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*Counsel for Intercity Investment Properties,
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:

NORTHWEST SENIOR HOUSING CORPORATION,
*et al.*¹

Debtors.

Chapter 11

Case No. 22-30659 (MVL)

**INTERCITY INVESTMENT PROPERTY, INC.'S
MOTION TO SUBSTITUTE COUNSEL**

Intercity Investment Properties, Inc. (“ICI”) respectfully moves the Court, pursuant to L.B.R. 2091-1, to permit the withdrawal of its current attorneys from Levenfeld Pearlstein, LLC (“LP”) and Nelson Mullins Riley & Scarborough LLP (“Nelson Mullins” and, with LP, “Withdrawing Counsel”) and the entry of new counsel in ICI’s behalf. In support thereof, ICI respectfully states as follows.

1. LP has represented ICI in these bankruptcy cases since April 2022.

¹ 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 (2669). The Debtors’ mailing address is 8523 Thackery Street, Dallas, Texas 75225.



2. Nelson Mullins has represented ICI as local co-counsel in these bankruptcy cases since June 2024.

3. The Debtors' chapter 11 plan was confirmed on April 7, 2023.

4. There are no deadlines in these chapter 11 cases related to ICI.

5. Following Withdrawing Counsel's withdrawal, ICI will be represented by the following attorneys in these bankruptcy cases: Garrick Smith, John Cornwell, and Jamil Alibhai. Messrs. Smith and Alibhai's address is 500 N. Akard Street, Suite 4000, Dallas, Texas 75201. Mr. Cornwell's address is 700 Milam Street, Suite 800, Houston, Texas 77002.

6. Pursuant to L.B.R. 7007-1(a), ICI states that there are no parties affected by the requested relief with whom to confer.

WHEREFORE, the Intercity Investment Properties, Inc. respectfully requests that (a) Withdrawing Counsel be granted leave to withdraw as counsel to ICI in these bankruptcy cases, (b) that the withdrawal of the undersigned be deemed effective *instantly* upon entry of the order granting this Motion, and (c) that the Court grant such other or additional relief as the Court deems just and appropriate in the circumstances.

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Dallas, Texas
June 2, 2025

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Counsel for Intercity Investment Properties, Inc.

CERTIFICATE OF SERVICE

I certify that on this 2nd day of June, 2025, a copy of the foregoing was filed electronically with the Clerk of Court via ECF, which caused a copy of same to be transmitted to all counsel of record.

/s/ Ryan C. Hardy
Ryan C. Hardy

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Case No. 22-30659 (MVL)

**ORDER GRANTING THE MOTION OF INTERCITY INVESTMENT
PROPERTIES, INC. FOR SUBSTITUTION OF COUNSEL**

Before the Court is Intercity Investment Property, Inc.'s ("ICI") *Motion to Substitute Counsel* (the "Motion," ECF ____) requesting leave for ICI's current counsel to withdraw as counsel in these bankruptcy cases and for new counsel to appear for ICI upon such withdrawal. The Court having found that reasonable and proper notice of the Motion and the hearing on it was given; and, having considered the Motion and the arguments of counsel, for the reasons stated on the record and for good cause shown,

¹ 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 (2669). The Debtors' mailing address is 8523 Thackery Street, Dallas, Texas 75225.

IT IS HEREBY ORDERED that the Motion is Granted as follows: Levenfeld Pearlstein, LLC and Nelson Mullins Riley & Scarborough LLP are given leave to withdraw and their attorneys are deemed to have done so *instantly*. ICI's new attorneys are directed to file entries of appearance within three (3) business days of the entry of this Order.

END OF ORDER