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PROPOSED 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)

(Joint Administration Requested)

**REQUEST FOR EMERGENCY CONSIDERATION  
OF CERTAIN “FIRST DAY” MATTERS**

On April 14, 2022, the above-captioned debtors and debtors in possession (the “**Debtors**”) each filed a petition for relief under Chapter 11 of Title 11 of the United States Code (the “**Bankruptcy Code**”). Proposed counsel for the Debtors believes that these cases qualify as “Complex Chapter 11 Cases.” The Debtors need emergency consideration of the following initial case matters (Check those that apply):

☒ *Notice of Designation as a Complex Chapter 11 Bankruptcy Case* [Docket No. 4; Filed 4/14/2022]

<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.



- ☒ *Debtors' Motion for Entry of an Order Pursuant to Bankruptcy Rule 1015(b) and Local Rule 1015-1 (I) Directing Joint Administration of Chapter 11 Cases and (II) Granting Related Relief* [Docket No. 2; Filed 4/14/2022]
- ☒ *Debtors' Motion for Entry of an Order Authorizing the Filing of a Consolidated Mailing Matrix and a Consolidated List of Thirty Largest unsecured Creditors* [Docket No. 5; Filed 4/14/2022]
- ☒ *Debtors' Motion for Entry of an Order Extending Time to File (I) Schedules of Assets and Liabilities; (II) Statements of Financial Affairs, and (III) Reports of Financial Information Required Under Bankruptcy Rule 2015.3* [Docket No. 9; Filed 4/14/2022]
- ☒ *Debtors' Motion for Entry of an Order Authorizing the Implementation of Procedures to Maintain and Protect Confidential Resident and Patient Information* [Docket No. 10; Filed 4/14/2022]
- ☒ *Debtors' Motion for Entry of an Order Authorizing Payment of Prepetition Taxes and Fees* [Docket No. 11; Filed 4/14/2022]
- ☒ *Debtors' Motion for Entry of Interim and Final Orders (I) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service, (II) Deeming the Utility Providers Adequately Assured of Future Performance, and (III) Establishing Procedures for Determining Requests for Additional Adequate Assurance* [Docket No. 15; Filed 4/14/2022]
- ☒ *Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder, (B) Renew, Revise, Extend, Supplement, Change, or Enter Into New Insurance Policies, (C) Pay Brokerage and (II) Granting Related Relief* [Docket No. 17; Filed 4/14/2022]
- ☒ *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. 18; Filed 4/14/2022]
- ☒ *Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing (A) Continued Use of Debtors' Existing Cash Management System, (B) Maintenance of Debtors' Existing Bank Accounts, and (C) Continued Use of Debtors' Existing Business Forms and (II) Granting Related Relief* [Docket No. 19; Filed 4/14/2022]

- ☒ *Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Pay Prepetition Wages, Salaries, Commissions, Employee Benefits, Prepetition Payroll Taxes, and Other Obligations, (B) Maintain Compensation and Benefits Programs, and Pay Related Administrative Obligations, and (C) Make Payroll Deductions, (II) Authorizing Applicable Banks and Other Financial Institutions to Honor and Process Related Checks and Transfers, and (III) Granting Related Relief [Docket No. 20; Filed 4/14/2022]*
- ☒ *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; Filed 4/14/2022]*
- ☒ *Debtors' Application for Entry of an Order (A) Authorizing the Retention and Employment of Kurtzman Carson Consultants LLC as Claims, Noticing and Solicitation Agent, Nunc Pro Tunc to the Petition Date and (B) Granting Related Relief [Docket No. 21; Filed 4/14/2022]*

Dated: April 14, 2022  
Dallas, Texas

**POLSINELLI PC**

/s/Trinitee G. Green

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