

Trinitee G. Green (SBN 24081320)
Polsinelli PC
2950 N. Harwood, Suite 2100
Dallas, Texas 75201
Telephone: (214) 397-0030
Facsimile: (214) 397-0033
tggreen@polsinelli.com

Jeremy R. Johnson (*Pro Hac Vice* Pending)
Brenna A. Dolphin (*Pro Hac Vice* Pending)
Polsinelli PC
600 3rd Avenue, 42nd Floor
New York, New York 10016
Telephone: (212) 684-0199
Facsimile: (212) 684-0197
jeremy.johnson@polsinelli.com
bdolphin@polsinelli.com

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.*,¹

Debtors.

Chapter 11

Case No. 22-30659 (MVL)

(Joint Administration Requested)

**NOTICE OF COMMENCEMENT OF CHAPTER 11 BANKRUPTCY CASES
AND FILING OF CERTAIN FIRST DAY PLEADINGS**

PLEASE TAKE NOTICE that on **April 14, 2022**, the above-captioned debtors and debtors in possession (the “**Debtors**”), each filed a voluntary petition (collectively, the “**Chapter 11 Petitions**”) commencing cases for relief under chapter 11 of the Bankruptcy Code (the “**Chapter 11 Cases**”).

PLEASE TAKE FURTHER NOTICE that a hearing has been scheduled for **April 18, 2022 at 1:30 p.m. (CT)** before the Honorable Michelle V. Larson on the motions and supporting documents requesting certain “first day” relief (collectively, the “**First Day Pleadings**”), which

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.



were filed by the Debtors in connection with the Chapter 11 Cases. The hearing with respect to the below listed First Day Pleadings will be conducted remotely (by video or telephone via the Court's WebEx Platform. For WebEx Video Participation/Attendance: **For WebEx Video Participation/Attendance:** Link: <https://us-courts.webex.com/meet/larson>. **For WebEx Telephonic Only Participation/Attendance:** Dial-In: 1.650.479.3207, Access code: 160 135 6015.

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

2. *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]

3. *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]

4. *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]

5. *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]

6. *Debtors' Motion for Entry of Interim and Final Orders Authorizing Payment of Prepetition Taxes and Fees* [Docket No. 11; Filed 4/14/2022]

7. *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]

8. *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]

9. *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]

10. *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]

11. *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]

12. *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]

13. *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]

PLEASE TAKE FURTHER NOTICE that in support of the Chapter 11 Petitions and First Day Pleadings, the Debtors rely upon the *Declaration of Nick Harshfield in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings* (the "**First Day Declaration**") [Docket No. 7].

PLEASE TAKE FURTHER NOTICE all documents filed in the Chapter 11 Cases may be (i) inspected in the offices of the Clerk of the Bankruptcy Court during normal business hours, at 1100 Commerce Street, Room 1254, Dallas, Texas 75242; (ii) downloaded from the Bankruptcy Court's website at <http://www.txnb.uscourts.gov/>; and (iii) downloaded free of charge at <http://www.kccllc.net/edgemere>. Please note that prior registration with the PACER Service Center and payment of a fee may be required to access such documents from the Bankruptcy Court's website.

Dated: April 14, 2022
Dallas, Texas

POLSINELLI PC

/s/ Trinitee G. Green

Trinitee G. Green (SBN 24081320)
2950 N. Harwood, Suite 2100
Dallas, Texas 75201
Telephone: (214) 397-0030
Facsimile: (214) 397-0033
tggreen@polsinelli.com

– and –

Jeremy R. Johnson (*Pro Hac Vice* Pending)
Brenna A. Dolphin (*Pro Hac Vice* Pending)
600 3rd Avenue, 42nd Floor
New York, New York 10016
Telephone: (212) 684-0199
Facsimile: (212) 684-0197
jeremy.johnson@polsinelli.com
bdolphin@polsinelli.com

PROPOSED COUNSEL TO THE DEBTORS
AND DEBTORS IN POSSESSION