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**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)

**NOTICE OF AGENDA OF CONFIRMATION AND SALE
HEARING ON FEBRUARY 21, 2023 – FEBRUARY 23, 2023**

MATTER GOING FORWARD:

1. Notice of Filing Executed Version of Stalking Horse Asset Purchase Agreement [Docket No. 937]

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.



Status: This matter is going forward.

Related Documents:

- a. Stipulation and Agreed Order Regarding Plan and Sale Related Schedule [Docket No. 953]

Response(s):

- a. Notice of Intercity Investment Properties, Inc.'s Statement Regarding Lease Cure Amount [Docket No. 965]
- b. Intercity Investment Properties, Inc.'s Objection to Adequate Assurance Provided by Stalking Horse Bidder [Docket No. 980]
- c. Bay 9 Holdings LLC's Response to Intercity Investment Properties, Inc.'s Objection to Adequate Assurance Provided by Stalking Horse Bidder and in Support of the Sale Transaction [Docket No. 1175]
- d. Debtors' Joinder to Bay 9 Holdings LLC's Response to Intercity Investment Properties, Inc.'s Objection to Adequate Assurance Provided by Stalking Horse Bidder and in Support of the Sale Transaction [Docket No. 1176]
- e. The Initial Plan Sponsors' Limited Response and Joinder to Bay 9 Holdings LLC's Response to Intercity Investment Properties, Inc.'s Objection to Adequate Assurance Provided by Stalking Horse Bidder and in Support of the Sale Transaction [Docket No 1177]
- f. Intercity Investment Properties, Inc.'s Pre-Hearing Brief on Pecuniary Cure Claim [Docket No. 1181]

2. Third Amended Plan of Reorganization of the Plan Sponsors Dated December 19, 2022 [Docket No. 934]

Response Date: Plan Objection Deadline, February 14, 2023 at 4:00 p.m.

Status: This matter is going forward.

Related Documents:

- a. Notice of Filing Amended Proposed Order Granting Debtors' Trustee and DIP Lender's Motion for an Order (I) Establishing Voting Record Date and Other Deadlines; (II)

- Authorizing Kurtzman Carson Consultants LLC to Act as the Singular Voting Agent with Respect to the Competing Plans; (III) Approving Solicitation and Notice Procedures with Respect to Competing Plans; (IV) Approving Manner and Forms of Ballots, Notices and Related Documents; and (V) Granting Related Relief [Docket No. 906]
- b. Third Amended Disclosure Statement for the Plan of Reorganization of the Plan Sponsors Dated December 19, 2022 [Docket No. 934]
 - c. Order Approving Disclosure Statement and Granting Related Relief [Docket No. 936]
 - d. Motion of Trustee and DIP Lender for Entry of an Order (I) Authorizing and Approving the Bidding Procedures; (II) Authorizing and Approving the Stalking Horse Asset Purchase Agreement; (III) Approving Procedures Related to the Assumption of Certain Executory Contracts and Unexpired Leases; (IV) Scheduling Combined Confirmation and Sale Hearing; and (V) Granting Related Relief [Docket No. 755]
 - e. Order (I) Authorizing and Approving the Bidding Procedures; (II) Authorizing Entry Into the Stalking Horse Asset Purchase Agreement; (III) Approving Procedures Related to the Assumption of Certain Executory Contracts and Unexpired Leases; (IV) Scheduling Combined Confirmation and Sale Hearing and (V) Granting Related Relief [Docket No 946]
 - f. Order (I) Establishing Voting Record Date and Other Deadlines; (II) Authorizing Kurtzman Carson Consultants LLC to Act as the Voting Agent with Respect to the Plan; (III) Approving Solicitation and Notice Procedures; (IV) Approving Manner and Forms of Ballots, Notices and Related Documents; and (V) Granting Related Relief [Docket No. 947]
 - g. Notice of Executory Contracts and Unexpired Leases that May be Assumed, Pursuant to Sections 365 and 1123 of the Bankruptcy Code, in Connection with the Plan and the Proposed Cure Amounts with Respect Thereto [Docket No. 955]
 - h. Certificate of Service [Docket No. 974]

- i. Certificate of Service of Andres Estrada re: Solicitation Materials Served on or Before December 27, 2022 [Docket No. 978]
- j. Affidavit of Publication re: 1) Third Amended Plan of Reorganization of the Plan Sponsors Dated December 19, 2022; 2) Third Amended Disclosure Statement for the Plan of Reorganization of the Plan Sponsors Dated December 19, 2022; and 3) Order (I) Establishing Voting Record Date and Other Deadlines; (II) Authorizing Kurtzman Carson Consultants LLC to Act as the Voting Agent with Respect to the Plan; (III) Approving Solicitation and Notice Procedures; (IV) Approving Manner and Forms of Ballots, Notices and Related Documents; and (V) Granting Related Relief in The New York Times National Edition and The Dallas Morning News [Docket No. 1008]
- k. Notice of Filing Plan Supplement [Docket No. 1039]
- l. Notice of Exhibits to Plan Supplement [Docket No. 1150]
- m. Amended Plan and Sale Deadlines [Docket No. 1056]
- n. Certification of Andres A. Estrada with respect to the Tabulation of Votes on the Third Amended Plan of Reorganization of the Plan Sponsors Dated December 19, 2022 [Docket No. 1101]
- o. Notice of (I) Cancellation of Auction, (II) Designation of the Stalking Horse Bidder as the Successful Bidder, and (III) Amendment to Stalking Horse Asset Purchase [Docket No. 1149]
- p. Certificate of Service [Docket No. 1179]
- q. Amended Certification of Andres A. Estrada with Respect to the Tabulation of Votes on the Third Amended Plan of Reorganization of the Plan Sponsors Dated December 19, 2022 [Docket No. 1218]
- r. Declaration of Nick Harshfield, Vice Chair and Treasurer of the Debtors, in Support of Confirmation of The Third Amended Plan of Reorganization of Plan Sponsors Dated December 19, 2022 [Docket No. 1243]
- s. Declaration of David B. Fields of RBC Capital Markets, LLC as Investment Banker in Support of the Sale of

Substantially all of the Debtor's Assets Pursuant to the Third Amended Plan of Reorganization [Docket No. 1234]

- t. Plan Sponsors' Brief in Support of an Order Confirming Chapter 11 Plan [Docket No. •]

Response(s):

- a. Limited Objection of the Official Committee of Unsecured Creditors and its Professionals to Confirmation of the Plan [Docket No. 1024]
- b. Objection of David Stephen Donosky to Third Amended Plan of Reorganization [Docket No. 1200]
- c. Intercity Investment Properties, Inc.'s Objection to: (I) Trustee and DIP Lender's Motion for Entry of an Order Authorizing and Approving the Stalking Horse Asset Purchase Agreement; and (II) Third Amended Plan of Reorganization of the Plan Sponsors Dated December 19, 2022 [Docket No. 1201]
- d. Declaration of Nicholas P. Hannon in Support of Intercity Investment Properties, Inc.'s Objection to: (I) Trustee and DIP Lender's Motion for Entry of an Order Authorizing and Approving the Stalking Horse Asset Purchase Agreement; and (II) Third Amended Plan of Reorganization of the Plan Sponsors Dated December 19, 2022 [Docket No. 1202]
- e. Exhibit H to the Declaration of Nicholas P. Hannon in Support of Intercity Investment Properties, Inc.'s Objection to: (I) Trustee and DIP Lenders Motion for Entry of an Order Authorizing and Approving the Stalking Horse Asset Purchase Agreement; and (II) Third Amended Plan of Reorganization of the Plan Sponsors Dated December 19, 2022 [Docket No. 1217]
- f. Bay 9 Holding LLC's Limited Response to Intercity Investment Properties, Inc.'s Objection to: (I) Trustee and DIP Lender's Motion for Entry of an Order Authorizing and Approving the Stalking Horse Asset Purchase Agreement; and (II) Third Amended Plan of Reorganization of the Plan Sponsors Dated December 19, 2022 and in support of the Sale Transaction and Plan Confirmation [Docket No. 1244]

Dated: February 17, 2023
Dallas, Texas

POLSINELLI PC

/s/ Trinitee G. Green

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