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**COUNSEL TO THE EDMERE  
 RESIDENTS TRUST**

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

In re:	§	
	§	Chapter 11
Northwest Senior Housing Corporation, <i>et al.</i> , <sup>1</sup>	§	
	§	Case No. 22-30659 (MLV)
Debtors.	§	
	§	(Jointly Administered)

**EDMERE RESIDENTS' TRUST JOINDER TO LITIGATION TRUSTEE'S MOTION  
 TO EXTEND THE DEADLINE TO OBJECT TO CLAIMS**

NOW COMES, Stephen A. McCartin, the Trustee of the EdmERE Resident's Trust, and files this *Joinder to Litigation Trustee's Motion to Extend the Deadline to Object to Claims* (the "**Motion**"), and in support thereof would respectfully show the Court as follows:

**I.  
BACKGROUND**

1. On May 22, 2023, the Debtors gave notice of the selection of the Residents Trustee and the Litigation Trustee, who will be responsible for, *inter alia*, reconciling and

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<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.



otherwise resolving certain of the proofs of claim (collectively, the “**Proofs of Claim**”) that have been filed in these Chapter 11 Cases. *See* Docket Nos. 1504 and 1526. Those Proofs of Claim include at least 78 Proofs of Claim filed by current and former residents and patients.

2. On July 25, 2023, the Court entered the *Order Granting Debtors’ Motion to Extend the Deadline to Object to Claims* [Docket No. 1659], which established that objections to claims, if any, shall be filed and served on or before October 4, 2023.

3. On September 8, 2023, Leif M. Clark, trustee (the “**Litigation Trustee**”) of the litigation trust (the “**Litigation Trust**”) filed his *Motion to Extend the Deadline to Object to Claims* [Docket 1694] (the “**Motion**”) for the entry of an order pursuant to section 105 of title 11 of the United States Code (the “**Bankruptcy Code**”) and Rule 9006 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), extending the deadline by which objections to claims must be filed through October 4, 2024.

4. The Residents’ Trust Trustee joins the Litigation Trustee’s Motion, as the Residents’ Trust Trustee also needs additional time to complete the claims reconciliation and dispute resolution process.

**II.**  
**RELIEF REQUESTED**

5.       **WHEREFORE**, based upon the foregoing, the Residents' Trust Trustee joins the Litigation Trustee's Motion, and respectfully request this Court approve the extension of the claims objections deadline or bar date through October 4, 2024, and for such further relief as this Court deems proper.

Dated: October 4, 2023

Respectfully submitted,

/s/ Stephen A. McCartin

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**CERTIFICATE OF SERVICE**

The undersigned certifies that on October 4, 2023, a true and correct copy of the foregoing joinder was served electronically on all parties registered to receive electronic notice of filings in this case via this Court's ECF notification system.

/s/ Stephen A. McCartin

Stephen A. McCartin