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COUNSEL TO THE DEBTORS AND
DEBTORS IN POSSESSION

**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)

(Jointly Administered)

**DEBTORS' REQUEST FOR EXPEDITED HEARING ON
DEBTORS' MOTION FOR ENTRY OF AN ORDER
EXTENDING THE SEAL LIFTING DATE**

The debtors and debtors-in-possession (the “**Debtors**”) in the above-captioned cases (the “**Chapter 11 Cases**”) file the *Debtors' Request for Expedited Hearing on Debtors' Motion for Entry of an Order Extending the Seal Lifting Date* (the “**Request**”) and in support of this Request, the Debtors respectfully state as follows:²

1. Contemporaneously with filing this Request the Debtors filed the *Debtors' Motion for Entry of an Order Extending the Seal Lifting Date* [Docket No. 616] (the “**Motion**”).

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 Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.



2. By filing this Request, the Debtors request that the Court set the Motion for hearing on **September 21, 2022 at 9:30 a.m.** and further request that the Court establish **September 18, 2022 at 12:00 p.m. (CT)** as the deadline to object to the Motion.

3. Expedited consideration of the Motion is appropriate because the relief requested in the Motion impacts the date by which Debtor Northwest Senior Housing Corporation, as plaintiff, must disclose experts in the adversary proceeding against Intercity Investment Properties, Inc. and Kong Capital, LLC [Adv. Pro. 22-03040] (the “**Adversary**”). Specifically, contemporaneously herewith, the Debtors filed the *Motion to Modify Amended Scheduling Order* [Docket No. 137 (the “**Motion**”) in the Adversary, requesting, among other things, the establishment of November 29, 2022 as the deadline by which parties in the Adversary must disclose names and addresses of experts. The relief requested herein will not harm or prejudice parties in interest. On the other hand, if the sealing of the Notice (as defined in the Motion) is lifted on September 12, 2022, the Debtors and their estates will be significantly prejudiced for the reasons set forth in the Motion.

4. Based on the foregoing, the Debtors believe that it is in the best interest of the Debtors’ estates for the Motion to be set on an expedited basis.

WHEREFORE, the Debtors respectfully request that the Court enter an order setting the Motion for a hearing as requested above and granting such other and further relief as it deems just and proper.

[Signature on the following page]

Dated: September 9, 2022
Dallas, Texas

POLSINELLI PC

/s/ Trinitee G. Green

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– and –

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