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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.*,<sup>1</sup>  
  
Debtors.

Chapter 11

Case No. 22-30659 (MVL)

(Jointly Administered)

**NOTICE OF AGENDA OF MATTERS SCHEDULED  
FOR HEARING ON JUNE 3, 2022 AT 10:00 A.M.**

**CONTESTED MATTERS GOING FORWARD**

1. *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 Filed by Debtor Northwest Senior Housing Corporation* [Docket No. 18]

Response Date: May 19, 2022

Status: This matter is going forward.

Related Documents:

- a. Notice of Hearing on First Day Motions [Docket No. 38]
- b. Interim Order (I) Authorizing the Debtors to (A) Escrowing Entrance Fees in the Ordinary Course and (B) Refunding

<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 Northwest Senior Housing Corporation (1278) and Senior Quality Lifestyles Corporation (2669). The Debtors' mailing address is 8523 Thackery Street, Dallas, Texas 75225.



- Certain Entrance Fees During the Chapter 11 Cases and (II) Granting Related Relief [Docket No. 100]
- c. Certificate of Service [Docket No. 122]
- d. Notice of Hearing [Docket No. 172]
- e. Amended Notice of Hearing [Docket No. 173]
- f. Certificate of Service [Docket No. 186]
- g. Second Interim Order (I) Authorizing the Debtors to (A) Escrowing Entrance Fees in the Ordinary Course and (B) Refunding Certain Entrance Fees During the Chapter 11 Cases and (II) Granting Related Relief [Docket No. 219]
- h. Third Interim Order (I) Authorizing the Debtors to (A) Escrowing Entrance Fees in the Ordinary Course and (B) Refunding Certain Entrance Fees During the Chapter 11 Cases and (II) Granting Related Relief [Docket No. 324]
- i. Certificate of Service [Docket No. 354]
- j. Notice of Hearing [Docket No. 341]
- k. Debtors' Omnibus Reply in Support of 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 [Docket No. 352]

Response(s):

- a. Brad B. Blumenthal's Objection to 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 [Docket No. 157]
- b. Brad B. Blumenthal's First Amended Objection to 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 [Docket No. 244]
- c. Official Committee of Unsecured Creditors' Response to Debtors' Escrow Motion [Docket No. 256]

- d. Allan Metz and Gloria M. Simon's Joinder to Brad B. Blumenthal's First Amended Objection to 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 [Docket No. 258]
- e. Bank of America's Joinder and Objection to 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 [Docket No. 262]
- f. Bonnielyn Francis' Joinder to Brad B. Blumenthal's First Amended Objection to 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 [Docket No. 265]

2. *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]

Response Date: May 4, 2022; extended to May 19, 2022 for Creditors' Committee and the U.S. Trustee; extended to May 20, 2022 for Intercity Investments, Inc.

Status: This matter is going forward.

Related Documents:

- a. Notice of Filing Supplemental Exhibit [Docket No. 72]
- b. Interim Order (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. 112]
- c. Notice of Hearing [Docket No. 113]
- d. Amended Notice of Hearing [Docket No. 173]
- e. Certificate of Service [Docket No. 186]

- f. Second Interim Order (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. 228]
- g. Notice of Filing of Final Order (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. 243]
- h. Notice of Filing of Proposed Third Interim Order (I) Authorizing Debtors in Possession to Obtain Post-Petition Financing; (II) Authorizing Debtors in Possession to Use Cash Collateral; (III) Providing Adequate Protection; (IV) and (V) Granting Liens, Security Interests and Superpriority Claims and Third Interim Budget [Docket No. 303]
- i. Third Interim Order (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. 350]
- j. Debtors' Omnibus Reply to Objections to Debtors' Cash Collateral and DIP Financing Motion [Docket No. 353]

Response(s):

- a. Intercity Investment Properties, Inc.'s Limited Objection to Debtors' Motion for DIP Financing and Use of Cash Collateral [Docket No. 59]
- b. Intercity Investment Properties, Inc.'s Brief in Support of Motion for Adequate Protection and Limited Objection to Debtors' Motion for DIP Financing and Use of Cash Collateral [Docket No. 61]
- c. Brad B. Blumenthal's Limited Objection to Debtors' Motion for Entry of [Final] Order (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. 245]
- d. Patient Care Ombudsman's Limited Objection to Debtors' Motion for Entry of [Final] Order (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. 253]
  - e. Objection of the Official Committee of Unsecured Creditors to The Debtors' Post-Petition Financing Motion [Docket No. 257]
  - f. Allan Metz and Gloria B. Simon's Joinder to Brad B. Blumenthal's Limited Objection to Debtors' Motion for Entry of [Final] Order (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. 259]
  - g. Bank of America, N.A.'s Limited Objection to Debtors' Motion for DIP Financing and Use of Cash Collateral [Docket No. 261]
  - h. Brad B. Blumenthal's First Amended, Limited Objection to Debtors' Motion for Entry of [Final] Order (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. 263]
  - i. United States Trustee's Objection to 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. 264]
  - j. Intercity Investment Properties, Inc.'s Second Supplemental Objection to Debtors' Motion for DIP Financing and Use of Cash Collateral [Docket No. 268]

3. *Debtors' Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* [Docket No. 111]

Response Date: May 11, 2022

Status: This matter is carried over from May 25, 2022 and will go forward.

Related Documents:

Certificate of Service [Docket No. 122]

Notice of Hearing [Docket No. 250]

Certificate of Service [Docket No. 276]

Debtors' Reply to Intercity Investment Properties, Inc.'s Limited Objection to Debtors' Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses and Professionals [Docket No. 294]

Response:

Intercity Investment Properties, Inc.'s Limited Objection to Debtors' Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals [Docket No. 206]

Dated: June 2, 2022  
Dallas, Texas

**POLSINELLI PC**

/s/ Trinitee G. Green

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