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Patient Care Ombudsman

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

IN RE:	§	CHAPTER 11
NORTHWEST SENIOR HOUSING CORPORATION, et al.,¹	§	CASE NO: 22-30659 (MVL)
Debtors.	§	(Jointly Administered)
	§	
	§	

**PATIENT CARE OMBUDSMAN FOURTH/FINAL
 FEE APPLICATION COVER SHEET**

Applicant/Capacity:	Susan N. Goodman/ Patient Care Ombudsman
Time Period:	April 28, 2022, through June 13, 2023
Bankruptcy Petition Date:	April 14, 2022
Date PCO Appointment:	April 28, 2022
Amount Accrued:	\$70,838.55 (\$66,676.00 fees; \$4,162.55 expenses)
Amount Requested:	\$70,838.55
Amount Previously Paid:	\$59,491.97 (\$55,339.50 fees; \$4,152.47 expenses)
Amount in Trust:	\$0.00
Amount Unpaid and Requested:	9 th Monthly Fee Application (pending)
Expense Detail:	\$2,514.87 Airfare; \$773.88 Hotel; \$106.53 Meals; \$561.65 Car Rental; \$134.00 Parking; \$71.62 Postage
Retainer:	None
Hourly Rates:	\$395.00
Hours This Application:	171.1
Activity Classification:	General Case Administration 125.6 hours; Travel 17.1; and 28.4 Fees
Accomplishments:	five site visits; seven reports; remote monitoring and data review; hearing attendance; pleading/docket monitoring; monthly/interim/final fee applications

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.



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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.*,²**

Debtors.

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§

CHAPTER 11

CASE NO: 22-30659 (MVL)

(Jointly Administered)

**FOURTH/FINAL FEE APPLICATION OF SUSAN N. GOODMAN FOR
COMPENSATION AND REIMBURSEMENT OF EXPENSES AS PATIENT CARE
OMBUDSMAN FOR PERIOD APRIL 28, 2022, THROUGH JUNE 13, 2023**

NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT: EARLE CABELL FEDERAL BUILDING, 1100 COMMERCE STREET, ROOM 1254, DALLAS, TX 75242-1496 BEFORE CLOSE OF BUSINESS JULY 26, 2023, WHICH IS AT LEAST 24 DAYS FROM THE DATE OF SERVICE HEREOF.

ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK, AND A COPY SHALL BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING MAY BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.

IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.

² 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.

TO THE HONORABLE MICHELLE V. LARSON, UNITED STATES BANKRUPTCY
JUDGE:

SUSAN N. GOODMAN, as the Patient Care Ombudsman (the “**PCO**” or “**Applicant**”), in the above-captioned cases (the “**Chapter 11 Cases**”) submits this fourth and final fee application (the “**Application**”) for approval of compensation and reimbursement of expenses from PCO appointment on April 28, 2022 through the plan effective date of June 13, 2023 (the “**Application Period**”), pursuant to Sections 330 and 331 of Title 11 of the United States Code (the “**Bankruptcy Code**”). In support of the Application, PCO represents as follows:

JURISDICTION AND VENUE

1. This Court has jurisdiction of this Chapter 11 proceeding pursuant to 28 U.S.C. §§ 157 and 1334. This matter constitutes a core proceeding pursuant to 28 U.S.C. § 157(b)(2).
2. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.
3. The statutory and other predicates for the relief requested herein are Bankruptcy Code sections 105(a), 330, and 331; Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”); Rule 2016-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas, including Appendix F therein (the “**Local Rules**”); and the court’s June 13, 2022, *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses and Professionals* (the “**Interim Compensation Order**”) [Docket No. 401] entered in these Chapter 11 cases.

BACKGROUND

4. On April 14, 2022 (the “**Petition Date**”), each of the Debtors filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Northern District of Texas, Dallas Division (the “**Court**”). The cases were jointly administered under Case No. 22-30659.
5. The Debtors continued to operate and manage their businesses as debtors in possession pursuant to Bankruptcy Code sections 1107(a) and 1108. No trustee or examiner was appointed.

6. On April 26, 2022, the Court entered its *Order Directing the Appointment of a Patient Care Ombudsman* (the “**PCO Order**”) at Docket No. 128.

7. In response, on April 28, 2022, the United States Trustee’s Office filed its *Notice of Appointment of Patient Care Ombudsman Under 11 U.S.C. § 333* (the “**Appointment Notice**”), indicating the appointment of the Applicant to serve as the PCO [Docket No. 137].

SUMMARY OF SERVICES PROVIDED

8. After the Appointment Notice, Debtors’ counsel facilitated PCO’s introduction to Debtor operational leadership at the Plaza at Edgemere, the focus of PCO’s appointment.

9. Across the Application Period, PCO engaged in five site visits and authored seven interim reports.³ PCO also appeared, as necessary, during hearings to both track potential case timing relative to hearing outcomes, and express resident concerns to the court when appropriate.

10. In addition to conducting site visits, authoring reports, and attending hearings, PCO remained regularly engaged with operational leadership (including the assisted living resident counsel president) and regularly monitored quality data during the Application Period. PCO also monitored the case docket and reviewed pleadings at a level of engagement consistent with the PCO case role.

11. PCO spent a total of 171.1 hours engaged in the PCO role during the Application Period. More than 73% of PCO’s professional time, 125.6 hours, were classified under general case administration. Half rate non-working travel hours totaled 17.1 hours (noting that PCO only charged for direct transit hours). Time spent associated with fee activities totaled 28.4 hours. Of PCO’s total time expenditure, 2.3 hours of the referenced time were not billed—2.1 hours in general case administration and 0.2 hours in fee administration time.

12. The total sum due to PCO for professional services rendered on behalf of Debtor patients/residents is \$66,676.00 in fees and \$4,162.55 in actual, necessary expenses.

13. Expenses, by category were:

³ The docket locations for PCO’s seven interim reports, in order of filing were: First Report at Docket No. 364; Second Report at Docket No. 504; Third Report at Docket No. 681; Fourth Report at Docket No. 867; Fifth Report at Docket No. 1162; Sixth Report at Docket No. 1388; and Seventh Report at Docket No. 1587.

Expense Category	Total
Airfare	\$2,514.87
Car Rental	\$561.65
Hotel	\$773.88
Meals	\$106.53
Parking Fees/Tolls	\$134.00
Postage	\$71.62
Total	\$4,162.55

14. In support of this Application, PCO submits a fee summary and detailed invoices attached herein as **Exhibits B and C**. A proposed fee order is also attached herein as **Exhibit D**.

EVALUATION STANDARDS

15. United States Bankruptcy Code § 330(a)(3)-(4)(A) provides an analytical framework to evaluate the reasonableness of professional fees and expenses. The court considers the nature, extent, and value of the services rendered relative to: (1) the time spent, (2) the rates charged, (3) whether the services were necessary or provided a benefit to the estate, (4) the time spent relative to the complexity and nature of the task addressed, (5) whether the professional demonstrated skill and expertise, (6) whether the professional fee is comparatively reasonable, and (7) whether the fee avoids unnecessary duplication and/or waste. If the professional fee requested fails this analysis, the court may reduce the amount of compensation awarded.

16. The Fifth Circuit has historically adopted a “lodestar” method for determining the reasonableness of compensation under Bankruptcy Code §330. See *In re Lawler*, 807 F.2d 1207, 1211 (5th Cir. 1987) (the primary method used to determine a reasonable fee in bankruptcy is “equal to the number of hours reasonably expended multiplied by the prevailing hourly rate in the community for similar work”).

17. This Application seeks payment for 168.8 hours of the total 171.1 hours of PCO time. More than 73% percent of PCO's billed time was for activities that classify as general case administration under Section I (C) of the *Guidelines for Compensation and Reimbursement of Professionals in Chapter 11 Cases* for the United States Bankruptcy Court Northern District of Texas, Effective January 1, 2001. Billed ½ rate non-working travel time, across five separate site visits, totaled 17.1 hours, with only direct, in-transit travel hours between PCO's office and the Edgemere location billed, thereby reducing PCO's total accumulated travel time. A total of 28.4 hours of time were spent in activities associated with fee document preparation. PCO did not bill for the 0.2 hours of time spent clarifying a typo in one of her monthly fee applications with the Debtors' financial advisor team member.

18. Across PCO's 411-day appointment, the average monthly costs of her role, inclusive of fees and expenses, totaled \$5,170.70. PCO asserts that she brought value to the Debtor residents at minimal costs to the estate, particularly as compared to other professional fees in this case.

19. PCO's engagement provided vital and necessary service to residents and patients cared for by Debtor during the Application Period. PCO reduced costs to the Debtors by visiting the location contemporaneous with other travel into the area, reducing the burden of the cost of the PCO role on the Debtors organizations.

20. The \$395.00 hourly rate charged by PCO compares favorably to hourly rates charged by other professionals in this field and is consistent with PCO's health law practice fees. PCO has a clinical, health care operations, and health law compliance background that allowed for thorough PCO coverage without engagement of other professionals.

21. PCO has not shared or agreed to share compensation or reimbursement awarded in this case with any other person or entity. No agreement or understanding exists between Applicant and any other person for a division of compensation. Applicant has not entered into any agreement prohibited by U.S.C. Title 18 §155.

RELIEF REQUESTED

WHEREFORE, PCO requests this court enter an order substantially in the form attached herein as Exhibit D:

- a. approving fees, on a final basis, for the allowance of \$66,676.00 as reasonable compensation for actual and necessary professional services rendered by the PCO for the benefit of Debtor residents/patients during the Application Period;
- b. approving expenses, on a final basis, for the reimbursement of actual and necessary out-of-pocket expenses in the amount of \$4,162.55 incurred by the PCO in the performance of required professional services during the Application Period;
- c. authorizing the Debtors to pay the PCO for approved fees and expenses in the aggregate amount of **\$70,838.55** (the “**Award**”);
- d. directing the Debtors to pay Applicant any yet unpaid fees and expenses through PIVOT HEALTH LAW, LLC; and,
- e. granting such other and further relief as the court deems just and proper.

DATED: July 4, 2023.

By: /s/Susan N. Goodman, RN JD (TX Bar 24117585)

PIVOT HEALTH LAW, LLC

P.O. Box 69734

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Patient Care Ombudsman

STATEMENT OF CERTIFYING PROFESSIONAL

The undersigned hereby certifies that she prepared and read the foregoing *Fourth/Final Fee Application of Susan N. Goodman for Compensation and Reimbursement of Expenses as Patient Care Ombudsman for Period April 28, 2022, through June 13, 2023*, and to the best of her knowledge, information and belief, formed after reasonable inquiry, the compensation and expense reimbursement requested (a) are in conformity with the Court's *Guidelines for Compensation and Reimbursement of Professionals in Chapter 11 Cases*, effective January 1, 2001, (b) are permissible under the relevant rules, court orders, and Bankruptcy Code provisions, (c) were billed at rates in accordance with practices, no less favorable than those customarily employed by the Applicant, and generally accepted by the Applicant's clients, and, (d) are *without* any agreement or understanding between Applicant and any other person for a division of compensation or any agreement prohibited by U.S.C. Title 18 § 155.

DATED: July 4, 2023.

By: /s/Susan N. Goodman, RN JD (TX Bar 24117585)
Susan N. Goodman
Patient Care Ombudsman

EXHIBIT A Certificate of Service

I hereby certify that a true and correct copy of the foregoing pleading was served upon the parties via the Court's electronic transmission facilities, on this 4th day of July 2023. Those Parties Appearing in the case were sent an electronic copy of this Application with the accompanying *Notice of Filing and Deadline to File Objections on Fourth & Final Fee Application of Susan N. Goodman for Compensation and Reimbursement of Expenses as Patient Care Ombudsman for Period April 28, 2022, through June 13, 2023* (the "**Notice**"), filed contemporaneously with this pleading. Those remaining parties listed on the *July 23, 2023 Limited Service List* [Docket No. 1627] were emailed a copy of both pleadings (if provided) or were mailed a copy of the Notice by USPS First Class Mail.

/s/Susan N. Goodman, RN JD (TX Bar 24117585)

Parties Appearing in Case

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Remaining Limited-Service List Parties - EML

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Remaining Limited-Service List Parties – USPS First Class Mail

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<p>Northwest Sr. Housing Corp. Attn: Nick Harshfield 8523 Thackery Street Dallas TX 75225</p>	<p>Texas State Attorney General Attn: Ken Paxton PO Box 13528, 8th Fl, WPC Bldg Austin, TX 78711</p>	<p>US Attorney’s Office ND Texas Attn: Bankruptcy Division 1100 Commerce St, 3rd Fl Dallas, TX 75242-1699</p>
<p>United States Dept of Justice Attorney General 950 Pennsylvania Ave NW Washington DC 20530-0001</p>		

/s/ Susan N. Goodman, RNJD (TX Bar 24117585)



EXHIBIT B
Fee Statement Summary

Case Name: Northwest Sr Housing Corp, d/b/a Edgemere
Case No: ND TX DAL 22-30659
03/01/23 to 06/13/23

Cumulative Totals to Date					
FEES BILLED	COSTS BILLED	HOLDBACK	FEES PAID	COSTS PAID	
\$66,676.00	\$4,162.55	\$13,335.20	\$55,339.50	\$4,152.47	
Date:	5-Jul-23	Objection Deadline:	29-Jul-23		

MO/YR	PROFESSIONAL	RATE/HR	HOURS BILLED	TOTAL	HOLDBACK	AMT DUE
Mar-23	SUSAN N. GOODMAN	\$395.00	25.5	\$10,072.50	\$2,014.50	\$8,058.00
Apr-23	SUSAN N. GOODMAN	\$395.00	7.0	\$2,765.00	\$553.00	\$2,212.00
May-23	SUSAN N. GOODMAN	\$395.00	9.0	\$3,555.00	\$711.00	\$2,844.00
Jun-23	SUSAN N. GOODMAN	\$395.00	7.6	\$3,002.00	\$600.40	\$2,401.60
	TOTAL FEES			\$19,394.50	\$3,878.90	\$15,515.60
	TOTAL COSTS			\$535.84	\$0.00	\$535.84
	AMOUNT DUE			\$19,930.34		\$16,051.44



EXHIBIT B
Fee Statement Summary

Case Name: Northwest Sr Housing Corp, d/b/a Edgemere
Case No: ND TX DAL 22-30659
11/01/22 to 02/28/23

Cumulative Totals to Date					
FEES BILLED	COSTS BILLED	HOLDBACK	FEES PAID	COSTS PAID	
\$47,281.50	\$3,626.71	\$9,456.30	\$33,622.40	\$2,521.77	

Date:	5-Jul-23	Objection Deadline:	29-Jul-23
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MO/YR	PROFESSIONAL	RATE/HR	HOURS BILLED	TOTAL	HOLDBACK	AMT DUE
Nov-22	SUSAN N. GOODMAN	\$395.00	8.4	\$3,318.00	\$663.60	\$2,654.40
Dec-22	SUSAN N. GOODMAN	\$395.00	17.9	\$7,070.50	\$1,414.10	\$5,656.40
Jan-23	SUSAN N. GOODMAN	\$395.00	6.1	\$2,409.50	\$481.90	\$1,927.60
Feb-23	SUSAN N. GOODMAN	\$395.00	8.9	\$3,515.50	\$703.10	\$2,812.40
	TOTAL FEES			\$16,313.50	\$3,262.70	\$13,050.80
	TOTAL COSTS			\$1,457.72	\$0.00	\$1,457.72
	TOTAL			\$17,771.22		\$14,508.52



EXHIBIT B
Fee Statement Summary

Case Name: Northwest Sr Housing Corp, d/b/a Edgemere
Case No: ND TX DAL 22-30659
7/01/22 to 10/31/22

Cumulative Totals to Date					
FEES BILLED	COSTS BILLED	HOLDBACK	FEES PAID	COSTS PAID	
\$30,968.00	\$2,168.99	\$6,193.60	\$20,942.90	\$1,201.26	

Date:	5-Jul-23	Objection Deadline:	29-Jul-23
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MO/YR	PROFESSIONAL	RATE/HR	HOURS BILLED	TOTAL	HOLDBACK	AMT DUE
Jul-22	SUSAN N. GOODMAN	\$395.00	7.4	\$2,923.00	\$584.60	\$2,338.40
Aug-22	SUSAN N. GOODMAN	\$395.00	6.5	\$2,567.50	\$513.50	\$2,054.00
Sep-22	SUSAN N. GOODMAN	\$395.00	13.9	\$5,490.50	\$1,098.10	\$4,392.40
Oct-22	SUSAN N. GOODMAN	\$395.00	8.7	\$3,436.50	\$687.30	\$2,749.20
	TOTAL FEES			\$14,417.50	\$2,883.50	\$11,534.00
	TOTAL COSTS			\$982.09	\$0.00	\$982.09
	AMOUNT DUE			\$15,399.59		\$12,516.09



EXHIBIT B
Fee Statement Summary

Case Name: Northwest Sr Housing Corp, d/b/a Edgemere
Case No: ND TX DAL 22-30659
4/28/22 to 6/30/22

Cumulative Totals to Date					
FEES BILLED	COSTS BILLED	HOLDBACK	FEES PAID	COSTS PAID	
\$16,550.50	\$1,186.90	\$3,310.10	\$0.00	\$0.00	

Date:	5-Jul-23	Objection Deadline:	29-Jul-23
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MO/YR	PROFESSIONAL	RATE/HR	HOURS BILLED	TOTAL	HOLDBACK	AMT DUE
May-22	SUSAN N. GOODMAN	\$395.00	33.1	\$13,074.50	\$2,614.90	\$10,459.60
Jun-22	SUSAN N. GOODMAN	\$395.00	8.8	\$3,476.00	\$695.20	\$2,780.80
	TOTAL FEES			\$16,550.50	\$3,310.10	\$13,240.40
	TOTAL COSTS			\$1,186.90	\$0.00	\$1,186.90
	AMOUNT DUE			\$17,737.40	\$3,310.10	\$14,427.30



Pivot Health Law, LLC

P.O. Box 69734
 Oro Valley, AZ 85737

Invoice

Invoice #: 1212
Invoice Date: 6/7/2022

Period: 4/28/2022 - 5/31/2022

Bill To:

Northwest Sr Housing Corp.
 d/b/a The Plaza at Edgemere
 ND TX DAL 22-30659
 File No. 43415

Date	Description	Hours/Qty	Rate	Amount
4/28/2022	Draft, finalize and file NOA as PCO	0.1	395.00	39.50
4/29/2022	EML exchg with AL resident council president and initial call (1.0)	1	395.00	395.00
4/30/2022	docket monitoring and review at level consistent with role, DE 145 NOA and document updates	0.1	395.00	39.50
5/2/2022	EML exchgs re scope of AL Resident council with follow-up email with information requested (.2)	0.2	395.00	79.00
5/3/2022	Docket monitoring, review, analysis at a level consistent with PCO role - DEs 152, 150 (and document update) (.1); call with Debtor counsel, including follow-up emails with site leadership re introduction (.7); Initial call with Ex Dir and follow-up (.4)	1.2	395.00	474.00
5/4/2022	follow up call with executive director (.4); docket monitoring and review re various objections re cash collateral usage (.1); research prior PCO fee amounts with EML to Debtor counsel cc UST re concerns associated with PCO carve out (.3)	0.8	395.00	316.00
5/5/2022	docket monitoring and high level review for case dynamics [DEs 169 - 173 with update to NOA and hearing calendaring]	0.1	395.00	39.50
5/10/2022	Call with executive director(.9); Docket monitor, analysis and follow-up DEs 188-189 (.1)	1	395.00	395.00
5/10/2022	Calls with Debtor counsel re 2d interim cash collateral order (.1); Update call with UST re same (.3); docket DE 195 and 196 and follow-up re notice documents (.1)	0.5	395.00	197.50
5/11/2022	Review revisions to hearing proposed orders (.1); Attend hearing part 1 (1.2); Attend hearing part 2 [up to adversary part] (1.1);	2.4	395.00	948.00

Total

Payments/Credits

Balance Due



Pivot Health Law, LLC

P.O. Box 69734
 Oro Valley, AZ 85737

Invoice

Invoice #: 1212
Invoice Date: 6/7/2022

Period: 4/28/2022 - 5/31/2022

Bill To:

Northwest Sr Housing Corp.
 d/b/a The Plaza at Edgemere
 ND TX DAL 22-30659
 File No. 43415

Date	Description	Hours/Qty	Rate	Amount
5/12/2022	Call with FA re cash collateral budget to carve out (.2); docket monitoring and document updates r/t DE 225 included	0.2	395.00	79.00
5/15/2022	Prepare 2015.1 posting in lieu personal service - to Ex Dir for review (.1); review EML agenda for AL resident council (.1)	0.2	395.00	79.00
5/16/2022	1/2 rate non-working travel TUS-PHX (2.0); PHX - DAL (2.5); DAL - Hotel (.5) = 5/2=2.5	2.5	395.00	987.50
5/17/2022	Initial leadership introduction (.7); am meeting (.5); Maint, EVS, Kitchen, Laundry, new DON (3.0); resident council (1.6); AL staff, SNF unit including resident discussions and memory unit interaction manager and residents (2.9)	8.7	395.00	3,436.50
5/17/2022	1/2 rate NW travel: to airport (.5); DAL to PHX 2.5; PHX to TUS 2.0 = 5/2 = 2.5	2.5	395.00	987.50
5/18/2022	docket monitoring and pleading review [DEs 235, 236, 238 - 250] at level consistent with role in case	0.5	395.00	197.50
5/19/2022	Review basis for objections in DE 243, 244, 245 (.3); Draft PCO limited obj and reservation rights (1.1)	1.4	395.00	553.00
5/19/2022	Update call with new UST (AUST) assigned to case (.5); review 5 emails with news articles 2/27/22 through 4/29/22 (.6); review DE 264 UST obj (.1); Docket monitoring, review, and notice updates for DE 252, 255, 256, 257, 260, and 263 (.2)	1.4	395.00	553.00
5/20/2022	Docket monitoring, review relative to role DE 266 and EML follow up Debtor counsel re limited obj	0.1	395.00	39.50

Total

Payments/Credits

Balance Due



Pivot Health Law, LLC

P.O. Box 69734
 Oro Valley, AZ 85737

Invoice

Invoice #: 1212
Invoice Date: 6/7/2022

Period: 4/28/2022 - 5/31/2022

Bill To:

Northwest Sr Housing Corp.
 d/b/a The Plaza at Edgemere
 ND TX DAL 22-30659
 File No. 43415

Date	Description	Hours/Qty	Rate	Amount
5/23/2022	docket monitoring and pleading review at a level consistent with role [DEs 260 - 272] (.2); update call with Ex Dir and finalize posting placement (.5); draft and file 1st 2015.1 pleading (.2)	0.7	395.00	276.50
5/23/2022	Docket monitoring and pleading review at level consistent with role DE 277 - 287 (.4); call with Debtor counsel and update EMLs AUST (.4)	0.8	395.00	316.00
5/24/2022	EML follow up Bobbi/Cyndi (.1); Rex Smith (.1)	0.2	395.00	79.00
5/24/2022	Docket monitoring and pleading review at level consistent with role DE 290 - 296, calendar and NOA updates (.3)	0.3	395.00	118.50
5/25/2022	Attend hearing (100 min) (discounted)	1.1	395.00	434.50
5/26/2022	Site visit f/u call with Plaza administrator (.8); introductory call with IL Asst Ex Dir (.2);	1	395.00	395.00
5/31/2022	intro call Dir HR (.2); Continue drafting PCO First Interim Report to final draft (3.7); EML follow-ups with admin and maint re QAPI data, 2015.1 posting location and picture, and LSC, also included is docket monitoring and review DEs 336-339 (.2)	4.1	395.00	1,619.50
	Professional Fee Subtotal			13,074.50
5/4/2022	NWSH SV1 AIRFARE (ONE WAY)		428.98	428.98
5/4/2022	NWSH SV1 AIRFARE (ONE WAY)		400.98	400.98
5/16/2022	NWSH SV1 MEALS (Chick fil A)		8.87	8.87
5/16/2022	NWSH SV1 MEALS (Peet's Coffee)		4.07	4.07
5/17/2022	NWSH HOTEL SV 1 (Campbell Ctr Doubletree)		162.52	162.52
5/17/2022	NWSH SV1 CAR RENTAL (National)		90.84	90.84
5/17/2022	NWSH SV 1 PARKING FEES/TOLLS (Sky Harbor East Economy)		28.00	28.00
	Total Reimbursable Expenses			1,124.26

Total \$14,198.76

Payments/Credits \$0.00

Balance Due \$14,198.76



Pivot Health Law, LLC

P.O. Box 69734
Oro Valley, AZ 85737

Invoice

Invoice #: 1216
Invoice Date: 7/12/2022

Period: June 1 - 30, 2022

Bill To:

Northwest Sr Housing Corp.
d/b/a The Plaza at Edgemere
ND TX DAL 22-30659
File No. 43415

Date	Description	Hours/Qty	Rate	Amount
6/1/2022	EML draft report to leadership and follow up EMLs with Admin re QAPI data	0.1	395.00	39.50
6/1/2022	Docket monitoring and pleading review at level consistent with role [DEs 346, 348, 350, 352, 353, 355] various pleadings in advance of June 3 (.3); QAPI and LSC update document review (.4)	0.7	395.00	276.50
6/2/2022	call with debtor counsel re June 3 hearing and PCO report (.2); Docket monitoring and pleading review at level consistent with role to understand potential resident case implications [DEs 360 - 363] (.3); Final report edits, file, serve (.6)	1.1	395.00	434.50
6/6/2022	schedule check in with Ex Dir and review of docket and hearing requests [DE 377-78] (.2)	0.2	395.00	79.00
6/7/2022	Update call with Ex Dir	0.4	395.00	158.00
6/7/2022	Prepare May Exhib B	0.2	395.00	79.00
6/8/2022	Review and analyze updated April QAPI and initial load of March QAPI data (.7); EML follow up to Admin and DON re questions from review (.2); EML update from Ex Dir re use of report in MarkComm efforts (.1NC)	0.9	395.00	355.50
6/9/2022	Docket monitoring and pleading review/analysis at level consistent with role - DEs 386 - 393 (.3)	0.3	395.00	118.50
6/10/2022	Listen to hearing audio file re hearing and reasoning for rulings on outstanding motions (1.0); NOA and requisite notice updates DE 396 (.1)	1.1	395.00	434.50
6/14/2022	EML exchanges with professionals re proposed final DIP order wording - review and comment relative to role (.2); docket monitoring and pleading review - DE 401 interim comp order (.1)	0.3	395.00	118.50

Total

Payments/Credits

Balance Due



Pivot Health Law, LLC

P.O. Box 69734
 Oro Valley, AZ 85737

Invoice

Invoice #: 1216
Invoice Date: 7/12/2022

Period: June 1 - 30, 2022

Bill To:

Northwest Sr Housing Corp.
 d/b/a The Plaza at Edgemere
 ND TX DAL 22-30659
 File No. 43415

Date	Description	Hours/Qty	Rate	Amount
6/15/2022	Review of various emails and pleading drafts relative to final DIP order documents	0.3	395.00	118.50
6/15/2022	EMLs x4 with news updates since 6/10/22 ruling on the record (.2); DE 406 NOA and updates to notice documents (.1)	0.3	395.00	118.50
6/16/2022	Stop-in, unscheduled site visit contemporaneous with other travel to area (Plaza leadership; kitchen; skilled walk through; laundry; Ex Dir; HR; and Care Mgr)	2.3	395.00	908.50
6/22/2022	EML from Debtor counsel with final DIP documents for review and comment (reviewed relative to role for patient/resident implications)	0.1	395.00	39.50
6/23/2022	docket monitoring and pleading review at level consistent with role DEs 419 - 421 - review final DIP	0.1	395.00	39.50
6/27/2022	Update call with admin	0.2	395.00	79.00
6/28/2022	Docket monitoring and pleading review at level consistent with role - final orders and NOA and document updates re Estes estate	0.1	395.00	39.50
6/29/2022	Review DE 428 re initial fee app FTI	0.1	395.00	39.50
	Professional Fee Subtotal			3,476.00
6/16/2022	NWSH SV2 MEALS (Starbucks PHX)		11.40	11.40
6/17/2022	NWSH CAR RENTAL SV2		51.24	51.24
	Total Reimbursable Expenses			62.64

Total	\$3,538.64
Payments/Credits	\$0.00
Balance Due	\$3,538.64



Pivot Health Law, LLC

P.O. Box 69734
Oro Valley, AZ 85737

Invoice

Invoice #: 1221
Invoice Date: 8/8/2022

Period: July 1 - 31, 2022

Bill To:

Northwest Sr Housing Corp.
d/b/a The Plaza at Edgemere
ND TX DAL 22-30659
File No. 43415

Date	Description	Hours/Qty	Rate	Amount
7/5/2022	TXT exchanges DON re check in call	0.1	395.00	39.50
7/7/2022	Docket monitoring and pleading review at level consistent with role - DE 436	0.1	395.00	39.50
7/14/2022	TXT exchanges with Ex Dir re state survey progress	0.1	395.00	39.50
7/16/2022	Prepare June Exhib B	0.2	395.00	79.00
7/17/2022	Prepare 1st Monthly fee app - adjusted (3 hr paralegal rate and .8 atty rate)	2.3	395.00	908.50
7/17/2022	Prepare, file, and F/U re 2d 2015.1	0.1	395.00	39.50
7/20/2022	Final edits to First Monthly fee app	0.2	395.00	79.00
7/22/2022	Zoom update call with admin in advance second report	0.7	395.00	276.50
7/25/2022	TXT update exchanges with Ex Dir	0.1	395.00	39.50
7/27/2022	Docket monitoring and pleading review at level consistent with role - NOAs DE 481 and 489	0.1	395.00	39.50
7/29/2022	Update call with Executive Director (.4); review CMP info for IP tags (.2); Prepare First Interim Fee App, exhibits, and notice filing/time object (2.6) - note: ECF down, unable to file (adjusted total time down)	3.2	395.00	1,264.00
7/31/2022	Begin drafting 2d interim report	0.2	395.00	79.00
	Professional Fee Subtotal			2,923.00
7/20/2022	NWSH First Mo Fee App		6.80	6.80
7/30/2022	NWSH First Interim Fee App		7.56	7.56
	Total Reimbursable Expenses			14.36

Total	\$2,937.36
Payments/Credits	\$0.00
Balance Due	\$2,937.36



Pivot Health Law, LLC

P.O. Box 69734
Oro Valley, AZ 85737

Invoice

Invoice #: 1227
Invoice Date: 9/16/2022

Period: August 1 - 31, 2022

Bill To:

Northwest Sr Housing Corp.
d/b/a The Plaza at Edgemere
ND TX DAL 22-30659
File No. 43415

Date	Description	Hours/Qty	Rate	Amount
8/1/2022	Finish initial draft second interim report (1.5); docket monitoring and pleading review at level consistent with role [DEs 499-500] (.1); review and analysis of 2567 health and LSC survey findings (.4); call with facilities re LSC findings and resolution (.1)	2.1	395.00	829.50
8/2/2022	Docket monitoring and pleading review at level consistent with role - update NOA documents and report prior to filing (.2)	0.2	395.00	79.00
8/5/2022	docket monitoring and pleading review at level consistent with role - NOA updates to documents [DE 515]	0.1	395.00	39.50
8/8/2022	Prepare Exhib B Jul (.1); Prepare CNO for First Mo PCO Fee App (.1)	0.2	395.00	79.00
8/9/2022	docket monitoring and pleading review at level consistent with role relative to case timing, issues, and patient implications - DE 530 and calendar DS hearing	0.1	395.00	39.50
8/11/2022	File first monthly fee app CNO and review DE 534 motion extnd exclusivity	0.1	395.00	39.50
8/12/2022	Docket monitoring and pleading review at level consistent with role to keep up on case dynamics relative to patient care implications [DEs 541 and 542] LL argument to support motion to dismiss	0.1	395.00	39.50
8/15/2022	Docket monitoring and pleading review at level consistent with role [DE 543] LL pleading as to why to delay dismissal motion deadlines	0.1	395.00	39.50
8/15/2022	Docket monitoring and pleading review at level consistent with role to understanding case pacing and potential operational impacts - DE 546 Amended DIP	0.2	395.00	79.00
8/16/2022	NWSH EML exchanges re check in calls and need for updated QAPI data	0.2	395.00	79.00

Total

Payments/Credits

Balance Due



Pivot Health Law, LLC

P.O. Box 69734
 Oro Valley, AZ 85737

Invoice

Invoice #: 1227
Invoice Date: 9/16/2022

Period: August 1 - 31, 2022

Bill To:

Northwest Sr Housing Corp.
 d/b/a The Plaza at Edgemere
 ND TX DAL 22-30659
 File No. 43415

Date	Description	Hours/Qty	Rate	Amount
8/16/2022	EML exchanges with AL leadership team re upate scheduling and follow-up	0.1	395.00	39.50
8/17/2022	EML exchanges with AL leadership re updates (.1);	0.1	395.00	39.50
8/19/2022	Check in call with AL leadership (.3); EML with admin and update call with interim DON (.3);	1	395.00	395.00
8/19/2022	Review and analyze Jun (.2) and Jul (.2) QAPI; Update call with Ex Dir (.3); review various pleadings for relevance to role (various witness/exhib lists) (.1)	0.4	395.00	158.00
8/23/2022	Follow up with court re first monthly fee app fee order - draft and upload per request	0.2	0.00	0.00
8/23/2022	docket monitoring and pleading review at level consistent with PCO role [DE 562-564] - with high level review of debt obj to LL mot dismiss (.2); prepare CNO 1st int fee, finalize, file, upload (.3)(adjust time down to equal PL rate)	0.5	395.00	197.50
8/25/2022	Docket monitoring and pleading, text order review at level consistent with role to keep up on case dynamics and upcoming hearings [DE 569 - 577 text orders x7] (.3); review pleadings [DE 576, 580-82] (.1); change to uploaded error 1nt fee to amend (.2); Ex Dir update call residence council and DON (.2)	0.8	395.00	316.00
8/26/2022	docket management and document updates relative to NOA at DE 584	0.1	395.00	39.50
8/29/2022	Docket monitoring and pleading review to track case dynamics and hearing scheduling [DE 594]	0.1	395.00	39.50

Total	\$2,567.50
Payments/Credits	\$0.00
Balance Due	\$2,567.50



Pivot Health Law, LLC

P.O. Box 69734
 Oro Valley, AZ 85737

Invoice

Invoice #: 1240
Invoice Date: 10/4/2022

Period: September 1 - 30, 2022

Bill To:

Northwest Sr Housing Corp.
 d/b/a The Plaza at Edgemere
 ND TX DAL 22-30659
 File No. 43415

Date	Description	Hours/Qty	Rate	Amount
9/1/2022	Docket monitoring and pleading review for case dynamics (Debtor and LL re DS and exclusive obj)	0.1	395.00	39.50
9/6/2022	follow up call with executive director re resident's counsel and DON (.4); docket monitoring and pleading review relevant to case role DEs 607-08 (.1)	0.5	395.00	197.50
9/7/2022	follow up debtor FA re confusion surrounding monthly and interim fee apps/orders	0.1	395.00	39.50
9/9/2022	Review pleading DE 615 (reply LL Motion) - high level relative to case dynamics	0.1	395.00	39.50
9/13/2022	Update EML exchnng UST re hearings (.2); docket monitoring and review at level consistent with case role - Debtor and Bank Obj [DE 622, 624] and hearing orders (.2)	0.4	395.00	158.00
9/14/2022	Docket monitoring and pleading review at level consistent with role to monitor case progress, dynamics and potential resident impacts - DE 627 UCC Obj	0.1	395.00	39.50
9/18/2022	Prepare Aug Exhib B	0.2	395.00	79.00
9/18/2022	Begin Draft 2nd monthly fee application (main document)	0.5	395.00	197.50
9/19/2022	Finish Second Monthly Fee App (.3); prepare additional ancillary fee documents (notice and CNO) (.3); update call Ex Dir Edgemere (.2)	0.8	395.00	316.00
9/20/2022	1/2 rate non-working travel for direct movement times TUS-PHX (auto) 2/1=(1.0); PHX to DAL to Debtor (2.8/2= (1.4)	2.4	395.00	948.00
9/20/2022	Third site visit - Ex Dir; Chef/Dining Asst Mgr; Plaza Kitchen; EVS; Facilities; Plaza Admin; Plaza Interim DON; resident counsel board members; activities engagement; visiting nurses vendor discussion;	4.1	395.00	1,619.50

Total

Payments/Credits

Balance Due



Pivot Health Law, LLC

P.O. Box 69734
 Oro Valley, AZ 85737

Invoice

Invoice #: 1240
Invoice Date: 10/4/2022

Period: September 1 - 30, 2022

Bill To:

Northwest Sr Housing Corp.
 d/b/a The Plaza at Edgemere
 ND TX DAL 22-30659
 File No. 43415

Date	Description	Hours/Qty	Rate	Amount
9/21/2022	Site visit follow up call with Ex Dir	0.3	395.00	118.50
9/22/2022	docket monitoring and pleading review at level consistent with role - DEs 630 [LL reply to support Motion to Dismiss] and 631 (.1)	0.1	395.00	39.50
9/25/2022	Update call with resident counsel president	0.5	395.00	197.50
9/26/2022	Docket monitoring and pleading review at level consistent with role to understand case dynamics relative to patient monitoring role [DEs 634 - 639 - plan and exclusivity extrn obj; UCC leave for own plan; DE 642 and hrg req] (.3)	0.3	395.00	118.50
9/28/2022	Docket monitoring and pleading review at level of tracking case dynamics and possible staff/resident impacts - DE 657 Declaration re financial stability and amended hearing witness list	0.1	395.00	39.50
9/29/2022	Dial in to am hearing session re dismissal, extension exclusivity, and other case dynamics relative to potential resident impacts (1.3) then break then (.9)	2.2	395.00	869.00
9/30/2022	Docket monitoring and order review for results of 2nd half hearings (.1); Review POC for 8/22 FICS findings (.3); Begin drafting 3d report (.7)	1.1	395.00	434.50
	Professional Fees Subtotal			5,490.50
9/8/2022	NWSH SV3 AIRFARE		292.98	292.98
9/19/2022	NWSH SV3 HOTEL (prepay for night 9/20/22)		185.15	185.15
9/20/2022	NWSH SV3 MEALS		6.80	6.80
9/20/2022	NWSH SV3 MEALS (Starbucks)		11.78	11.78
9/21/2022	NWSH SV3 CAR RENTAL (SPLIT)		97.44	97.44
9/23/2022	NWSH SV3 PARKING FEES/TOLLS		28.00	28.00
9/26/2022	NWSH POSTAGE 2D MO FEE APP		4.80	4.80
	Total Reimbursable Expenses			626.95

Total	\$6,117.45
Payments/Credits	\$0.00
Balance Due	\$6,117.45



Pivot Health Law, LLC

P.O. Box 69734
 Oro Valley, AZ 85737

Invoice

Invoice #: 1245
Invoice Date: 11/5/2022

Period: October 2022

Bill To:

Northwest Sr Housing Corp.
 d/b/a The Plaza at Edgemere
 ND TX DAL 22-30659
 File No. 43415

Date	Description	Hours/Qty	Rate	Amount
10/3/2022	Finish drafting 3d report (1.1) and EML Ex Dir and Plaza Admin for accuracy review (.1); review article in reorg from Ex Dir (.1); review Aug QAPI (.3); follow-up call Ex Dir re report (.4); follow-up call with Plaza Admin re COVID status for report (.1); Report edits after Ex Dir Call (.2); Final report edits (.5)	2.7	395.00	1,066.50
10/5/2022	Docket monitoring and review at level consistent with role - DE 686 to 690 relative to hearing outcomes and continued hearing	0.2	395.00	79.00
10/11/2022	follow up FTI re question on timing Jul/Aug mo fee app and 1st Int payment along with fee app questions of frequency relative to total fees (.2); Prepare Exhib B for Sept	0.2	395.00	79.00
10/12/2022	Docket monitoring and pleading review at level consistent with case role [DEs 704-705 orders]	0.3	395.00	118.50
10/14/2022	Docket monitoring and pleading review at level consistent with case role [DE 706 NOA]	0.1	395.00	39.50
10/17/2022	Docket monitoring and pleading review at level consistent with case role [DE 706 NOA]	0.1	395.00	39.50
10/18/2022	Intro call with new DON (48 min - bill 0.7); finalize and file CNO re 2d mo fees (.2)	0.9	395.00	355.50
10/21/2022	ABI article to Ex Dir and UST (.2); manage travel timing of fourth SV (.2); Update call with Ex Dir (.3)	0.7	395.00	276.50
10/24/2022	Docket monitoring and pleading review at level consistent with role [DEs 721- 722] (LL Obj and Witness List) (.1); Prepare 3d monthly fee app (0.9)	1	395.00	395.00
10/25/2022	Docket monitoring and agenda 10/26 hearing review	0.1	395.00	39.50
10/26/2022	Listen to portion of hearing dealing with exclusivity and timing of case milestones relative to cash collateral concerns	1.8	395.00	711.00
10/26/2022	Begin preparation 2d int fee application	0.5	395.00	197.50

Total

Payments/Credits

Balance Due



Pivot Health Law, LLC

P.O. Box 69734
 Oro Valley, AZ 85737

Invoice

Invoice #: 1245
Invoice Date: 11/5/2022

Period: October 2022

Bill To:

Northwest Sr Housing Corp.
 d/b/a The Plaza at Edgemere
 ND TX DAL 22-30659
 File No. 43415

Date	Description	Hours/Qty	Rate	Amount
10/27/2022	Review pleadings associated with hearing outcomes and new deadlines [DEs 738-39] (.1); Subtotal Professional Fees	0.1	395.00	39.50
10/20/2022	NWSH SV4 AIRFARE (SPLIT)		335.98	335.98
10/24/2022	NWSH Postage for 3d Mo Fee App		4.80	4.80
	Total Reimbursable Expenses			340.78

Total	\$3,777.28
Payments/Credits	\$0.00
Balance Due	\$3,777.28



Pivot Health Law, LLC

P.O. Box 69734
 Oro Valley, AZ 85737

Invoice

Invoice #: 1252
Invoice Date: 12/13/2022

Period: November 2022

Bill To:

Northwest Sr Housing Corp.
 d/b/a The Plaza at Edgemere
 ND TX DAL 22-30659
 File No. 43415

Date	Description	Hours/Qty	Rate	Amount
11/2/2022	docket monitoring and pleading review at level consistent with role [DEs 749 - 755 noted with competing plans] high level review of documents with more detailed review to follow (.3)	0.3	395.00	118.50
11/3/2022	Docket monitoring and additional pleading review [DE 757 vs 754] (.2); hearing notice dates and NOA [DE 756, 758] (.1)	0.3	395.00	118.50
11/5/2022	Prepare Exhib B Oct 22	0.2	395.00	79.00
11/7/2022	TXTs and calendar invite for occurrence with facility ExDir (.1); attempt to reach Ex Dir and call with DON (.1); docket monitoring and pleading review at level consistent with role [DEs 767-769] noting case dynamics relative to voting and time extensions (.2)	0.4	395.00	158.00
11/9/2022	Msg left for resident counsel president re my understanding of incident and status (.1);	0.1	395.00	39.50
11/10/2022	Update call with resident council president re incident and case dynamics relative to residents (.3)	0.3	395.00	118.50
11/14/2022	Review and analyze Sept QAPI file	0.3	395.00	118.50
11/14/2022	Review DE 784 amended DIP and follow up FTI consultant re PCO implications	0.2	395.00	79.00
11/16/2022	Finalize and file CNO re DE 724 (3rd Mo Fees)	0.2	395.00	79.00
11/21/2022	Finalize and file 2015.1 pleading for 4th report	0.1	395.00	39.50
11/21/2022	Prepare and file 4th mo fee app and associated pleadings, serve	1	395.00	395.00
11/21/2022	Initial drafting 2nd interim fee app and associated pleadings	1.5	395.00	592.50
11/22/2022	docket monitoring and pleading review - 2d amend DIP DE 811	0.1	395.00	39.50

Total

Payments/Credits

Balance Due



Pivot Health Law, LLC

P.O. Box 69734
 Oro Valley, AZ 85737

Invoice

Invoice #: 1252
Invoice Date: 12/13/2022

Period: November 2022

Bill To:

Northwest Sr Housing Corp.
 d/b/a The Plaza at Edgemere
 ND TX DAL 22-30659
 File No. 43415

Date	Description	Hours/Qty	Rate	Amount
11/23/2022	Update call from DON and ADON team re COVID status and recent self report background and upcoming site visit scheduling (.2); review DE 820 for potential resident relevance to role (.1)	0.3	395.00	118.50
11/25/2022	pro hac appearances with document updates (DE 821, 823) and DE 829 Obj (.1)	0.1	395.00	39.50
11/27/2022	finalize 2d interim fee app, file, serve (.5); docket monitoring and pleading review relative to upcoming hearings and party positions (DEs 831 - 834) (.2)	0.7	395.00	276.50
11/28/2022	Follow up Resident Counsel Leader re delayed visit (.1); Docket monitoring and pleading review at level consistent with role DE 839 - 840, 845 (.1)	0.2	395.00	79.00
11/29/2022	NWSH DE 848, 849 issues re 11/30 hearing (.2); brief update Ex Dir (.1); Draft 4th report noting site visit delay (.6);	0.9	395.00	355.50
11/30/2022	EML fr FA re budget fees/expenses through end case with review case spend and reponse (.2); attend hearing (.5) update call (finish) with Ex Dir (.2); review Oct QAPI mtg on Sept data (.3)	1.2	395.00	474.00
	Professional Fee Subtotal			3,318.00
11/12/2022	NWSH SV4 AIRFARE (CHANGE RETURN FLIGHT)		-23.00	-23.00
11/21/2022	NWSH 4TH MO FEE APP POSTAGE		4.80	4.80
11/27/2022	NWSH SV4 AIRFARE COST		370.98	370.98
	Total Reimbursable Expenses			352.78

Total	\$3,670.78
Payments/Credits	\$0.00
Balance Due	\$3,670.78



Pivot Health Law, LLC

P.O. Box 69734
 Oro Valley, AZ 85737

Invoice

Invoice #: 1258
Invoice Date: 1/13/2023

Period: December 1 - 31, 2022

Bill To:

Northwest Sr Housing Corp.
 d/b/a The Plaza at Edgemere
 ND TX DAL 22-30659
 File No. 43415

Date	Description	Hours/Qty	Rate	Amount
12/4/2022	finalize placeholder report, file, serve	0.2	395.00	79.00
12/7/2022	Docket monitoring and pleading review - DEs 869 (.4); 870 (.1); 871 (.3)	0.8	395.00	316.00
12/7/2022	Review DE 874 Replacement solicitation procedures	0.4	395.00	158.00
12/8/2022	follow up with CNO re visit	0.1	395.00	39.50
12/9/2022	Update call with Ex Dir	0.2	395.00	79.00
12/12/2022	Docket monitoring and pleading review relative to role - DE 887 W&E for upcoming hearing (.1); DE 898 - 900 with review of redline for directionality of changes (.5)	0.6	395.00	237.00
12/13/2022	Follow up DON and Ex Dir re state visit and confirming site visit (.1); prepare Nov Exhib B (.3)	0.4	395.00	158.00
12/14/2022	1/2 rate non-working travel: TUS to PHX (2.6/2 = 1.3); PHX to DAL (2.4/2 = 1.2); DAL to Hotel (.6/2 = .3)	2.8	395.00	1,106.00
12/15/2022	SV 4 - visit with new nursing leadership; stand-up team; wound/nephrology clinicians; executive leadership; dietary services; AL council president; facilities; therapy leadership; skilled/AL/memory units; AL leadership	7	395.00	2,765.00
12/15/2022	SV4 1/2 rate travel; Hotel to Edgemere am (.3); Edgemere to Love Field (.6); DAL to HOU (1.5); HOU to destination (1.0)= 3.4/2 1.7	1.7	395.00	671.50
12/15/2022	docket monitoring and pleading review - DE 914 Debt reply resident obj	0.2	395.00	79.00
12/16/2022	docket review of various orders and text docket entries relative to previous day hearings (.2); follow up email exchg with resident council president (.2);	0.4	395.00	158.00
12/19/2022	Docket monitoring and pleading review consistent with role - review DE 937 relative to resident records (.4); review DE 936, 935, 934 -	0.6	395.00	237.00

Total

Payments/Credits

Balance Due



Pivot Health Law, LLC

P.O. Box 69734
 Oro Valley, AZ 85737

Invoice

Invoice #: 1258
Invoice Date: 1/13/2023

Period: December 1 - 31, 2022

Bill To:

Northwest Sr Housing Corp.
 d/b/a The Plaza at Edgemere
 ND TX DAL 22-30659
 File No. 43415

Date	Description	Hours/Qty	Rate	Amount
12/20/2022	finalize/file CNO for 4th mo fee (.1); review DE 943 amended order (.1)	0.2	395.00	79.00
12/21/2022	docket monitoring and pleading review at level consistent with role DEs 945, 946, 948	0.1	395.00	39.50
12/21/2022	Review DE 955 (.1); finalize CNO 2nd Int Fee and order upload, file (.2)	0.3	395.00	118.50
12/22/2022	Prepare 5th monthly fee statement	1.1	395.00	434.50
12/22/2022	Review DE 955 - revision to executory K rejections	0.1	395.00	39.50
12/27/2022	Docket monitoring and pleading review at level consistent with role - DE 969 amended cash collateral (.1)	0.1	395.00	39.50
12/28/2022	Docket monitoring for case pacing and calendar/hearing updates - DE 976 Hrg Notice	0.1	395.00	39.50
12/29/2022	Txt and EML exchn g DON and facilities re fire watch(.1); Call with Plaza Admin (.2); EML exchg Ex Dir (.1)	0.4	395.00	158.00
12/30/2022	Docket monitoring and pleading review - DE 980	0.1	395.00	39.50
	Professional Fee Subtotal			7,070.50
12/4/2022	NWSH SV4 AIRFARE Changes (COVID +)		96.00	96.00
12/4/2022	NWSH SV4 AIRFARE (change visit for COVID)		342.98	342.98
12/4/2022	NWSH SV4 AIRFARE (FLIGHT CHANGE DUE TO COVID)		-389.98	-389.98
12/4/2022	NWSH Mailing 2d Int Fee App (11/27 missed Nov Bill)		8.72	8.72
12/14/2022	NWSH SV 4 HOTEL (Doubletree Campbell Centre)		194.80	194.80
12/14/2022	NWSH SV4 MEALS (Doubletree - 8250 Rest/Bar)		22.40	22.40
12/15/2022	NWSH SV4 CAR RENTAL		111.45	111.45
12/17/2022	NWSH SV4 PARKING FEES/TOLLS (PHX Airport)		50.00	50.00

Total

Payments/Credits

Balance Due



Pivot Health Law, LLC

P.O. Box 69734
Oro Valley, AZ 85737

Invoice

Invoice #: 1258
Invoice Date: 1/13/2023

Period: December 1 - 31, 2022

Bill To:

Northwest Sr Housing Corp.
d/b/a The Plaza at Edgemere
ND TX DAL 22-30659
File No. 43415

Date	Description	Hours/Qty	Rate	Amount
12/22/2022	NWSH 5th Mo Fee App Postage Total Reimbursable Expenses		4.80	4.80 441.17

Total \$7,511.67

Payments/Credits \$0.00

Balance Due \$7,511.67



Pivot Health Law, LLC

P.O. Box 69734
 Oro Valley, AZ 85737

Invoice

Invoice #: 1264
Invoice Date: 2/10/2023

Period: January 1 - 31, 2023

Bill To:

Northwest Sr Housing Corp.
 d/b/a The Plaza at Edgemere
 ND TX DAL 22-30659
 File No. 43415

Date	Description	Hours/Qty	Rate	Amount
1/3/2023	docket monitoring and notice document updates - DE 987 and 989 (.1); review pleadings 982, 983, 984, 990, 992 at level consistent with role (.2)	0.3	395.00	118.50
1/5/2023	Update call AUST	0.2	395.00	79.00
1/7/2023	Docket monitoring and pleading review at level to keep up case pacing and dynamics - DE 1007 obj	0.1	395.00	39.50
1/9/2023	Docket monitoring and pleading review consistent with role - DE 1014 withdrawal; NOA DE 1012 with document updates (.1)	0.1	395.00	39.50
1/11/2023	Calls x2 with DON re litigation hold	0.5	395.00	197.50
1/11/2023	EML to AUST re litigation doc hold (.1); docket monitoring with flurry filings relative to upcoming hearing with review of DEs 1024, 1025, and 1029 for case dynamic tracking in lieu of hearing attendance (.3)	0.4	395.00	158.00
1/12/2023	EML exchange and follow up call with AUST (.4); docket monitoring and review of DE 1033 (.1)	0.5	395.00	197.50
1/13/2023	Update call with Ex Dir re discussion with AUST and EML coming and report topics (.2); Draft EML and send to AUST for litmus test before sending out (.2)	0.4	395.00	158.00
1/16/2023	Prepare Exhib B Dec (.3); final edits and file CNO 5th mo fee (.2); draft EML to AUST for review relative to debtor litigation hold notice topic (.2)	0.7	395.00	276.50
1/17/2023	EML exchg with Ex Dir and Admin re notice issue and follow up request re litigation hold post petition (.1); docket monitoring and pleading review of DE 1047 (.1)	0.2	395.00	79.00

Total

Payments/Credits

Balance Due



Pivot Health Law, LLC

P.O. Box 69734
 Oro Valley, AZ 85737

Invoice

Invoice #: 1264
Invoice Date: 2/10/2023

Period: January 1 - 31, 2023

Bill To:

Northwest Sr Housing Corp.
 d/b/a The Plaza at Edgemere
 ND TX DAL 22-30659
 File No. 43415

Date	Description	Hours/Qty	Rate	Amount
1/19/2023	docket monitoring and pleading review - pro hac update to notice documents [DE 1061 - 1069] notice document update and pleading review for case issues/pacing	0.3	395.00	118.50
1/20/2023	prepare, finalize, file, service 6th mo fee app (.8); prepare, finalize, file 5th 2015.1 (.2); docket monitoring and pleading review relative to role with document/calendar updates DE 1075 and 1081 (.1)	1.1	395.00	434.50
1/24/2023	Review various witness/exhib docket activity with focus on DE 1103 to confirm no PCO attendance needed at hearings	0.2	395.00	79.00
1/26/2023	Docket monitoring and pleading review - LOTS of audio hearing files -light review to make sure all outside resident concerns; update notice document with pro hac (Lombardo) .3	0.3	395.00	118.50
1/31/2023	Review 2 mo QAPI data reports with notes for follow up [.4 ea report] (.8)	0.8	395.00	316.00
1/20/2023	Professional Fees Subtotal			2,409.50
1/20/2023	NWSH Mailing 6th mo fee		4.80	4.80

Total	\$2,414.30
Payments/Credits	\$0.00
Balance Due	\$2,414.30



Pivot Health Law, LLC

P.O. Box 69734
 Oro Valley, AZ 85737

Invoice

Invoice #: 1267
Invoice Date: 3/1/2023

Period: February 1 - 28, 2023

Bill To:

Northwest Sr Housing Corp.
 d/b/a The Plaza at Edgemere
 ND TX DAL 22-30659
 File No. 43415

Date	Description	Hours/Qty	Rate	Amount
2/2/2023	Follow up with DON and facilities director re check in calls for upcoming report	0.1	395.00	39.50
2/3/2023	Initial Drafting 5th report (2.0); update call facilities for report (.3)	2.3	395.00	908.50
2/6/2023	update call DON re report draft and edits (2 calls - 31 min) (.5); initial revisions to report draft (.5); EML team with exchanges Plaza Admin and DON re desk review (.2); additional revisions to report (.4);	1.6	395.00	632.00
2/6/2023	hearing to understand ruling on building issues relative to PCO role, upcoming report and visit deadlines (.5) w/ follow-up facilities (.1); pleading review DEs 1149 - 1150 (.1)	0.7	395.00	276.50
2/7/2023	call w Debtor counsel re implications Jan 6 court rulings on case timing and PCO site visits -20 min (.3); EML exchg Plaza Admin re same (.1)	0.4	395.00	158.00
2/9/2023	Docket monitoring and pleading review at level consistent with role - pleadings DE 1175 - 1177 re Bay 9 position and joinders	0.2	395.00	79.00
2/13/2023	Prepare 6th CNO (.1)	0.1	395.00	39.50
2/14/2023	docket monitoring and pleading review at level consistent with role - DE 1201 Obj to Plan confirmation	0.2	395.00	79.00
2/15/2023	partial listen DE 1213 re case status and dynamics r/t LL/Debtor to check for court decision and impact case timing	0.2	395.00	79.00
2/15/2023	Prepare Exhib B Jan	0.3	395.00	118.50
2/20/2023	Management of docket flurry in advance of upcoming hearing at level consistent with role for issue spotting relative case timing and SV planning and pro hac notice updates- DEs 1241-1248 (.3); 1251 - 52 (.1); 1249-50 (.3)	0.7	395.00	276.50

Total

Payments/Credits

Balance Due



Pivot Health Law, LLC

P.O. Box 69734
 Oro Valley, AZ 85737

Invoice

Invoice #: 1267
Invoice Date: 3/1/2023

Period: February 1 - 28, 2023

Bill To:

Northwest Sr Housing Corp.
 d/b/a The Plaza at Edgemere
 ND TX DAL 22-30659
 File No. 43415

Date	Description	Hours/Qty	Rate	Amount
2/20/2023	Review DE 1233 for K assumptions w/ resident care connections	0.1	395.00	39.50
2/22/2023	docket monitoring and pleading review at level consistent with role - DE 1265 MOR (.1); listen to parts of DE 1260, 61,63 in attempt to understand case status relative to timing (.4)	0.5	395.00	197.50
2/28/2023	review prior notes, QAPI to prepare CNO call (.3); Update call with CNO Plaza (1.0); update call Debtor counsel re case progress/timelines (.2)	1.5	395.00	592.50
	Professional Fee Subtotal			3,515.50
2/16/2023	NWSH SV 5 AIRFARE with changes for car rental availability		545.98	545.98
2/16/2023	NWSH SV 5 AIRFARE with changes for car rental availability		-271.01	-271.01
2/16/2023	NWSH SV 5 AIRFARE with changes for car rental availability		130.02	130.02
2/16/2023	NWSH SV 5 AIRFARE with changes for car rental availability		293.98	293.98
2/16/2023	NWSH SV 5 AIRFARE with changes for car rental availability		-40.00	-40.00
	Total Reimbursable Expenses			658.97

Total	\$4,174.47
Payments/Credits	\$0.00
Balance Due	\$4,174.47



Pivot Health Law, LLC

P.O. Box 69734
 Oro Valley, AZ 85737

Invoice

Invoice #: 1271
Invoice Date: 4/10/2023

Period: March 1 - 31, 2023

Bill To:

Northwest Sr Housing Corp.
 d/b/a The Plaza at Edgemere
 ND TX DAL 22-30659
 File No. 43415

Date	Description	Hours/Qty	Rate	Amount
3/1/2023	Exhib B preparation Feb 23 with category detail (.3); Prepare 7th mo fee app (1.1); prepare 3d Int fee app (1.7)	3.1	395.00	1,224.50
3/3/2023	Update call with Ex Director	0.4	395.00	158.00
3/6/2023	1/2 rate NW travel TUS-PHX-DAL-Location (5.6/2 =)(2.8); call with resident counsel president - AL (.1); call debtor counsel (.2); TXT leaders re arrived and brief call DON (.2)	3.3	395.00	1,303.50
3/7/2023	SV5 - arrive early to see staffing and resident:staff ratios with follow up DON and Plaza Admin (including review AL complaint self report); AL/skilled kitchen team (2.8); meeting resident counsel president and 2 others (.9); AL resident and family interview (1.0); Facilities, Kitchen team; new executive chef/ RD (1.2); memory unit (.5); follow up NYT issue Eddie, Daryl (.5)	6.9	395.00	2,725.50
3/7/2023	check in HR (.5); phone follow up facilities (.1); Attend hearing - partial (Txt court room deputy re speaking and determine next morning better) (1.1); follow up call resident family member (.2);	1.9	395.00	750.50
3/7/2023	1/2 NW travel Edgemere to DAL to PHX to TUS (5.3 less .5 call = 4.8/2 (2.4); follow up call with resident counsel president (2 hours - bill 0.5)	2.9	395.00	1,145.50
3/8/2023	Attend confirmation hearing and express resident concerns (.5); follow up Ex Dir (.3)	0.8	395.00	316.00
3/9/2023	phone follow up re paper concern (.1); DE 1332 and updates relative to pro hac request (.1);	0.2	395.00	79.00
3/16/2023	Update exchange with Ex Dir re timing court ruling	0.1	395.00	39.50

Total

Payments/Credits

Balance Due



Pivot Health Law, LLC

P.O. Box 69734
 Oro Valley, AZ 85737

Invoice

Invoice #: 1271
Invoice Date: 4/10/2023

Period: March 1 - 31, 2023

Bill To:

Northwest Sr Housing Corp.
 d/b/a The Plaza at Edgemere
 ND TX DAL 22-30659
 File No. 43415

Date	Description	Hours/Qty	Rate	Amount
3/21/2023	VMX and EML from landlord counsel re PCO court testimony (.1); follow up call with same (.2); Follow up call with AL resident counsel president (.2); Review follow up email from landlord counsel and Respond to landlord counsel and key professionals re PCO's feedback on topic (.3); follow up call Ex Dir (.1); NOA DE 1355 and document/notice group list updates (.1)	1	395.00	395.00
3/22/2023	follow up EML from landlord atty re my EML	0.1	395.00	39.50
3/22/2023	call with Debtor counsel re LL email (resident implications r/t contingency planning) and my follow up response	0.2	395.00	79.00
3/23/2023	EML exchanges re scheduling of pecuniary loss and confirmation hrs (.1); CNO 3d Int fee (finalize/file) (.1); draft and file 6th 2015.1 notice (.1); sched update call with DON; request w/ Plaza Admin (.2)	0.5	395.00	197.50
3/24/2023	finalize, file CNO 7th mo fee stmt (.1); attend hearing re pecuniary rulings to appreciate burden on estate relative to LL EML/call earlier week re risks of inability to meet conditions and risk to residents (1.5)	1.6	395.00	632.00
3/27/2023	Attend confirmation/sale hearing (ruling announcement on record)	1.7	395.00	671.50
3/28/2023	update call with DON (.5); EML follow up re QAPI data finalization and update request with Plaza Admin (.1)	0.6	395.00	237.00
3/31/2023	EML follow up resident council president (AL) re impact of sale/confirm approval (.1); Plaza Admin re quality follow up call (.1)	0.2	395.00	79.00
	Professional Fee Subtotal			10,072.50

Total

Payments/Credits

Balance Due



Pivot Health Law, LLC

P.O. Box 69734
 Oro Valley, AZ 85737

Invoice

Invoice #: 1271
Invoice Date: 4/10/2023

Period: March 1 - 31, 2023

Bill To:

Northwest Sr Housing Corp.
 d/b/a The Plaza at Edgemere
 ND TX DAL 22-30659
 File No. 43415

Date	Description	Hours/Qty	Rate	Amount
3/1/2023	NWSH Mail 7th Mo (5.04) and 3rd Int (6.96) fee apps		12.00	12.00
3/1/2023	NWSH Postage - mail 3rd Int Fee App to Court		2.46	2.46
3/6/2023	NWSH SV 5 MEALS (Coffee Cartel PHX)		6.44	6.44
3/6/2023	NWSH SV5 MEALS (Pei Wei Take Out)		20.10	20.10
3/7/2023	NWSH SV5 HOTEL (Doubletree Campbell Plaza)		231.41	231.41
3/7/2023	NWSH SV5 CAR RENTAL		210.68	210.68
3/7/2023	NWSH SV5 PARKING FEES/TOLLS		28.00	28.00
3/7/2023	NWSH SV5 MEALS (Starbucks DAL)		14.67	14.67
	Total Reimbursable Expenses			525.76

Total \$10,598.26

Payments/Credits \$0.00

Balance Due \$10,598.26



Pivot Health Law, LLC

P.O. Box 69734
 Oro Valley, AZ 85737

Invoice

Invoice #: 1275
Invoice Date: 5/11/2023

Period: April 1 - 30, 2023

Bill To:

Northwest Sr Housing Corp.
 d/b/a The Plaza at Edgemere
 ND TX DAL 22-30659
 File No. 43415

Date	Description	Hours/Qty	Rate	Amount
4/1/2023	Call with resident council president re current tone post sale/confirm hearing announcements	0.2	395.00	79.00
4/3/2023	Review DE 1377 - facil dir declaration to confirm no outstanding building issues relative to potential resident concerns	0.1	395.00	39.50
4/3/2023	review and analyze Jan QAPI data	0.4	395.00	158.00
4/4/2023	docket monitoring and pleading review at a level consistent with role - DE 1379	0.2	395.00	79.00
4/5/2023	Review and analyze Feb QAPI data for report (.5); Initial Drafting 6th report (1.4)	1.9	395.00	750.50
4/6/2023	EML follow up with Plaza Admin re report draft (.1); Final report edits, file, serve (.4)	0.5	395.00	197.50
4/10/2023	docket monitoring and pleading review at level commensurate with case role - review DE 1398 and follow up Debtor counsel contact re plan effective date (.1); prepare Mar Exhib B (.3)	0.4	395.00	158.00
4/17/2023	Request for additional fee estimate; analysis of anticipated engagement and follow-up to FA (.2)	0.2	395.00	79.00
4/19/2023	docket monitoring and pleading review/analysis relative to role - DE 1414 re confirmation order	0.1	395.00	39.50
4/20/2023	Preparation 8th mo fee app (1.3); review of docket filings (some sealed) relative to ongoing facade issue with TXT follow up to Ex Dir for discussion of impact on case pacing and sale effective date (.1)	1.4	395.00	553.00
4/21/2023	Check in/update call with Ex Dir re case pacing, operational items	0.3	395.00	118.50
4/26/2023	Docket monitoring and pleading review relative to role - DE 1431 Hrg Agenda (.1); follow up DON and Admin Plaza re updates (.1)	0.2	395.00	79.00
4/27/2023	Attend status update hearing to understand outstanding issues, case pacing, and possible resident implications	1.1	395.00	434.50

Total

Payments/Credits

Balance Due



Pivot Health Law, LLC

P.O. Box 69734
Oro Valley, AZ 85737

Invoice

Invoice #: 1275
Invoice Date: 5/11/2023

Period: April 1 - 30, 2023

Bill To:

Northwest Sr Housing Corp.
d/b/a The Plaza at Edgemere
ND TX DAL 22-30659
File No. 43415

Date	Description	Hours/Qty	Rate	Amount
4/20/2023	Professional Fees Subtotal Postage re 8th monthly fee application		5.04	2,765.00 5.04

Total	\$2,770.04
Payments/Credits	\$0.00
Balance Due	\$2,770.04



Pivot Health Law, LLC

P.O. Box 69734
 Oro Valley, AZ 85737

Invoice

Invoice #: 1276
Invoice Date: 6/7/2023

Period: May 1 - 31, 2023

Bill To:

Northwest Sr Housing Corp.
 d/b/a The Plaza at Edgemere
 ND TX DAL 22-30659
 File No. 43415

Date	Description	Hours/Qty	Rate	Amount
5/1/2023	Docket monitoring and pleading review/analysis at level consistent with role - March MOR and TXT to DON to follow up on call rescheduled from Friday	0.2	395.00	79.00
5/3/2023	TXT exchange Debtor counsel requesting update call on case progress and timing relative to upcoming PCO deadlines (.1); Call with Plaza DON (.6)	0.7	395.00	276.50
5/4/2023	EML exchg follow up with Ex Dir re DON check in with follow up introduction to COO new management company for records follow up	0.2	395.00	79.00
5/5/2023	introductory and scheduling EML exchanges with COO of new Plaza management company	0.1	395.00	39.50
5/8/2023	EML exchange with Plaza Admin re self report from MC	0.1	395.00	39.50
5/8/2023	call with management co COO re records transitions (.4); follow up Plaza DON with longer call scheduled (.1)	0.5	395.00	197.50
5/9/2023	Call with Plaza DON re records transitions, resident update (.3); EML follow up Plaza admin re QAPI (.1)	0.4	395.00	158.00
5/10/2023	Attend status hearing to understand case pacing, outstanding issues - relative to report obligations and potential impacts to Plaza teams	0.7	395.00	276.50
5/11/2023	EML exchange FA team re fees to budget	0.1	395.00	39.50
5/11/2023	Prepare Exhibit B April 2023	0.3	395.00	118.50
5/15/2023	Finalize and file CNO 8th Mo Fee App	0.2	395.00	79.00
5/22/2023	Docket monitoring, pleading review, and analysis at level consistent with role - DEs 1514, 1516, 1518, 1520-22, 1524, 1526	1	395.00	395.00

Total

Payments/Credits

Balance Due



Pivot Health Law, LLC

P.O. Box 69734
Oro Valley, AZ 85737

Invoice

Invoice #: 1276
Invoice Date: 6/7/2023

Period: May 1 - 31, 2023

Bill To:

Northwest Sr Housing Corp.
d/b/a The Plaza at Edgemere
ND TX DAL 22-30659
File No. 43415

Date	Description	Hours/Qty	Rate	Amount
5/23/2023	Docket monitoring, pleading review and analysis at level consistent with role to attempt to understand case pacing and potential continued operational impacts relative to sale closure delays - DEs 1498-99 (.1); NOA and follow up DE 1501 (.1); DE 1502-03 (.1); DE 1504 (.1); DE 1505 (.2); DEs 1509, 1511, 1527-28, 1533 (.2); DE 1535 follow up EML resid counsel lead (.3); prepare and file 7th 2015.1 (.3)	1.4	395.00	553.00
5/24/2023	Review and analyze Mar QAPI (.5); Attend hearing - portions relevant to role (.9 + .1 + .6); follow up call with resident council president re same (.3);	2.4	395.00	948.00
5/30/2023	EML Admin Plaza and DON re follow up anticipated effective date and report (.2); follow up debtor counsel re same (.1); Dial in to hearing - then told sealed and dismissed (.2); follow up Ex Dir re delay sale effective (.2)	0.7	395.00	276.50

Total	\$3,555.00
Payments/Credits	\$0.00
Balance Due	\$3,555.00



Pivot Health Law, LLC

P.O. Box 69734
 Oro Valley, AZ 85737

Invoice

Invoice #: 1278
Invoice Date: 6/30/2023

Period: June 1 - 13, 2023

Bill To:

Northwest Sr Housing Corp.
 d/b/a The Plaza at Edgemere
 ND TX DAL 22-30659
 File No. 43415

Date	Description	Hours/Qty	Rate	Amount
6/1/2023	Review Feb/Mar quality data in preparation call with DON (.2); Update call DON (.3); Review and analyze April QAPI (.4); update call with Ex Dir (.2)	1.1	395.00	434.50
6/2/2023	Review notes and QAPI - draft 7th report (1.8); EML to team for accuracy review along with QAPI data EML exchg plaza admin (.1)	1.9	395.00	750.50
6/4/2023	Final report edits - 7th Rpt	0.2	395.00	79.00
6/5/2023	Update with Ex Dir re report accuracy (.1); file/serve (.1)	0.2	395.00	79.00
6/7/2023	Date of court testimony to debtor counsel (.1) and follow up call re references my reports and testimony(.2)	0.3	395.00	118.50
6/7/2023	Prepare Exhib B May 2023	0.3	395.00	118.50
6/13/2023	Docket review re effective date (.2); time for June Exhib B (.3); time for prep 9th Mo fee (1.3); time for prep 4th final fee and associated f/u (1.8)	3.6	395.00	1,422.00
6/13/2023	Professional Fee Subtotal			3,002.00
6/13/2023	NWSH 9th Mo Fee App Postage		5.04	5.04

Total	\$3,007.04
Payments/Credits	\$0.00
Balance Due	\$3,007.04

**Exhibit D
Proposed Form of Order**

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

IN RE:

**NORTHWEST SENIOR HOUSING
CORPORATION, *et al.*,¹**

Debtors.

§
§
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§
§
§
§

CHAPTER 11

CASE NO: 22-30659 (MVL)

(Jointly Administered)

**ORDER APPROVING FOURTH/FINAL FEE APPLICATION OF
SUSAN N. GOODMAN FOR COMPENSATION AND REIMBURSEMENT OF
EXPENSES AS PATIENT CARE OMBUDSMAN FOR PERIOD
April 28, 2022, THROUGH June 13, 2023**

The court having considered the *Forth/Final Application of Susan N. Goodman for Compensation and Reimbursement of Expenses as Patient Care Ombudsman for Period April 28, 2022, through June 13, 2023* (the “**Application**”), and it appearing to the court that (a) the compensation was reasonable and necessary; (b) notice of the Application was sufficient, appropriate, and in accordance with Local Bankruptcy Rules of this District and the Federal Rules of Bankruptcy Procedure; (c) no objections or responsive pleadings have been filed; and, (d) good cause exists to grant the Application;

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.

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED AS FOLLOWS:

1. The Application is APPROVED.
2. The Applicant is awarded, on a final basis, fees of \$66,676.00 and reimbursement of actual and necessary expenses in the amount of \$4,162.55, collectively totaling **\$70,838.55** (the “**Award**”) for services rendered as the Patient Care Ombudsman for the period of April 28, 2022, through June 13, 2023.
3. The Debtors are authorized and directed to pay the Award, inclusive of any applicable fee holdback in satisfaction of all such allowed fees and expenses that have not previously been paid pursuant to the Interim Compensation Order.
4. Nothing in this Order shall prejudice or be deemed or construed as a waiver of any party’s right to object to a final fee application filed with the court in accordance with the Bankruptcy Code on any ground regardless of whether the party objected to a monthly or interim fee application, and this Order shall be without prejudice to any position any party may take with respect to any future fee application in this case.
5. The court retains jurisdiction to hear and determine all matters arising from or related to the interpretation, implementation, or enforcement of this Order.

###END OF ORDER###

SUBMITTED BY:

/s/Susan N. Goodman, RN JD (TX Bar 24117585)
PIVOT HEALTH LAW, LLC
P.O. Box 69734
Oro Valley, Arizona 85737
Ph: (520) 744-7061 | Fax: (520) 575-4075
sgoodman@pivotohealthaz.com
Patient Care Ombudsman