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PROPOSED COUNSEL TO THE DEBTORS
AND DEBTORS IN POSSESSION

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

In re:

Northwest Senior Housing Corporation, *et al.*,¹

Debtors.

Chapter 11

Case No. 22-30659 (MVL)

(Joint Administration Requested)

**DEBTORS’ WITNESS AND EXHIBIT LIST FOR
APRIL 18, 2022 HEARINGS ON FIRST DAY MATTERS**

The above-captioned debtors and debtors in possession (the “**Debtors**”), by and through their undersigned counsel, hereby designate the following witnesses and exhibits (the “**Witness and Exhibit List**”) for the hearing scheduled on April 18, 2022, at 1:30 p.m. (CT) (the “**Hearing**”) before the Honorable Michelle V. Larson at the United States Bankruptcy Court for the Northern District of Texas via WebEx.

A. WITNESSES

1. Nick Harshfield, Treasurer;
2. Robert Jordan, Senior Managing Director, Kurzman Carson Consulting;

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are Northwest Senior Housing Corporation (1278) and Senior Quality Lifestyles Corporation (2669). The Debtors’ mailing address is 8523 Thackery Street, Dallas, Texas 75225.



3. Any witness necessary to authenticate a document;
4. Any rebuttal and/or impeachment witnesses; and
5. Any person listed on the witness list of another party.

B. EXHIBITS

The Debtors may offer into evidence any or all of the following at the Hearing:

Debtors' Exhibit No.	Description of Exhibit	Offered	Objection	Admitted
1.	Organizational Chart – Exhibit A to <i>Declaration of Nick Harshfield in Support of Chapter 11 Petition and First Day Pleadings</i> [Docket #7]			
2.	List of Governmental Authorities – Exhibit 1 to <i>Debtors' Motion for Entry of Interim and Final Orders Authorizing Payment of Prepetition Taxes and Fees</i> [Docket #11]			
3.	Utilities Service List – Exhibit 1 to <i>Debtors' Motion for Entry of Interim and Final Orders (I) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service, (II) Deeming the Utility Providers Adequately Assured of Future Performance, and (III) Establishing Procedures for Determining Requests for Additional Adequate Assurance</i> [Docket #15]			
4.	Insurance Schedule – Exhibit 1 to <i>Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder, (B) Renew, Revise, Extend, Supplement, Change, or Enter Into New Insurance Policies, (C) Pay Brokerage and (II) Granting Related Relief</i> [Docket #17]			

Debtors' Exhibit No.	Description of Exhibit	Offered	Objection	Admitted
5.	Premium Financing Agreement – Exhibit C to <i>Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder, (B) Renew, Revise, Extend, Supplement, Change, or Enter Into New Insurance Policies, (C) Pay Brokerage and (II) Granting Related Relief</i> [Docket #17]			
6.	New Residency Agreement Addendum – Exhibit B to <i>Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Continue (A) Escrowing Entrance Fees in the Ordinary Course and (B) Refunding Certain Entrance Fees During the Chapter 11 Cases and (II) Granting Related Relief</i> [Docket #18]			
7.	Escrow Agreement dated September 27, 2021 – Exhibit C to <i>Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Continue (A) Escrowing Entrance Fees in the Ordinary Course and (B) Refunding Certain Entrance Fees During the Chapter 11 Cases and (II) Granting Related Relief</i> [Docket #18]			
8.	Bank Accounts – Exhibit 1 to <i>Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing (A) Continued Use of Debtors' Existing Cash Management System, (B) Maintenance of Debtors' Existing Bank Accounts, and (C) Continued Use of Debtors' Existing Business Forms and (II) Granting Related Relief</i> [Docket #19]			

Debtors' Exhibit No.	Description of Exhibit	Offered	Objection	Admitted
9.	Cash Management Schematic – Exhibit 2 to <i>Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing (A) Continued Use of Debtors' Existing Cash Management System, (B) Maintenance of Debtors' Existing Bank Accounts, and (C) Continued Use of Debtors' Existing Business Forms and (II) Granting Related Relief</i> [Docket #19]			
10.	KCC Agreement for Services – Exhibit B to <i>Debtors' Application for Entry of an Order (A) Authorizing the Retention and Employment of Kurtzman Carson Consultants LLC as Claims, Noticing and Solicitation Agent, Nunc Pro Tunc to the Petition Date and (B) Granting Related Relief</i> [Docket #21]			
11.	Budget – Exhibit 1 to <i>Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II) Authorizing Post-Petition Financing, (III) Granting Adequate Protection, (IV) Modifying the Automatic Stay, (V) Scheduling the Final Hearing and Approving the Form and Method of Notice Thereof, and (VI) Granting Related Relief</i> [Docket #35]			

Debtors' Exhibit No.	Description of Exhibit	Offered	Objection	Admitted
12.	Attorney Checklist Concerning Motions and Orders Pertaining to Cash Collateral and Post-petition Financing – Exhibit B to <i>Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Use of Cash Collateral, (II) Authorizing Post-Petition Financing, (III) Granting Adequate Protection, (IV) Modifying the Automatic Stay, (V) Scheduling the Final Hearing and Approving the Form and Method of Notice Thereof, and (VI) Granting Related Relief</i> [Docket #35]			
13.	Consolidated List of 30 Largest Unsecured Creditors [Docket #3]			

The Debtors reserve the right to use additional exhibits for purposes of rebuttal or impeachment and to further supplement the foregoing lists of witnesses and exhibits as appropriate. The Debtors also reserve the right to rely upon and use as evidence (i) additional documents produced by the Debtors, (ii) exhibits included on the exhibit lists of any other parties in interest, and (iii) any pleading, hearing transcript, or other document filed with the Court in the above-captioned matter.

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Dated: April 16, 2022
Dallas, Texas

POLSINELLI PC

/s/ Trinitee G. Green

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