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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)

(Jointly Administered)

**DEBTORS' WITNESS AND EXHIBIT LIST FOR
HEARINGS ON MAY 26, 2022 AT 9:30 A.M. (CT)**

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 May 26, 2022, at 9:30 a.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. Chad J. Shandler, Senior Managing Director with FTI Consulting, Inc.;

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
A.	Declaration of Nick Harshfield in Support of Chapter 11 Petition and First Day Pleadings [Docket No. 7]			
B.	Debtors' Motion for authority to apply and disburse funds /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 Filed by Debtor Northwest Senior Housing Corporation [Docket 18]			
C.	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 [Docket No. 19]			
D.	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 [Docket No. 35]			

Debtors' Exhibit No.	Description of Exhibit	Offered	Objection	Admitted
E.	Notice of Filing Supplemental Exhibit – Exhibit C to the DIP Motion, which is that certain Priming Superpriority Debtor-In-Possession Credit Agreement by and between Northwest Senior Housing Corporation and Senior Quality Lifestyles Corporation as Debtors, and UMB Bank, N.A., in its capacity as Trustee, as DIP Lender [Docket No. 72]			
F.	Notice of Filing of Final Order (1) Authorizing Debtors in Possession to Obtain Post-Petition Financing; (2) Authorizing Debtors in Possession to Use Cash Collateral; (3) Providing Adequate Protection; and (4) Granting Liens, Security Interests and Superpriority Claims and Budget [Docket No. 243]			
G.	Correspondence - Johnson May 20 Letter to Counsel for Intercity re DIP Budget and DIP Detail			
H.	Motion for Entry of an Order (I) Authorizing the Debtors to Suspend the Payment of Rent Under 11 U.S.C. Section 365(D)(3) and (II) Granting Related Relief [Docket 127]			
I.	Debtors' Response to Intercity Investment Properties, Inc.'s Motion for Adequate Protection Motion [Docket No. 144]			
J.	Debtors' Limited Objection to Intercity Investment Properties, Inc.'s Supplement to Motion for Adequate Protection [Docket No. 167]			
K.	Debtors' Reply to Intercity Investment Properties, Inc.'s Objection to Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Suspend the Payment of Rent Under 11 U.S.C. § 365(d)(3) and (II) Granting Related Relief [Docket No. 182]			

Debtors' Exhibit No.	Description of Exhibit	Offered	Objection	Admitted
L.	Debtors' Omnibus Sur-Reply to (I) Intercity Investment Properties, Inc.'s Sur-Reply and (II) the Official Committee of Unsecured Creditors' Response to the Debtors' Rent Deferral Motion [Docket No. 277]			

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) any additional documents produced by the Debtors, (ii) exhibits included on the exhibit lists of any other parties in interest or any documents that may be produced by such parties in interest, and (iii) any pleading, hearing transcript, or other document filed with the Court in the above-captioned matter.

Dated: May 23, 2022
 Dallas, Texas

POLSINELLI PC

/s/ Trinitee G. Green

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