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COUNSEL TO LEIF M. CLARK, TRUSTEE
OF THE EDMERE LITIGATION TRUST

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

In re:

Northwest Senior Housing Corporation, *et al.*,

Liquidating Debtors.

Chapter 11

Case 22-30659 (MVL)

(Jointly Administered)

**NOTICE OF FILING PROOF OF PAYMENT
OF ALLOWED ADMINISTRATIVE EXPENSE CLAIMS**

Please take notice that Leif M. Clark, trustee (the “**Trustee**”) of the litigation trust created and established pursuant to section 4.2 of the *Fourth Amended Chapter 11 Plan of the Plan Sponsors Dated February 17, 2023* [Docket No. 1241] (the “**Plan**”) has complied with Section 2.1 of the Plan, which required the Trustee to pay the full amount of an allowed administrative expense claim not later than “thirty (30) days after the date on which an order allowing such Administrative Claim becomes a Final Order of the Bankruptcy Court . . .”

On October 10, 2023, the Court entered the *Agreed Order Granting Litigation Trustee’s First Omnibus Objection to Administrative Claims* [Docket No. 1729] (the “**Order**”), which provided that it “shall be immediately effective and enforceable upon its entry.” Pursuant to the



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Order, ARC Waterproofing Sealant, LLC and Staples, Inc were left with allowed administrative expense claims in the amount of \$425.00 and \$3,947.03, respectively (together, the “**Allowed Claims**”). Additionally, the Trustee did not object to the asserted administrative expense claim of Airgas, USA in the amount of \$130.34 (the “**Airgas Claim**”). Attached hereto as Exhibit Group A is proof of payment and satisfaction of the Allowed Claims and the Airgas Claim.

Dated: November 9, 2023
Dallas, Texas

Respectfully submitted,

POLSINELLI PC

/s/ Trinitee G. Green

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– and –

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COUNSEL LEIF M. CLARK, TRUSTEE
OF THE EDGEMERE LITIGATION TRUST

CERTIFICATE OF SERVICE

The undersigned certifies that on November 9, 2023 she caused a copy of the foregoing *Notice of Filing Proof of Payment of Allowed Administrative Expense Claims* to be filed electronically using the CM/ECF system, which provides service of the foregoing notice on the parties registered to receive ECF notice.

/s/ Trinitee G. Green

Trinitee G. Green

EXHIBIT GROUP A

(Proof of Payment)

Exhibit A

Disbursement Request

Date: November 1, 2023

To: Stretto, Inc.
FAX # []
410 Exchange, Ste. 100
Irvine, CA 92602
Attention: Fred Brown
Telephone: (714) 716-1988
Email: disbursingagent@stretto.com

Pursuant to that Deposit Management Services Agreement entered into on June 19, 2023, by and among Stretto, Inc. and Hon. Leif M. Clark (Ret.), solely in his capacity as Litigation Trustee, In re Northwest Senior Housing Corporation, et al. (the "Trustee"), the Trustee hereby requests the disbursement in the amount and manner described below from account number [].

Please disburse to: Administrative Claims (per attached schedule)Disbursement Address: See attached scheduleAmount to disburse: \$4,502.37Form of disbursement: Bill pay via bank check(s)

TRUSTEE

By: 

Name:

Title:

Table 1

[illegible]

	ID KCC Claim #	
1	116	
2	181	
3	153	

From: Nick Aguilera Nick.Aguilera@stretto.com
Subject: RE: Disbursement - Bill Pay to Administrative Claimants
Date: November 1, 2023 at 7:05 PM
To: lmclark leifmclark.com lmclark@leifmclark.com

NA

Hi Leif,

These checks have been sent for mailing.

Cheers,

Nick Aguilera (he/him)
Associate, DD&E

From: Nick Aguilera <Nick.Aguilera@stretto.com>
Sent: Tuesday, October 31, 2023 12:41 PM
To: lmclark leifmclark.com <lmclark@leifmclark.com>
Cc: Stretto DDE <disbursingagent@stretto.com>
Subject: RE: Disbursement - Bill Pay to Administrative Claimants

Hi Leif,

Your request has been received. I will give you a call shortly to confirm authenticity of this request.

Cheers,

Nick Aguilera (he/him)
Associate, DD&E

From: lmclark leifmclark.com <lmclark@leifmclark.com>
Sent: Tuesday, October 31, 2023 12:35 PM
To: Stretto DDE <disbursingagent@stretto.com>
Subject: Disbursement - Bill Pay to Administrative Claimants

[External Email]

Attached is a disbursement request for three entities, to be paid by issuing checks. I have hopefully followed the directions received from Stephen Cady.

Leif Clark, Trustee
Edgemere Litigation Trust

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