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COUNSEL TO THE DEBTORS AND
 DEBTORS IN POSSESSION AND
 PLAINTIFF AND COUNTER-
 DEFENDANT

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

<p>In re:</p> <p>Northwest Senior Housing Corporation, <i>et al.</i>,¹</p> <p style="text-align: center;">Debtors.</p>	<p>Chapter 11</p> <p>Case No. 22-30659 (MVL)</p>
<p>Northwest Senior Housing Corporation,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>Intercity Investment Properties, Inc. and Kong Capital, LLC,</p> <p style="text-align: center;">Defendants.</p>	<p>Adv. No. 22-03040 (MVL)</p>
<p>Intercity Investment Properties, Inc.,</p> <p style="text-align: center;">Counter-Plaintiff,</p> <p style="text-align: center;">v.</p> <p>Northwest Senior Housing Corporation,</p> <p style="text-align: center;">Counter-Defendant.</p>	

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.



**NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON DECEMBER 15, 2022, AT 1:30 P.M. (CT)**

WITHDRAWN MATTERS NOT GOING FORWARD:

1. *Motion of the Debtors for an Order (A) Approving Disclosure Statement and (B) Granting Related Relief* [Docket No. 757]

Response Date: November 28, 2022
Extended to December 6, 2022

Status: This matter has been withdrawn.

Related Documents:

- a. Joint Plan of Reorganization Proposed by the Committee and the Debtors [Docket No. 750]
- b. Disclosure Statement in Support of Joint Plan of Reorganization Proposed by the Committee and the Debtors [Docket No. 751]
- c. Certificate of Service [Docket No. 776]
- d. Notice of Hearing of Motion of the Debtors for an Order (A) Approving Disclosure Statement and (B) Granting Related Relief [Docket No. 772]
- e. Certificate of Service [Docket No. 782]
- f. Notice of Withdrawal [Docket No. 885]
- g. Certificate of Service [Docket No. 903]

Response(s):

- a. Bank of America, N.A.'s Objection to: (I) Debtors' Disclosure Statement Motion; and (II) Trustee's Disclosure Statement Motion [Docket No. 845]
- b. Brad B. Blumenthal's Objection to (I) Debtors' Disclosure Statement Motion; and (II) Trustee's Disclosure Statement Motion [Docket No. 853]

2. *Application of Debtors for Authority to Employ and Retain Gordon Brothers Asset Advisors, LLC as Appraiser Effective as of November 16, 2022* [Docket No. 815]

Response Date: December 15, 2022

Status: This matter has been withdrawn.

Related Documents:

- a. Notice of Hearing of Application of Debtors for Authority to Employ and Retain Gordon Brothers Asset Advisors, LLC as Appraiser Effective as of November 16, 2022 [Docket No. 816]
- b. Certificate of Service [Docket No. 844]
- c. Notice of Withdrawal [Docket No. 884]
- d. Certificate of Service [Docket No. 903]

Response(s): None.

UNCONTESTED MATTERS GOING FORWARD:

3. *Motion of Debtors for Entry of an Order Further Extending Time to File Notices of Removal of Civil Actions* [Docket No. 769]

Response Date: December 1, 2022

Status: This matter is going forward.

Related Documents:

- a. Notice of Hearing [Docket No. 770]
- b. Certificate of Service [Docket No. 782]

Response(s): None.

4. *Motion of Trustee and DIP Lender for Entry of an Order (I) Authorizing and Approving the Bidding Procedures; (II) Authorizing and Approving the Stalking Horse Asset Purchase Agreement; (III) Approving Procedures Related to the Assumption of Certain Contracts and Unexpired Leases; (IV) Scheduling Combined Confirmation and Sale Hearing; and (V) Granting Related Relief* [Docket No. 755]

Response Date: November 28, 2022
Extended to December 12, 2022

Status: Adjourned from November 30, 2022; this matter is going forward.

Related Documents:

- a. Plan of Reorganization of the Trustee and DIP Lender Dated November 2, 2022 [Docket No. 752]
- b. Disclosure Statement for the Plan of Reorganization of the Trustee and DIP Lender Dated November 2, 2022 [Docket No. 753]
- c. Notice of hearing to Consider Approval of (I) Disclosure Statement in Support of Joint Plan of Reorganization Proposed By the Committee and the Debtors and Related Solicitation Materials and Notices, (II) Disclosure Statement in Support of Plan of Reorganization Proposed by Trustee and DIP Lender and Related Solicitation Materials and Notices, and (III) Bidding Procedures, Stalking Horse Asset Purchase Agreement and Related Notices in Connection with the Plan Proposed by Trustee and DIP Lender [Docket No. 756]
- d. Certificate of Service [Docket No. 765]
- e. Certificate of Service [Docket No. 776]
- f. Notice of Filing Revised and Supplemental Documents in Support of Motion of Trustee and DIP Lender for Entry of an Order (I) Authorizing and Approving the Bidding Procedures; (II) Authorizing and Approving the Stalking Horse Asset Purchase Agreement; (III) Approving Procedures Related to the Assumption of Certain Executory Contracts and Unexpired Leases; (IV) Scheduling Combined Confirmation and Sale Hearing; and (V) Granting Related Relief [Docket No. 755]
- g. Certificate of Service [Docket No. 801]
- h. Certificate of Service [Docket No. 819]
- i. Certificate of Service [Docket No. 866]
- j. Notice of Filing of Revised and Supplemental Documents in Support of Motion of Trustee and DIP Lender for Entry of an Order (I) Authorizing and Approving the Bidding Procedures; (II) Authorizing and Approving the Stalking Horse Asset Purchase Agreement; (III) Approving Procedures Related to the Assumption of Certain Executory

Contracts and Unexpired Leases; (IV) Scheduling Combined Confirmation and Sale Hearing; and (V) Granting Related Relief [Docket No. 872]

k. Notice of Hearing [Docket No. 867]

l. Certificate of Service [Docket No. 877]

Response(s): None.

5. *Debtors', Trustee and DIP Lender's Motion for an Order (I) Establishing Voting Record Date and Other Deadlines; (II) Authorizing Kurtzman Carson Consultants LLC to Act as the Singular Voting Agent with Respect to the Competing Plans; (III) Approving Solicitation and Notice Procedures with Respect to Competing Plans; (IV) Approving Manner and Forms of Ballots, Notices and Related Documents; and (V) Granting Related Relief* [Docket No. 767]

Response Date: November 28, 2022
Extended to December 6, 2022

Status: Adjourned from November 30, 2022; this matter is going forward.

Related Documents:

- a. Plan of Reorganization of the Trustee and DIP Lender Dated November 2, 2022 [Docket No. 752]
- b. Disclosure Statement for the Plan of Reorganization of the Trustee and DIP Lender Dated November 2, 2022 [Docket No. 753]
- c. Notice of Hearing to Consider Approval of (I) Disclosure Statement in Support of Joint Plan of Reorganization Proposed By the Committee and the Debtors and Related Solicitation Materials and Notices, (II) Disclosure Statement in Support of Plan of Reorganization Proposed by Trustee and DIP Lender and Related Solicitation Materials and Notices, and (III) Bidding Procedures, Stalking Horse Asset Purchase Agreement and Related Notices in Connection with the Plan Proposed by Trustee and DIP Lender [Docket No. 756]
- d. Certificate of Service [Docket No. 765]
- e. Notice of Hearing [Docket No. 771]
- f. Certificate of Service [Docket No. 776]
- g. Notice of Filing [Docket No. 775]

- h. Certificate of Service [Docket No. 782]
- i. Certificate of Service [Docket No. 783]
- j. Notice of Filing Supplemental Documents in Support of the Debtors', Trustee and DIP Lender's Motion for an Order (I) Establishing Voting Record Date and Other Deadlines; (II) Authorizing Kurtzman Carson Consultants LLC to Act as the Singular Voting Agent with Respect to the Competing Plans; (III) Approving Solicitation and Notice Procedures with Respect to Competing Plans; (IV) Approving Manner and Forms of Ballots, Notices and Related Documents; and (V) Granting Related Relief [Docket No. 818]
- k. First Amended Plan of Reorganization of the Plan Sponsors Dated December 6, 2022 [Docket No. 869]
- l. First Amended Disclosure Statement for the Plan of Reorganization of the Plan Sponsors Dated December 6, 2022 [Docket No. 870]
- m. Notice of Filing Supplemental and Replacement Solicitation Procedures Order (including all exhibits) [Docket No. 874]
- n. Notice of Withdrawal of Documents related to Docket Nos. 775 and 818 [Docket No. 875]
- o. Certificate of Service [Docket No. 877]
- p. Amended Notice of Hearing [Docket No. 878]
- q. Second Amended Plan of Reorganization of the Plan Sponsors Dated December 12, 2022 [Docket No. 898]
- r. Second Amended Disclosure Statement for the Plan of Reorganization of the Plan Sponsors Dated December 12, 2022 [Docket No. 899]
- s. Certificate of Service [Docket No. 903]
- t. Notice of Filing Amended Proposed Order Granting Debtors' Trustee and DIP Lender's Motion for an Order (I) Establishing Voting Record Date and Other Deadlines; (II) Authorizing Kurtzman Carson Consultants LLC to Act as the Singular Voting Agent with Respect to the Competing

Plans; (III) Approving Solicitation and Notice Procedures with Respect to Competing Plans; (IV) Approving Manner and Forms of Ballots, Notices and Related Documents; and (V) Granting Related Relief [Docket No. 906]

Response(s): None.

CONTESTED MATTERS GOING FORWARD:

6. *Motion of the Trustee and DIP Lender for Entry of an Order Approving Disclosure Statement and Granting Related Relief* [Docket No. 754]

Response Date: November 28, 2022
Extended to December 12, 2022

Status: This matter is going forward.

Related Documents:

- a. Plan of Reorganization of the trustee ad DIP Lender Dated November 2, 2022 [Docket No. 752]
- b. Disclosure Statement for the Plan of Reorganization of the Trustee and DIP Lender Dated November 2, 2022 [Docket No. 753]
- c. Notice of Hearing to Consider Approval of (I) Disclosure Statement in Support of Joint Plan of Reorganization Proposed by the Committee and the Debtors and Related Solicitation Materials and Notices, (II) Disclosure Statement in Support of Plan of Reorganization Proposed by Trustee and DIP Lender and Related Solicitation Materials and Notices, and (III) Bidding Procedures, Stalking Horse Asset Purchase Agreement and Related Notices in Connection with the Plan Proposed by Trustee and DIP Lender [Docket No. 756]
- d. Certificate of Service [Docket No. 765]
- e. Certificate of Service [Docket No. 776]
- f. First Amended Disclosure Statement for the Plan of Reorganization of the Plan Sponsors Dated December 6, 2022 [Docket No. 870]
- g. First Amended Plan of Reorganization of the Plan Sponsors Dated December 6, 2022 [Docket No. 869]

- h. Notice of Hearing to Consider Approval of (I) First Amended Disclosure Statement for the Plan of Reorganization of the Plan Sponsors Dated December 6, 2022 and Related Solicitation Materials and Notices; and (II) Bidding Procedures, Stalking Horse Asset Purchase Agreement and Related Notices in Connection with the Plan [Docket No. 876]
- i. Certificate of Service [Docket No. 877]
- j. Second Amended Plan of Reorganization of the Plan Sponsors Dated December 12, 2022 [Docket No. 898]
- k. Second Amended Disclosure Statement for the Plan of Reorganization of the Plan Sponsors Dated December 12, 2022 [Docket No. 899]

Response(s):

- a. Bank of America, N.A.'s Objection to: (I) Debtors' Disclosure Statement Motion; and (II) Trustee's Disclosure Statement Motion [Docket No. 845]
- b. Brad B. Blumenthal's Objection to (I) Debtors' Disclosure Statement Motion; and (II) Trustee's Disclosure Statement Motion [Docket No. 853]
- c. Objection to the First Amended Disclosure Statement for the Plan of Reorganization of the Plan Sponsors Dated December 6, 2022 [Docket No. 889]
- d. Marlyn B. Calloway, Christopher C. Calloway, and R.W. Calloway, Jr.'s Objection to Confirmation of First Amended Disclosure Statement for the Plan of Reorganization of the Plan Sponsors Dated December 6, 2022 [Docket No. 891]
- e. David Stephen Donosky's Objection to Confirmation of First Amended Disclosure Statement for the Plan of Reorganization of the Plan Sponsors Dated December 6, 2022 [Docket No. 892]
- f. Former Residents' Objections to Approval of and Reservation of Rights Regarding the Disclosure Statement for the First Amended Joint Plan of Reorganization [Docket No. 893]

- g. Objection of Bonnielyn Francis to First Amended Disclosure Statement for the Plan of Reorganization of the Plan Sponsors Dated December 6, 2022 [Docket No. 894]
- h. Objection to First Amended Disclosure Statement for the Plan of Reorganization of the Plan Sponsors Dated December 6, 2022 [Docket No. 895]
- i. Ide Peebles Trotter, Jr., and the Estate of Luella Ruth Haupt Trotter's Joinder to the Former Residents' Objections [Docket No. 902]

7. *Motion of Debtors for Entry of an Order Extending the Debtors' Deadline to Assume or Reject Executory Contracts and Unexpired Leases* [Docket No. 773]

Response Date: December 2, 2022

Status: This matter is going forward.

Related Documents:

- a. Notice of Hearing [Docket No. 774]
- b. Certificate of Service [Docket No. 783]
- c. Certificate of Service [Docket No. 783]
- d. Certificate of Service [Docket No. 903]

Response(s):

- a. Intercity Investment Properties, Inc.'s Objection to Debtors' Motion for Entry of an Order Extending the Debtors' Deadline to Assume or Reject Executory Contracts and Unexpired Leases [Docket No. 864]
- b. Debtors' Reply to Intercity Investment Properties, Inc.'s Objection to Debtors' Motion for Entry of an Order Extending the Debtors' Deadline to Assume or Reject Executory Contracts and Unexpired Leases [Docket No. 873]

8. *Intercity Investment Properties, Inc.'s Motion Seeking an Order (I) Compelling Debtors to Comply with the Adequate Protection Order; (II) Compelling Debtors to Pay Real Estate Taxes; and (III) Granting Related Relief* [Docket No. 813]

Response Date: December 13, 2022

Status: This matter is going forward.

Related Documents:

- a. Notice of Hearing [Docket No. 774]

Response(s):

- a. Debtors' Objection to Investment Properties, Inc.'s Motion Seeking an Order (I) Compelling Debtors to Comply with the Adequate Protection Order; (II) Compelling Debtors to Pay Real Estate Taxes; and (III) Granting Related Relief [Docket No. 905]

9. *Intercity Investment Properties, Inc.'s Motion for Authority to Conduct Examinations Under Federal Rule of Bankruptcy Procedure 2004* [Docket No. 817]

Response Date: November 28, 2022
Extended to December 6, 2022

Status: This matter is going forward.

Related Documents:

- a. Notice of Status Conference [Docket No. 840]
- b. Certificate of Service [Docket No. 865]

Response(s):

- a. Debtors' Objection to Motion for Authority to Conduct Examinations Under Federal Rule of Bankruptcy Procedure 2004 [Docket No. 843]
- b. Bay 9 Holdings LLC's (I) Objection to Intercity Investment Properties, Inc.'s Motion for Authority to Conduct Examinations Under Federal Rule of Bankruptcy Procedure 2004; and (II) Joinder to Debtors' Objection to Intercity Investment Property, Inc.'s Motion for Expedited Hearing [Docket No. 831]
- c. Lifespace Communities, Inc.'s Joinder to Debtors' Objection to Intercity Investment Properties, Inc.'s Motion for Expedited Hearing on the Motion for Authority to Conduct Examination Under Federal Rule of Bankruptcy Procedure 2004 [Docket No. 829]

- d. Debtors' Objection to Intercity Investment Properties, Inc.'s Motion for Expedited Hearing on the Motion for Authority to Conduct Examinations Under Federal Rule of Bankruptcy Procedure 2004 [Docket No. 826]

ADVERSARY MATTERS GOING FORWARD (22-03040):

1. *Plaintiff's Motion to Compel Defendants to Respond to Discovery Requests* [Docket No. 98]

Response Date: N/A

Status: Continued from November 29, 2022 hearing. This matter is going forward as a Status Conference.

Related Documents:

- a. Notice of Hearing re: Plaintiff's Motion to Compel Defendants to Respond to Discovery Requests [Docket No. 104]
- b. Plaintiff's Witness and Exhibit List for Hearing on September 12, 2022, at 10:00 a.m. (CT) [Docket No. 122]
- c. Plaintiff's Witness and Exhibit List for Hearing on September 21, 2022, at 9:30 A.M. (CT) [Docket No. 154]

Response(s):

- a. Defendants' Response in Opposition to Plaintiff's Motion to Compel Defendants to Respond to Discovery Requests [Docket No. 119]

2. *Defendants' Motion to Compel Discovery Compliance from Plaintiff* [Docket No. 106]

Response Date: N/A

Status: Continued from November 29, 2022 hearing. This matter is going forward as a Status Conference.

Related Documents:

- a. Notice of Hybrid Hearing on Defendants' Motions to Compel Discovery [Docket No. 112]

Response(s):

- a. Plaintiff's Opposition to Defendants' Motion to Compel Production from Plaintiff [Docket No. 132]

3. *Defendants' Motion to Compel Discovery Compliance from UMB Bank, N.A.* [Docket No. 109]

Response Date: N/A

Status: Continued from November 29, 2022 hearing. This matter is going forward as a Status Conference.

Related Documents:

- a. Notice of Hearing re: Debtor's Unopposed Motion for Entry of an Amended Stipulated Protective Order [Docket No. 129]
- b. Opposition to Defendants' Motion to Compel UMB Bank, N.A.'s Compliance with Subpoena and Brief in Support [Docket No. 133]

Response(s): None.

4. *Motion to Modify Amended Scheduling Order* [Docket No. 137]

Response Date: N/A

Status: Continued from November 29, 2022 hearing. This matter is going forward as a Status Conference.

Related Documents:

- a. Notice of Hearing re: Motion to Modify Amended Scheduling Order [Docket No. 150]
- b. Plaintiff's Witness and Exhibit List for Hearing on September 12, 2022, at 10:00 a.m. (CT) [Docket No. 122]
- c. Plaintiff's Witness and Exhibit List for Hearing on September 21, 2022, at 9:30 A.M. (CT) [Docket No. 154]
- d. Second Amended Scheduling Order [Docket No. 187]
- e. Third Amended Scheduling Order [Docket No. 216]

Response(s):

- a. Defendants' Preliminary Statement Regarding Edgemere's Motion to Modify Scheduling Order [Docket No. 142]

5. *Plaintiff's Second Motion to Compel Defendants to Respond to Discovery Requests* [Docket No. 224]

Response Date: N/A

Status: This matter is going forward.

Related Documents:

- a. Notice of Hearing re: Plaintiff's Second Motion to Compel Defendants to Respond to Discovery Requests [Docket No. 225]

Response(s):

- a. Defendants' Response in Opposition to Plaintiff's Second Motion to Compel Defendants to Respond to Discovery Requests [Docket No. 247]
- b. Brief in Support of Defendants' Response in Opposition to Plaintiff's Second Motion to Compel [Docket No. 248]
- c. Appendix in Support of Defendants' Response in Opposition to Plaintiff's Second Motion to Compel [Docket No. 249]

6. *Defendants' Motion to Compel Plaintiff's Production of Documents* [Docket No. 226]

Response Date: N/A

Status: This matter is going forward.

Related Documents:

- a. Notice of Hearing [Docket No. 235]

Response(s):

- a. Plaintiff's Response to Defendants' Motion to Compel Production from Plaintiff [Docket No. 250]

7. *Defendants' Motion for Entry of a Second Amended Stipulated Protective Order, Unopposed by Debtor* [Docket No. 244]

Response Date: N/A

Status: This matter is going forward.

Related Documents:

- a. Defendants' Motion for Expedited Hearing on Motion for Entry of a Second Amended Stipulated Protective Order, Unopposed by Debtor [Docket No. 245]
- b. Notice of Hearing on Defendants' Motion for Entry of a Second Amended Stipulated Protective Order, Unopposed by Debtor [Docket No. 246]

Response(s):

None.

Dated: December 14, 2022
Dallas, Texas

POLSINELLI PC

/s/ Trinitee G. Green

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