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the Estate of Patricia Adams,
and Andrew L. Adams*

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

In re:	§	Chapter 11
	§	
Northwest Senior Housing Corporation, <i>et</i>	§	Case No. 22-30659 (MVL)
<i>al.</i> ,	§	
Debtors.	§	Joint Administration Requested

**PARTICIPATING REFUND CLAIMANTS' RESPONSE TO EDGEMERE
RESIDENTS' TRUST FIRST OMNIBUS OBJECTION TO RESIDENT CLAIMS**

(Related to ECF No. 1722)

COMES NOW Pamela Siviglia, the Estate of Patricia Adams, and Andrew L. Adams
 (“Participating Refund Claimants”) and files this their Response to Edgemere Residents’ Trust
First Omnibus Objection to Resident Claims (“Response”) and respectfully states as follows:

1. On April 14, 2022, Northwest Senior Housing Corporation (“Edgemere”) commenced the
above styled bankruptcy case by filing a Voluntary Petition for Non-Individuals under
Chapter 11 of Title 11 of the United States Code, 11 U.S.C. §§ 101 et seq. (“Bankruptcy
Code”) in the above styled court.



2. On April 7, 2023, the Court entered *Findings of Fact, Conclusions of Law, and Order Confirming Chapter 11 Plan of Plan Sponsors* [Docket Nos. 1393, 1394] (the "Confirmation Order"), confirming the *Fourth Amended Chapter 11 Plan of the Plan Sponsors Dated February 17, 2023* [Docket No. 1241] (the "Plan").
3. The Resident Trustee, as part of the Edgemere Residents' Trust First Omnibus Objection to Resident Claims (the "First Omnibus Objection"), explains that the Residents' Trust is reviewing proofs of claim filed by former residents, including the claim filed on behalf of the Participating Refund Claimants.
4. The Trustee's process includes "identifying particular categories of claims that may be targeted for disallowance, reduction and allowance, or reclassification."
5. Further, the Trustee states that the First Omnibus Objection is filed to "avoid possible double recovery or improper recovery by claimants."
6. The Participating Refund Claimants oppose reclassification of the proof of claim filed by Pamela Siviglia to the extent the Residents Trust seeks to reclassify her claim as a general unsecured claim instead of a participating refund claim under Category 5 of the Plan. Pamela Siviglia is named as the payee of the resident refund claim on the addendum to the Lifecare Agreement signed by Patricia Adams, deceased, and the Edgemere prior to the filing of this case.
7. The Participating Refund Claimants oppose reclassification of the proof of claim filed by the Estate of Patricia Adams to the extent the Residents Trust seeks to reclassify her claim as a general unsecured claim instead of a participating refund claim under Category 5 of the Plan.

8. The Refund Claimants oppose reclassification of the proof of claim filed by the Estate of Patricia Adams to the extent the Residents Trust seeks to reclassify her claim as a general unsecured claim instead of a participating refund claim under Category 5 of the Plan.

RESERVATION OF RIGHTS AND JOINDER

9. The Participating Refund Claimants expressly reserve all rights, including to: (i) amend, supplement, revise, or withdraw this Response, (ii) raise other objections to the First Omnibus Objection, and (iii) file responsive pleadings in accordance with applicable rules and/or deadlines.

PRAYER

WHEREFORE, the Participating Refund Claimants respectfully request that this Court grant such relief as this Court deems proper at law or equity as well as any and all further relief to which the Participating Refund Claimants may show themselves justly entitled.

Dated: November 14, 20223

Respectfully submitted,

/s/ Benton Williams II
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