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 (Admitted *Pro Hac Vice*) Brenna A. Dolphin (Admitted *Pro Hac Vice*)

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)

(Jointly Administered)

NOTICE OF AGENDA OF MATTERS SCHEDULED FOR HEARING ON MAY 11, 2022

ADJOURNED MATTERS

1. *Motion for Adequate Protection* [Docket 60]

Response Date: Creditors' Committee's response date: May 16, 2022; Reply date:

May 21, 2022

Status: Adjourned to final hearing on May 26, 2022 @ 9:30 am (CT)

2. Motion for Entry of an Order (I) Authorizing the Debtors to Suspend the Payment of Rent Under 11 U.S.C. Section 365(D)(3) and (II) Granting Related Relief [Docket 127]

Response Date: Creditors' Committee's response date: May 16, 2022; Reply date: May 21, 2022

Status: Adjourned to final hearing on May 26, 2022 @ 9:30 am (CT)

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.



UNCONTESTED MATTERS

1. Debtors' Motion for Entry of Interim and Final Orders Authorizing Payment of Prepetition Taxes and Fees [Docket No. 11]

Response Date: May 4, 2022

<u>Status:</u> This matter will go forward on a final basis.

Related Documents:

- a. Notice of Hearing on First Day Motions [Docket No. 38]
- b. Interim Order Authorizing Payment of Prepetition Taxes and Fees [Docket No. 99]
- c. Certificate of Service [Docket No. 122]
- d. Amended Notice of Hearing [Docket No. 173]
- e. Certificate of Service [Docket No. 186]
- 2. 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]

Response Date: May 4, 2022

<u>Status:</u> This matter will go forward on a final basis.

- a. Notice of Hearing on First Day Motions [Docket No. 38]
- b. Interim Order (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. 95]
- c. Notice of Hearing [Docket No. 113]
- d. Certificate of Service [Docket No. 122]
- e. Amended Notice of Hearing [Docket No. 173]
- f. Certificate of Service [Docket No. 186]
- 3. Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors 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 Fees and (II) Granting Certain Related Relief [Docket No. 17]

Response Date: May 4, 2022

Status: This matter will go forward on a final basis.

Related Documents:

- a. Notice of Hearing on First Day Motions [Docket No. 38]
- b. Interim Order (I) Authorizing the Debtors 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 Fees and (II) Granting Certain Related Relief [Docket No. 96]
- c. Notice of Hearing [Docket No. 113]
- d. Certificate of Service [Docket No. 122]
- e. Amended Notice of Hearing [Docket No. 173]
- f. Certificate of Service [Docket No. 186]
- 4. Debtors' Motion for authority to apply and disburse funds /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 Filed by Debtor Northwest Senior Housing Corporation [Docket 18]

Response Date: May 19, 2022 for Creditors' Committee

Status: This matter is going forward on a second interim basis. Final hearing adjourned to May 26, 2022 @ 9:30 am (CT).

- a. Notice of Hearing on First Day Motions [Docket No. 38]
- b. Interim Order (I) Authorizing the Debtors to (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. 100]
- c. Certificate of Service [Docket No. 122]
- d. *Notice of Hearing* [Docket No. 172]
- e. Amended Notice of Hearing [Docket No. 173]

- f. Certificate of Service [Docket No. 186]
- 5. 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]

Response Date: May 4, 2022, extended to May 19, 2022 for Creditors' Committee

Status: This matter is going forward on a second interim basis. Final hearing adjourned to May 26, 2022 @ 9:30 am (CT).

Related Documents:

- a. Notice of Hearing on First Day Motions [Docket No. 38]
- b. Interim Order (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. 93]
- c. Notice of Hearing [Docket No. 113]
- d. Certificate of Service [Docket No. 122]
- e. Amended Notice of Hearing [Docket No. 173]
- f. Certificate of Service [Docket No. 186]
- 6. 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]

Response Date: May 4, 2022

<u>Status</u>: This matter will go forward on a final basis.

- a. Notice of Hearing on First Day Motions [Docket No. 38]
- b. Interim Order (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. 94]

- c. *Notice of Hearing* [Docket No. 113]
- d. Certificate of Service [Docket No. 122]
- e. Amended Notice of Hearing [Docket No. 173]
- f. Certificate of Service [Docket No. 186]

CONTESTED MATTERS GOING FORWARD

1. 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]

Response Date: May 4, 2022; extended to May 19, 2022 for Creditors' Committee and May 9, 2022 for U.S. Trustee

Status: This matter will go forward on a second interim basis. Final hearing adjourned to May 26, 2022 @ 9:30 am (CT).

- a. Intercity Investment Properties, Inc.'s Limited Objection to Debtors' Motion for DIP Financing and Use of Cash Collateral [Docket No. 59]
- b. Intercity Investment Properties, Inc.'s Brief in Support of Motion for Adequate Protection and Limited Objection to Debtors' Motion for DIP Financing and Use of Cash Collateral [Docket No. 61]
- c. *Notice of Filing Supplemental Exhibit* [Docket No. 72]
- d. Interim Order (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. 112]
- e. *Notice of Hearing* [Docket No. 113]
- f. Amended Notice of Hearing [Docket No. 173]
- g. Certificate of Service [Docket No. 186]

2. Application of Debtors for Authority to Employ and Retain Polsinelli PC as Counsel to the Debtors Nunc Pro Tunc to the Petition Date [Docket No. 39]

Response Date: May 5, 2022, extended to May 9, 2022 for U.S. Trustee

<u>Status</u>: This matter will go forward on a final basis.

Related Documents:

- a. Amended Declaration of Jeremy R. Johnson in Support of the Application of Debtors for Authority to Employ and Retain Polsinelli PC as Counsel to the Debtors Nunc Pro Tunc to the Petition Date [Docket No. 71]
- b. Amended Declaration of Jeremy R. Johnson in Support of the Application of Debtors for Authority to Employ and Retain Polsinelli PC as Counsel to the Debtors Nunc Pro Tunc to the Petition Date [Docket No. 78]
- c. Notice of Hearing [Docket No. 113]
- d. Notice of Filing of Supplemental Exhibit C to Application of Debtors for Authority to Employ and Retain Polsinelli PC as Counsel to the Debtors [Docket No. 165]
- e. Intercity Investment Properties, Inc. Omnibus Limited Objection to (A) Application of Debtors for Authority to Employ and Retain Polsinelli PC as Counsel to the Debtors Nunc Pro Tunc to the Petition Date and (B) Debtors Application for Authority to Employ and Retain FTI Consulting, Inc. as Financial Advisor to the Debtors Effective as of the Petition Date [Docket No. 170]
- f. Amended Notice of Hearing [Docket No. 173]
- g. Certificate of Service [Docket No. 186]
- h. Second Amended Declaration of Jeremy R. Johnson in Support of the Application of Debtors for Authority to Employ and Retain Polsinelli PC as Counsel to the Debtors Nunc Pro Tunc to the Petition Date [Docket No. 189]
- 3. Debtors' Application for Authority to Employ and Retain FTI Consulting, Inc. as Financial Advisor to the Debtors Effective as of the Petition Date [Docket No. 29]

Response Date: May 5, 2022, extended to May 9, 2022 for U.S. Trustee

Status: This matter will go forward on a final basis.

Related Documents:

a. Notice of Hearing on First Day Motions [Docket No. 38]

- b. *Notice of Hearing* [Docket No. 113]
- c. Notice of Filing of Supplement to Application for Authority to Employ and Retain FTI Consulting, Inc. as Financial Advisor to the Debtors [Docket No. 164]
- d. Amended Declaration of Chad J. Shandler in Support of the Debtors' Application for Authority to Employ and Retain FTI Consulting, Inc. As Financial Advisor to The Debtors Effective as of the Petition Date [Docket No. 169]
- e. Amended Notice of Hearing [Docket No. 173]
- f. Certificate of Service [Docket No. 186]

Dated: May 10, 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 (Admitted *Pro Hac Vice*)
Brenna A. Dolphin (Admitted *Pro Hac Vice*)
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