GREENBERG TRAURIG, LLP**

/s/ David B. Kurzweil

David B. Kurzweil (admitted *pro hac vice*)  
Alison Elko Franklin (admitted *pro hac vice*)  
Terminus 200  
3333 Piedmont Road, NE, Suite 2500  
Atlanta, Georgia 30305  
Telephone: (678) 553-2100  
Facsimile: (678) 553-2212  
Email: kurzweild@gtlaw.com  
franklinae@gtlaw.com

/s/ Dennis A. Meloro

Dennis A. Meloro (DE Bar No. 4435)  
The Nemours Building  
1007 North Orange Street, Suite 1200  
Wilmington, Delaware 19801  
Telephone: (302) 661-7000  
Facsimile: (302) 661-7360  
Email: melorod@gtlaw.com

*Counsel for the Debtors and Debtors in Possession*