

J. Michael Tibbals
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**ATTORNEYS FOR MERILOU LOVE,
PRESTON LOVE AND LUKE LOVE**

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

In re: § Chapter 11
§
§ Case No. 22-30659 (MVL)
Northwest Senior Housing Corporation, *et* §
al., §
§
Debtors. § Joint Administration Requested

**REFUND CLAIMANTS’ RESPONSE TO EDGEMERE RESIDENTS’ TRUST
FIRST OMNIBUS OBJECTION TO RESIDENT CLAIMS
*(Related to Docket No. 1722)***

COME NOW Merilou Love, Preston Love and Luke Love (“Claimants”) and file this, their Response to Edgemere Residents’ Trust First Omnibus Objection to Resident Claims (“Response”) and respectfully state as follows:

1. Northwest Senior Housing Corporation (“Edgemere”) commenced the above styled bankruptcy case on April 14, 2022. The Court entered its Confirmation Order on April 7, 2023 confirming the *Fourth Amended Chapter 11 Plan of the Plan Sponsors Dated February 17, 2023* [Docket No. 1241] (the "Plan").
2. The Resident Trustee’s Trust First Omnibus Objection to Resident Claims (the “First Omnibus Objection”) states that the Resident Trustee will identify “particular categories of claims that may be targeted for disallowance, reduction and allowance, or reclassification” in order to “avoid possible double recovery or improper recovery by claimants.”



3. The Claimants oppose reclassification of the Proofs of Claim filed by Merilou Love (POC 125 and 130) as to any reclassification of the Claims as general unsecured claims instead of participating refund claims under Category 5 of the Plan.

RESERVATION OF RIGHTS AND JOINDER

4. The Claimants expressly reserve all rights, including to: (i) amend, supplement, revise, or withdraw this Response, (ii) raise other objections to the First Omnibus Objection, and (iii) file responsive pleadings in accordance with applicable rules and/or deadlines.

PRAYER

WHEREFORE, the Claimants respectfully request that this Court grant such relief as this Court deems proper at law or equity as well as any and all further relief to which the Claimants may show themselves justly entitled.

Dated: November 15, 2023.

Respectfully submitted,

By: /s/ J. Michael Tibbals
J. Michael Tibbals
Bar No. 20017500

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on November 15, 2023 the above and foregoing instrument was electronically filed with the Clerk of Court for the United States Bankruptcy Court, Northern District of Texas, using the electronic case filing system of the Court. The electronic case filing system sends a "Notice of Electronic Filing" to all counsel of record who are ECF registrants.

/s/ J. Michael Tibbals
J. Michael Tibbals