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**COUNSEL TO THE EDGEMERE  
RESIDENTS TRUST**

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

<p>In re:</p> <p>Northwest Senior Housing Corporation, <i>et al.</i>,<sup>1</sup></p> <p style="text-align: center;">Debtors.</p>	§ § § § § §	<p>Chapter 11</p> <p>Case No. 22-30659 (MLV)</p> <p>(Jointly Administered)</p>
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**FIRST AMENDED DECLARATION OF MYRTLE LEMMON,  
FORMER RESIDENT OF EDGEMERE IN SUPPORT OF  
FIRST APPLICATION OF EDGEMERE RESIDENTS TRUST**

I, Myrtle Lemmon, declare under penalty of perjury pursuant to 28 U.S.C § 1746:

1. I was a resident of Edgemere from September 2015 through June 2020, at which time I moved out of Edgemere. Edgemere has re-leased my independent living unit and my refund became fully due and payable prior to June 13, 2023, the Effective Date of the Plan.

2. My husband Harold and I executed the “double occupancy” Edgemere Life Care Agreement attached hereto as **Exhibit A** on September 21, 2015.

<sup>1</sup> The Debtors in these chapter 11 cases (the “**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) (together, the “**Debtors**”). The Debtors’ mailing address is 8523 Thackery Street, Dallas, Texas 75225.



3. We each executed the original Addendum attached hereto as **Exhibit B** on September <sup>29 MKP</sup> 21, 2015 directing Edgemere to pay our refund to the last surviving spouse. Harold died on August 13, 2018 and I therefore became the last surviving spouse and the owner of 100% of the refund. On October 15, 2019 I executed the second Addendum attached hereto as **Exhibit C** directing my refund to be paid to my son, John Eric <sup>Keahey MKP</sup> Keechey. It was always my understanding and intent that the Addendum would only be effective if I died on or before the date the refund became payable. Prior to my death, it was my intent that the second Addendum would not be effective and would be subject to amendment or revocation at my sole discretion.

4. Accordingly, since I am still living, and my second Addendum is only effective upon my death, I have made demand on the Edgemere Residents Trust to make all Trust Distributions attributable to my Refund Claim against Edgemere to me, and not to the addendum payee in the second Addendum.

Dated: September 18, 2023

By: Myrtle Lemmon  
Myrtle Lemmon, Former Edgemere Resident

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