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Attorneys for Marlyn B. Calloway,  
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R.W. Calloway, Jr.

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

IN RE:	§	
	§	
NORTHWEST SENIOR HOUSING	§	CASE NO. 22-30659 (MLV)
CORPORATION, et al.,	§	(CHAPTER 11)
	§	
DEBTORS.	§	Jointly Administered

**MARLYN B. CALLOWAY, CHRISTOPHER C. CALLOWAY, AND  
R.W. CALLOWAY, JR.’S OBJECTION TO CONFIRMATION OF FIRST AMENDED  
DISCLOSURE STATEMENT FOR THE PLAN OF REORGANIZATION OF THE PLAN  
SPONSORS DATED DECEMBER 6, 2022**

Come now Marlyn B. Calloway, Christopher C. Calloway, and R.W. Calloway, Jr. (collectively, the “Calloways”), creditors and parties-in-interest, and file this, their Objection to Confirmation of the First Amended Disclosure Statement for the Plan and Reorganization of the Plan Sponsors Dated December 6, 2022 (“Disclosure”) and would respectfully show the Court the following:

1. The Calloways object to the approval of the Disclosure because it fails to provide adequate information related to the payment of Former Resident Claims. Specifically, the Disclosure provides for repayment of Former Resident Claims in a complex, dubious manner which would not ensure the payment of any resident claims let alone all of them in the full amount



of the claims. The Calloways object to this Disclosure for failing to provide any evidence of the cash on hand available to Lifespace, its financial condition more broadly, or any guidance on which resident claims would be paid first pursuant to the proposed scheme, particularly given that the Calloways' claim was reportedly one of the first to be funded by the reletting of the Calloway's particular unit. This disclosure does not provide adequate information required under the bankruptcy code.

WHEREFORE, Marlyn B. Calloway, Christopher C. Calloway, and R.W. Calloway, Jr. request that the Court enter an order denying confirmation of the Plan and granting them such other and further relief to which they may be justly entitled.

Respectfully submitted,

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By: /s/ Craig A. Albert  
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R.W. CALLOWAY, JR.**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served upon all parties via electronically by the Court's PACER system on December 12, 2022.

/s/ Craig A. Albert  
Craig A. Albert