

Bradley R. Foxman (Texas Bar No. 24065243)  
 Sara E. Zoglman (Texas Bar No. 24121600)  
**VINSON & ELKINS LLP**  
 2001 Ross Avenue, Suite 3900  
 Dallas, TX 75201  
 Tel: 214.220.7700  
 Fax: 214.220.7716  
 bfoxman@velaw.com; szoglman@velaw.com

**COUNSEL TO INDEPENDENT CO-EXECUTORS TO  
 THE ESTATE OF DOROTHY COLLINS TORBERT**

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

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

**NOTICE OF APPEARANCE  
 AND REQUEST FOR SERVICE AND NOTICE**

---

**PLEASE TAKE NOTICE** that the undersigned appears as counsel to Michael James Collins, Nancy Collins Fisher, and Stuart Maryman Bumpas, as Independent Co-Executors to the Estate of Dorothy Collins Torbert (such co-executors, collectively, the “*Co-Executors*”), in the above referenced chapter 11 case, and hereby files this *Notice of Appearance and Request for Service and Notice* (this “*Notice of Appearance*”) pursuant to sections 342 and 1109(b) of title 11 of the United States Code (the “*Bankruptcy Code*”), Rules 2002, 3017, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (the “*Bankruptcy Rules*”), and the Local Rules of the United States Bankruptcy Court for the Northern District of Texas (the “*Local Rules*”), and

---

<sup>1</sup> 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 (2699).



requests that copies of all notices and pleadings given or required to be given in the chapter 11 cases be served upon:

Bradley R. Foxman  
Sara E. Zoglman  
**VINSON & ELKINS LLP**  
2001 Ross Avenue  
Suite 3900  
Dallas, TX 75201  
Tel: (214) 220-7700  
Fax: (214) 220-7716  
bfoxman@velaw.com  
szoglman@velaw.com

**PLEASE TAKE FURTHER NOTICE** that the above request includes all notices required by the Bankruptcy Code and the Bankruptcy Rules and also includes, without limitation, the schedules, statements of financial affairs, operating reports, any plan of reorganization or disclosure statement, any letter, application, motion, complaint, objection, claim, demand, hearing, petition, pleading or request, whether formal or informal, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex or otherwise filed with or delivered to the Bankruptcy Clerk, Clerk, Court, or Judge (as those terms are defined in Bankruptcy Rule 9001) in connection with and with regard to the above referenced bankruptcy case and any proceedings related thereto.

**PLEASE TAKE FURTHER NOTICE** that the undersigned counsel hereby requests that the name and address of the counsel set forth above be added to all mailing matrices in this case.

**PLEASE TAKE FURTHER NOTICE** that the Co-Executors do not consent to or waive any rights, claims, actions, or defenses through the filing and service of this Notice of Appearance with respect to jurisdiction under the Bankruptcy Code, and strictly reserves such rights, including: (i) the right to trial by jury in any proceeding triable in this chapter 11 case or any case, controversy, or proceeding related to this chapter 11 case, (ii) the right to have final orders in non-

core matters entered only with *de novo* review by the applicable United States District Court for the Northern District of Texas, and (iii) the right to seek to withdraw the reference in any matter subject to mandatory or discretionary withdrawal.

*[Remainder of Page Intentionally Left Blank]*

Dated: November 20, 2023

Respectfully submitted,

/s/ Bradley R. Foxman

**VINSON & ELKINS LLP**

Bradley R. Foxman (Texas Bar No. 24065243)

Sara E. Zoglman (Texas Bar No. 24121600)

2001 Ross Avenue, Suite 3900

Dallas, TX 75201

Tel: 214.220.7700

Fax: 214.220.7716

bfoxman@velaw.com; szoglman@velaw.com

**COUNSEL TO INDEPENDENT CO-  
EXECUTORS TO THE ESTATE OF  
DOROTHY COLLINS TORBERT**

**CERTIFICATE OF SERVICE**

I certify that on November 20, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas.

/s/ Bradley R. Foxman  
One of Counsel