

Susan N. Goodman  
Texas Bar No. 24117585  
PIVOT HEALTH LAW, LLC  
P.O. Box 69734 | Oro Valley, Arizona 85737  
sgoodman@pivotohealthaz.com  
message: (520) 744-7061  
*Patient Care Ombudsman*

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

**IN RE:**

**NORTHWEST SENIOR HOUSING  
CORPORATION, *et al.*,<sup>1</sup>**

**Debtors.**

§  
§ **CHAPTER 11**  
§  
§ **CASE NO: 22-30659 (MVL)**  
§  
§ **(Jointly Administered)**  
§  
§

**PATIENT CARE OMBUDSMAN THIRD INTERIM  
FEE APPLICATION COVER SHEET**

Applicant/Capacity:	Susan N. Goodman/ Patient Care Ombudsman
Time Period:	November 1, 2022, through February 28, 2023
Bankruptcy Petition Date:	April 14, 2022
Date PCO Appointment:	April 28, 2022
Amount Accrued:	\$17,771.22 (\$16,313.50 fees; \$1,457.72 expenses)
Amount Requested:	\$17,771.22
Amount Previously Paid:	\$36,144.17
Amount in Trust:	\$0.00
Amount Unpaid and Requested:	Sixth Monthly Fee Application (Seventh Monthly pending)
Expense Detail:	\$1,055.95 Airfare; \$194.80 Hotel; \$22.40 Meals; \$111.45 Car Rental; \$50.00 Parking; \$23.12 Postage
Retainer:	None
Hourly Rates:	\$395.00
Hours This Application:	41.3
Activity Classification:	General Case Administration 29.6 hours; Travel 4.5; and 7.2 Fees (preparation of this application not included)
Accomplishments:	continued remote monitoring/engagement; hearing attendance; one site visit; two reports; three monthly/one interim fee apps; docket monitoring and pleading review

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



2230659230301000000000003

Susan N. Goodman  
Texas Bar No. 24117585  
PIVOT HEALTH LAW, LLC  
P.O. Box 69734  
Oro Valley, Arizona 85737  
sgoodman@pivotohealthaz.com  
message: (520) 744-7061  
*Patient Care Ombudsman*

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

IN RE:

**NORTHWEST SENIOR HOUSING  
CORPORATION, *et al.*,<sup>2</sup>**

**Debtors.**

§  
§  
§  
§  
§  
§  
§

**CHAPTER 11**

**CASE NO: 22-30659 (MVL)**

**(Jointly Administered)**

---

**THIRD INTERIM FEE APPLICATION OF SUSAN N. GOODMAN FOR  
COMPENSATION AND REIMBURSEMENT OF EXPENSES AS PATIENT CARE  
OMBUDSMAN FOR PERIOD NOVEMBER 1, 2022, THROUGH FEBRUARY 28, 2023**

**NO HEARING WILL BE CONDUCTED HEREON UNLESS A WRITTEN RESPONSE IS FILED WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT AT: EARLE CABELL FEDERAL BUILDING, 1100 COMMERCE STREET, ROOM 1254, DALLAS, TX 75242-1496 BEFORE CLOSE OF BUSINESS MARCH 22, 2023 WHICH IS AT LEAST 21 DAYS FROM THE DATE OF SERVICE HEREOF.**

**ANY RESPONSE SHALL BE IN WRITING AND FILED WITH THE CLERK, AND A COPY SHALL BE SERVED UPON COUNSEL FOR THE MOVING PARTY PRIOR TO THE DATE AND TIME SET FORTH HEREIN. IF A RESPONSE IS FILED A HEARING MAY BE HELD WITH NOTICE ONLY TO THE OBJECTING PARTY.**

**IF NO HEARING ON SUCH NOTICE OR MOTION IS TIMELY REQUESTED, THE RELIEF REQUESTED SHALL BE DEEMED TO BE UNOPPOSED, AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT OR THE NOTICED ACTION MAY BE TAKEN.**

---

<sup>2</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 (2669). The Debtors' mailing address is: 8523 Thackery Street, Dallas, Texas 75225.

TO THE HONORABLE MICHELLE V. LARSON, UNITED STATES BANKRUPTCY  
JUDGE:

SUSAN N. GOODMAN, as the Patient Care Ombudsman (the “PCO” or “Applicant”), in the above-captioned cases (the “Chapter 11 Cases”) submits this third interim fee application (the “Application”) for approval of compensation and reimbursement of expenses for the period from November 1, 2022, through and including February 28, 2023 (the “Application Period”), pursuant to Sections 330 and 331 of Title 11 of the United States Code (the “Bankruptcy Code”). In support of the Application, PCO represents as follows:

### **JURISDICTION AND VENUE**

1. This Court has jurisdiction of this Chapter 11 proceeding pursuant to 28 U.S.C. §§ 157 and 1334. This matter constitutes a core proceeding pursuant to 28 U.S.C. § 157(b)(2).
2. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.
3. The statutory and other predicates for the relief requested herein are Bankruptcy Code sections 105(a), 330, and 331; Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”); Rule 2016-1 of the Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas, including Appendix F therein (the “Local Rules”); and the court’s June 13, 2022, *Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses and Professionals* (the “Interim Compensation Order”) [Docket No. 401] entered in these Chapter 11 cases.

### **BACKGROUND**

4. On April 14, 2022 (the “Petition Date”), each of the Debtors filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Northern District of Texas, Dallas Division (the “Court”). The cases were jointly administered under Case No. 22-30659.
5. The Debtors continue to operate and manage their businesses as debtors in possession pursuant to Bankruptcy Code sections 1107(a) and 1108. No trustee or examiner has been appointed.

6. On April 26, 2022, the Court entered its *Order Directing the Appointment of a Patient Care Ombudsman* (the “**PCO Order**”) at Docket No. 128.

7. In response, on April 28, 2022, the United States Trustee’s Office filed its *Notice of Appointment of Patient Care Ombudsman Under 11 U.S.C. § 333* (the “**Appointment Notice**”), indicating the appointment of the Applicant to serve as the PCO [Docket No. 137].

### **SUMMARY OF SERVICES PROVIDED**

8. After the Appointment Notice, Debtors counsel facilitated PCO’s introduction to Debtor operational leadership at the Plaza at Edgemere, the focus of PCO’s appointment.

9. PCO has performed four site visits and filed five reports thus far in the case: *Patient Care Ombudsman’s First Interim Report – The Plaza Locations at Edgemere* (the “**First Report**”) at Docket No. 364 on June 2, 2022; *Patient Care Ombudsman’s Second Interim Report – The Plaza Locations at Edgemere* (the “**Second Report**”) at Docket No. 504 on August 2, 2022; *Patient Care Ombudsman’s Third Interim Report – The Plaza Locations at Edgemere* (the “**Third Report**”) at Docket No. 681 on October 3, 2022; *Patient Care Ombudsman’s Fourth Interim Report – The Plaza Locations at Edgemere* (the “**Fourth Report**”) at Docket No. 867 on December 4, 2022; and, *Patient Care Ombudsman’s Fifth Interim Report – The Plaza Locations at Edgemere* (the “**Fifth Report**”) at Docket No. 1162 on February 7, 2023.

10. In addition to conducting site visits and authoring reports, PCO has remained regularly engaged with operational leadership during the Application Period, including remotely monitoring resident quality data. Further, PCO has monitored the case docket and attended hearings at a level of engagement consistent with the PCO case role.

11. PCO spent a total of 41.3 hours engaged in the PCO role during the Application Period. More than 71% of PCO’s professional time, 29.6 hours were classified under general case administration. Half rate non-working travel hours totaled 4.5 hours (noting that PCO only charged for direct transit hours). Time spent associated with fee activities totaled 7.2 hours, with this total not inclusive of preparation of this Application or the Seventh Monthly Application. This time will be included in PCO’s subsequent application.

12. The total sum due to PCO for professional services rendered on behalf of Debtors patients/residents is \$16,313.50 in fees and \$1,457.72 in actual, necessary expenses. Expenses, by category were:

Expense Category	Total
Airfare	\$1,055.95
Car Rental	\$111.45
Hotel	\$194.80
Meals	\$22.40
Parking Fees/Tolls	\$50.00
Postage	\$23.12
<b>Total</b>	<b>\$1,457.72</b>

13. In support of this Application, PCO submits a fee summary and detailed invoices attached herein as **Exhibits B and C**. A proposed order is attached herein as **Exhibit D**.

#### **EVALUATION STANDARDS**

14. United States Bankruptcy Code § 330(a)(3)-(4)(A) provides an analytical framework to evaluate the reasonableness of professional fees and expenses. The court considers the nature, extent, and value of the services rendered relative to: (1) the time spent, (2) the rates charged, (3) whether the services were necessary or provided a benefit to the estate, (4) the time spent relative to the complexity and nature of the task addressed, (5) whether the professional demonstrated skill and expertise, (6) whether the professional fee is comparatively reasonable, and (7) whether the fee avoids unnecessary duplication and/or waste. If the professional fee requested fails this analysis, the court may reduce the amount of compensation awarded.

15. The Fifth Circuit has historically adopted a “lodestar” method for determining the reasonableness of compensation under Bankruptcy Code §330. See *In re Lawler*, 807 F.2d 1207, 1211 (5th Cir. 1987) (the primary method used to determine a reasonable fee in bankruptcy is “equal

to the number of hours reasonably expended multiplied by the prevailing hourly rate in the community for similar work”).

16. This Application seeks payment for 41.3 hours of PCO time. More than 71% percent of PCO’s billed time was for activities that classify as general case administration under Section I (C) of the *Guidelines for Compensation and Reimbursement of Professionals in Chapter 11 Cases* for the United States Bankruptcy Court Northern District of Texas, Effective January 1, 2001. Billed ½ rate non-working travel time totaled 4.5 hours, with only direct, in-transit travel hours between PCO’s office and the Edgemere location billed, thereby reducing PCO’s total accumulated travel time. A total of 7.2 hours of time were spent in activities associated with fee document preparation, with the caveat that professional fee accumulation and associated postal expenses for this Application and the Seventh Monthly application will be included with later application requests.

17. PCO’s engagement provided vital and necessary service to residents and patients cared for by Debtors during the Application Period. PCO reduced costs to the Debtors by visiting the location contemporaneous with other travel into the area, reducing the burden of the cost of the PCO role on the Debtors organizations.

18. The \$395.00 hourly rate charged by PCO compares favorably to hourly rates charged by other professionals in this field and is consistent with PCO’s health law practice fees. PCO has a clinical, health care operations, and health law compliance background that allowed for thorough PCO coverage without engagement of other professionals.

19. PCO has not shared or agreed to share compensation or reimbursement awarded in this case with any other person or entity. No agreement or understanding exists between Applicant and any other person for a division of compensation. Applicant has not entered into any agreement prohibited by U.S.C. Title 18 §155.

### **RELIEF REQUESTED**

**WHEREFORE**, PCO requests this court enter an order substantially in the form attached herein as Exhibit D:

- a. approving fees, on an interim basis, for the allowance of \$16,313.50 as reasonable compensation for actual and necessary professional services rendered by the PCO for the benefit of Debtors residents/patients during the Application Period;
- b. approving expenses, on an interim basis, for the reimbursement of actual and necessary out-of-pocket expenses in the amount of \$1,457.72 incurred by the PCO in the performance of required professional services during the Application Period;
- c. authorizing the Debtors to pay the PCO for approved fees and expenses in the aggregate amount of **\$17,771.22** (the “Award”);
- d. directing the Debtors to pay Applicant any yet unpaid fees and expenses through PIVOT HEALTH LAW, LLC; and,
- e. granting such other and further relief as the court deems just and proper.

DATED: March 1, 2023.

By: /s/Susan N. Goodman, RN JD (TX Bar 24117585)

PIVOT HEALTH LAW, LLC

P.O. Box 69734

Oro Valley, Arizona 85737

Ph: (520) 744-7061 | Fx: (520) 575-4075

[sgoodman@pivthealthaz.com](mailto:sgoodman@pivthealthaz.com)

Patient Care Ombudsman

### STATEMENT OF CERTIFYING PROFESSIONAL

The undersigned hereby certifies that she prepared and read the foregoing *Third Interim Fee Application of Susan N. Goodman for Compensation and Reimbursement of Expenses as Patient Care Ombudsman for Period November 1, 2022, through February 28, 2023*, and to the best of her knowledge, information and belief, formed after reasonable inquiry, the compensation and expense reimbursement requested (a) are in conformity with the Court’s *Guidelines for Compensation and Reimbursement of Professionals in Chapter 11 Cases*, effective January 1, 2001, (b) are permissible under the relevant rules, court orders, and Bankruptcy Code provisions, (c) were billed at rates in accordance with practices, no less favorable than those customarily employed by the Applicant, and generally accepted by the Applicant’s clients, and, (d) are *without* any agreement or understanding between Applicant and any other person for a division of compensation or any agreement prohibited by U.S.C. Title 18 § 155.

DATED: March 1, 2023.

By: /s/Susan N. Goodman, RN JD (TX Bar 24117585)

Susan N. Goodman

Patient Care Ombudsman

**EXHIBIT A**  
**Certificate of Service**

I hereby certify that a true and correct copy of the foregoing pleading was served upon the parties via the Court's electronic transmission facilities, on this 1<sup>st</sup> day of March 2023, with a copy sent by regular mail on March 1, 2023, to the Notice Parties, and a copy provided by email to those parties in interest as identified in the *Motion of Debtors for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals* (the “**Interim Compensation Motion**”) [Docket No. 111] as detailed below.

/s/ Susan N. Goodman, RN JD (TX Bar 24117585

**Notice Parties**

<b>Northwest Senior Housing Corp.</b> Attn: Nick Harshfield 8523 Thackery Street Dallas, Texas 75225 <i>Debtors</i>	<b>Polsinelli PC</b> Attn: Trinitee G. Green 2950 N Harwood, Ste 2100 Dallas, TX 75201 <i>Debtors counsel</i>
<b>Polsinelli PC</b> Attn: Jeremy R. Johnson, Brenna Dolphin 600 3 <sup>rd</sup> Ave, 42 <sup>nd</sup> Floor New York, NY 10016 <i>Attorneys for Debtors</i>	<b>Mintz Levin</b> Attn: Daniel S. Bleck One Financial Center Boston, MA 02111 <i>Attorneys for UMB Bank N.A, as Trustee</i>
<b>Foley &amp; Lardner LLP</b> Attn: Thomas C Scannell, Stephen A. McCartin 2021 McKinney Avenue Suite 1600 Dallas, Texas 75201 <i>Attorneys for Unsecured Creditor Committee</i>	<b>Office of the United States Trustee</b> Attn: Lisa Lambert Earle Cabell Federal Building 1100 Commerce Street, Room 976 Dallas, TX 75242 <i>Attorneys for the Office of the United States Trustee's Office</i>
<b>Jackson Walker</b> Attn: Michael S. Held, Machir Stull, & Jennifer Wertz 2323 Ross Avenue, Suite 600 Dallas, Texas 75201 <i>Attorneys for Intercity Investment Properties, Inc.</i>	<b>Levenfeld &amp; Pearlstein, LLC</b> Attn: Harold Israel, Eileen M. Sethna, & Elizabeth B. Vandesteeg 2 N. LaSalle St, Ste 1300 Chicago, IL 60602 <i>Attorneys for Creditor Intercity Investment Properties, Inc.</i>



### Parties in Interest

<b>Polsinelli PC</b> Trinitee G. Green Liz Boydston Jeremy R. Johnson (NYC office) Ashley Champion (ATL Office) 2950 N. Harwood, Ste 2100 Dallas, TX 75201 <a href="mailto:tggreen@polsinelli.com">tggreen@polsinelli.com</a> <a href="mailto:lboydston@polsinelli.com">lboydston@polsinelli.com</a> <a href="mailto:jeremy.johnson@polsinelli.com">jeremy.johnson@polsinelli.com</a> <a href="mailto:achampion@polsinelli.com">achampion@polsinelli.com</a> <i>Attorneys for Debtor</i>	<b>Office of the United States Trustee</b> Lisa Lambert 1100 Commerce Street, Room 976 Dallas, TX 75242 <a href="mailto:lisa.l.lambert@usdoj.gov">lisa.l.lambert@usdoj.gov</a> <i>Attorneys for the Office of the United States Trustee's Office</i>
<b>Forshey &amp; Prostok, LLP</b> Bobby Forshey Suzanne K. Rosen 777 Main Street, Suite 1550 Ft. Worth, TX 76102 <a href="mailto:bforshey@forsheyprostok.com">bforshey@forsheyprostok.com</a> <a href="mailto:srosen@forsheyprostok.com">srosen@forsheyprostok.com</a> <i>Attorneys for Interested Party Tarrant County Senior Living Ctr. d/b/a The Stayton at Museum Way</i>	<b>Texas Health and Human Svcs Commission</b> Bankruptcy & Collections Division Jason Binford Abigail R. Ryan P.O. Box 12548 Austin, TX 78711 <a href="mailto:jason.binford@oag.texas.gov">jason.binford@oag.texas.gov</a> <a href="mailto:abigail.ryan@oag.texas.gov">abigail.ryan@oag.texas.gov</a> <i>Attorneys for interested party Texas HHS Commission</i>
<b>Mintz Levin</b> Daniel S. Bleck Eric Blythe Caitlin A. Hill Emily K. Musgrave One Financial Center Boston, MA 02111 <a href="mailto:dbleck@mintz.com">dbleck@mintz.com</a> <a href="mailto:eblythe@mintz.com">eblythe@mintz.com</a> <a href="mailto:cahill@mintz.com">cahill@mintz.com</a> <a href="mailto:ekmusgrave@mintz.com">ekmusgrave@mintz.com</a> <i>Attorneys for UMB Bank, NA (DIP Lender and Bond Trustee)</i>	<b>Jackson Walker</b> Michael S. Held Machir Stull Jennifer Wertz 2323 Ross Avenue, Suite 600 Dallas, Texas 75201 <a href="mailto:mheld@jw.com">mheld@jw.com</a> <a href="mailto:mstull@jw.com">mstull@jw.com</a> <a href="mailto:jwertz@jw.com">jwertz@jw.com</a> <i>Local Attorneys for Intercity Investment Properties, Inc.</i>
<b>Scheef &amp; Stone LLP</b> Peter Lewis 500 North Akard Street, Suite 2700 Dallas, TX 75201 <a href="mailto:peter.lewis@solidcounsel.com">peter.lewis@solidcounsel.com</a> <i>Attorneys for Creditor Julia J. Peavy</i>	<b>Haynes Boone</b> James "Frasher" Murphy 2323 Victory Avenue Suite 700 Dallas, TX 75219 <a href="mailto:frasher.murphy@haynesboone.com">frasher.murphy@haynesboone.com</a> <i>Attorneys for UMB Bank, NA</i>
<b>Buchalter Law Firm</b> Jeffrey K. Garfinkle 18400 Von Karman Avenue, Suite 800 Irvine, California 92612-0514 <a href="mailto:jgarfinkle@buchalter.com">jgarfinkle@buchalter.com</a> <i>Attorneys for Creditor McKesson Corp.</i>	<b>Foley &amp; Lardner LLP</b> Thomas C Scannell Stephen A. McCartin Mark C. Moore 2021 McKinney Avenue Suite 1600 Dallas, Texas 75201 <a href="mailto:tscannell@foley.com">tscannell@foley.com</a> <a href="mailto:smccartin@foley.com">smccartin@foley.com</a> <a href="mailto:mmoore@foley.com">mmoore@foley.com</a> <i>Attorneys for Unsecured Creditor Committee</i>

<b>Ferguson Braswell Fraser Kubasta PC</b> Rachel L. Smiley 2500 Dallas Parkway, Suite 600 Plano, TX 75093 <a href="mailto:rsmiley@fbfk.law">rsmiley@fbfk.law</a> <i>Attorneys for Creditor Phillimore Family Holdings, LP and Richard M. and Jean Huff; Executor Clay Estes</i>	<b>Spector &amp; Cox PLLC</b> Howard Marc Spector 12770 Coit Road, Ste 850 Dallas, TX 75251 <a href="mailto:hspector@spectorcox.com">hspector@spectorcox.com</a> <i>Attorneys for Creditors Allan Metz; Gloria M. Simon; VD Management Trust; Hollander Estate</i>
<b>Linebarger Goggan Blair &amp; Sampson LLP</b> Laurie A. Spindler John Kendrick Turner 2777 N Stemmons Fwy, Ste 1000 Dallas, TX 75207 <a href="mailto:dallas.bankruptcy@lgbs.com">dallas.bankruptcy@lgbs.com</a> <a href="mailto:laurie.spindler@lgbs.com">laurie.spindler@lgbs.com</a> <a href="mailto:john.turner@lgbs.com">john.turner@lgbs.com</a> <i>Attorneys for Creditor Dallas County</i>	<b>K &amp; L Gates</b> David Weitman 1717 Main Street, Ste 2800 Dallas, TX 75201 <a href="mailto:david.weitman@klgates.com">david.weitman@klgates.com</a> <i>Attorneys for Creditor Estate of Pauline Carp</i>
<b>Benton Williams PLLC</b> Benton Williams II 100 Crescent Ct, Ste 700 Dallas, TX 75201 <a href="mailto:BW@bentonwilliamspllc.com">BW@bentonwilliamspllc.com</a> <i>Attorneys for Creditors Andrew Adams, Pamela Singlia</i>	<b>Brown Fox PLLC</b> Eric Charles Wood 6303 Cowboys Way, Ste 450 Frisco, TX 75034 <a href="mailto:eric@brownfoxlaw.com">eric@brownfoxlaw.com</a> <i>Attorneys for Creditor TechScape, Inc.</i>
<b>Polsinelli PC</b> Brenna A. Dolphin Marc B. Joachim 1401 Eye Street NW, Ste 800 Washington, DC 20005 <a href="mailto:bdolphin@polsinelli.com">bdolphin@polsinelli.com</a> <a href="mailto:mjoachim@polsinelli.com">mjoachim@polsinelli.com</a> <i>Attorneys for LA Party Senior Quality Lifestyles Corp.</i>	<b>Kurtzman Carson Consultants LLC</b> Drake Foster 222 N. Pacific Coast Highway, Ste. 300 El Segundo, CA 90245 <a href="mailto:dfoster@kccllc.com">dfoster@kccllc.com</a> <i>Noticing Agent</i>
<b>Levenfeld &amp; Pearlstein, LLC</b> Harold Israel Eileen M. Sethna Elizabeth B. Vandesteeg Gary Blackman Christina Lutz 2 N. LaSalle St, Ste 1300 Chicago, IL 60602 <a href="mailto:hisrael@lplegal.com">hisrael@lplegal.com</a> <a href="mailto:esethna@lplegal.com">esethna@lplegal.com</a> <a href="mailto:evandesteeg@lplegal.com">evandesteeg@lplegal.com</a> <a href="mailto:gblackman@lplegal.com">gblackman@lplegal.com</a> <a href="mailto:celutz@lplegal.com">celutz@lplegal.com</a> <i>Attorneys for Creditor Intercity Investment Properties, Inc.</i>	<b>Donald R Trice</b> 48 Kasten Run Dahlonega, GA 30533 <a href="mailto:dontrice39@gmail.com">dontrice39@gmail.com</a> <i>Unsecured Creditor Committee Member</i>
<b>James Eckelberger</b> 8523 Thackery Street #9112 Dallas, TX 75225 <a href="mailto:jimeckelberger@outlook.com">jimeckelberger@outlook.com</a> <i>Unsecured Creditor Committee Member</i>	<b>James A. Smith</b> 8523 Thackery Street, #9116 Dallas, TX 75225 <a href="mailto:jamesas1023@mac.com">jamesas1023@mac.com</a> <i>Unsecured Creditor Committee Member</i>
<b>Erle A. Nye</b> 8523 Thackery Street #9114 Dallas, TX 75225 <a href="mailto:erlenye@txu.com">erlenye@txu.com</a> <i>Unsecured Creditor Committee Member</i>	<b>Pamela Siviglia</b> Estate of Patricia Adams 5226 Isleworth Country Club Dr Windemere, FL 34686 <a href="mailto:pamsiviglia@gmail.com">pamsiviglia@gmail.com</a> <i>Unsecured Creditor Committee Member</i>

<b>Jane Sommerhalder Wilson</b> Trustee for the Joy A. Sommerhalder Trust 6935 Oak Manor Drive Dallas, TX 75230 <a href="mailto:janddwilson@charter.net">janddwilson@charter.net</a> <i>Unsecured Creditor Committee Member</i>	<b>Steve Helbing</b> Independent Executor to the Estate of Ellen S. Helbing 6498 Farthing Drive Colorado Springs, CO 80906 <a href="mailto:stevehelbing@comcast.net">stevehelbing@comcast.net</a> <i>Unsecured Creditor Committee Member</i>
<b>Carrington Coleman Sloman &amp; Blumenthal LLP</b> J. Michael Sutherland 901 Main Street, Ste 5500 Dallas, TX 75202 <a href="mailto:msutherland@ccsb.com">msutherland@ccsb.com</a> <i>Attorneys for Executor Blumenthal Estate</i>	<b>Brousseau Naftis &amp; Massingill, PC</b> Cynthia G. Dooley 300 Knox Place 4645 N Central Expressway Dallas, TX 75205 <a href="mailto:cynthia@bnmdallas.com">cynthia@bnmdallas.com</a> <i>Attorneys for Trubitt Trustee</i>
<b>Kemp Smith LLP</b> James W. Brewer P.O. Drawer 2800 El Paso, TX 79999 <a href="mailto:jbrewer@kempsmith.com">jbrewer@kempsmith.com</a> <i>Attorneys for Creditor Bonnielyn Francis</i>	<b>Cinclair Law, PLLC</b> Richard J. Sinclair, Jr. Esq. 2221 Stanmore Lane Plano, Texas 75025 <a href="mailto:rick@cinclaw.com">rick@cinclaw.com</a> <i>Attorneys for Estate of Sudbrink</i>
<b>Cowles &amp; Thompson PC</b> William L. Siegel 901 Main Street, Suite 3900 Dallas, TX 75202 <a href="mailto:bsiegel@cowlesthompson.com">bsiegel@cowlesthompson.com</a> <i>Attorneys for Joel E. Brickell</i>	<b>Waddell Serafino Geary Rechner Jenevein PC</b> Beverly Cahill Rice 1717 Main Street, Ste 2500 Dallas, TX 75201 <a href="mailto:bcahill@wslawpc.com">bcahill@wslawpc.com</a> <i>Attorneys for Co-Trustees to Cerny Trust</i>
<b>Kean Miller LLP</b> Lloyd A. Lim Rachel T. Kubanda 711 Louisiana Street, Ste 1800 Houston, TX 77002 <a href="mailto:lloyd.lim@keanmiller.com">lloyd.lim@keanmiller.com</a> <a href="mailto:rachel.kubanda@keanmiller.com">rachel.kubanda@keanmiller.com</a> <i>Attorneys for Bank of America NA as Trustee to Gantt Estate</i>	<b>Haley &amp; Olson PC</b> Blake Rasner 100 N. Ritchie Road, Ste 200 Waco, Texas 76712 <a href="mailto:brasner@haleyolson.com">brasner@haleyolson.com</a> <i>Attorneys for Bancorpsouth Bank, A Division of Cadence Bank</i>
<b>Dkyema Gossett PLLC</b> Jeffrey R. Fine Alexandria Rahn 1717 Main Street, Ste 4200 Dallas, TX 75201 <a href="mailto:jfine@dykema.com">jfine@dykema.com</a> <a href="mailto:arahn@dykema.com">arahn@dykema.com</a> <i>Attorneys for Creditor and Party-In-Interest Howard Schultz</i>	<b>Sheils Winnubst, PC</b> Mark D. Winnubst 1701 N. Collins Blvd, Ste 1100 Richardson, TX 75080 <a href="mailto:mark@sheilswinnubst.com">mark@sheilswinnubst.com</a> <i>Attorneys for Lynda Legge Trust UW Jeanne Marie Lancaster Cunningham</i>
<b>The Wortham Law Firm</b> Michael P. Wortham, Esq. 12001 N. Central Expressway Ste 650 Dallas, TX 75243 <a href="mailto:mike@worthamlaw.com">mike@worthamlaw.com</a> <i>Attorneys for Martha Box</i>	<b>Quilling Selander Lownds Winslett &amp; Moser PC</b> Christopher J. Moser 2001 Bryan Street, Ste 1800 Dallas, TX 75201 <a href="mailto:cmoser@qslwm.com">cmoser@qslwm.com</a> <i>Attorneys for creditor and party-in-interest Robert C. Pearson</i>
<b>Abernathy Roeder Boyd &amp; Hullett PC</b> Paul M. Lopez Larry R. Boyd 1700 Redbud Blvd, Ste 300 McKinney, TX 75069 <a href="mailto:plopez@abernathy-law.com">plopez@abernathy-law.com</a> <a href="mailto:lboyd@abernathy-law.com">lboyd@abernathy-law.com</a> <i>Attorneys for Marjorie Jones</i>	<b>Naman Howell Smith &amp; Lee PLLC</b> Kerry L. Haliburton PO Box 1470 Waco, TX 76703 <a href="mailto:haliburton@namanhowell.com">haliburton@namanhowell.com</a> <i>Attorneys for Estate of Carol Randolph Crosthwait</i>

<p><b>Law Office of Claire Collins</b>  Claire Collins  PO Box 800873  Dallas, TX 75380  <a href="mailto:claire.schwarz@sbcglobal.net">claire.schwarz@sbcglobal.net</a>  <i>Attorneys for Dallas Foundation, Assignee of Estate</i></p>	<p><b>Byman &amp; Associates PLLC</b>  C. Alexander Higginbotham  7924 Broadway, Ste 104  Pearland, TX 77581  <a href="mailto:cah@bymanlaw.com">cah@bymanlaw.com</a>  <i>Attorneys for David and Tucean Webb</i></p>
<p><b>Chamberlain Hrdlicka White Williams &amp; Aughtry</b>  Jarrod B. Martin  1200 Smith Street, Ste 1400  Houston, TX 77002  <a href="mailto:jarrod.martin@chamberlainlaw.com">jarrod.martin@chamberlainlaw.com</a>  <i>Attorneys for representative of Ide Peebles Trotter, Jr. and Estate of Luella Ruth Haupt Trotter</i></p>	<p><b>Cherry Petersen Landry Albert LLP</b>  Craig A. Albert  8350 N Central Expressway, Ste 1500  Dallas, TX 75206  <a href="mailto:calbert@cplalaw.com">calbert@cplalaw.com</a>  <i>Attorneys for creditors and parties in interest M.B., C.C. and R.W. Jr. Calloway</i></p>
<p><b>O'Melveny &amp; Myers LLP</b>  Louis R. Strubeck Jr.  Gregory M. Wilkes  Laura L. Smith  2501 N. Harwood Street, Ste 1700  Dallas, TX 75201  <a href="mailto:lstrubeck@omm.com">lstrubeck@omm.com</a>  <a href="mailto:gwilkes@omm.com">gwilkes@omm.com</a>  <a href="mailto:lsmith@omm.com">lsmith@omm.com</a>  <i>Attorneys for Ankura Consulting Group LLC</i></p>	<p><b>Carrington Coleman Soman &amp; Blumenthal LLP</b>  Jason M. Katz  901 Main Street, Ste 5500  Dallas, TX 75202  <a href="mailto:jkat@ccsb.com">jkat@ccsb.com</a>  <i>Attorneys for Virginia Walton</i></p>
<p><b>SettlePou</b>  Will G. Bassham  Michael P. Menton  Charles R. Curran  3333 Lee Parkway, Eighth Floor  Dallas, Texas 75219  <a href="mailto:wbassham@settlepou.com">wbassham@settlepou.com</a>  <a href="mailto:mmenton@settlepou.com">mmenton@settlepou.com</a>  <a href="mailto:ccurran@settlepou.com">ccurran@settlepou.com</a>  <i>Attorneys for Marilyn Jefferson</i></p>	<p><b>Perkins Coie LLP</b>  John D. Penn  500 N. Akard Street, Suite 3300  Dallas, Texas 75201  <a href="mailto:jpenn@perkinscoie.com">jpenn@perkinscoie.com</a>  <i>Attorneys for Lifespace Communities, Inc.</i></p>
<p><b>Perkins Coie LLP</b>  Kathleen Allare  110 N. Wacker Drive, Ste 3400  Chicago, IL 60606  <a href="mailto:kallare@perkinscoie.com">kallare@perkinscoie.com</a>  <i>Attorneys for Lifespace Communities, Inc.</i></p>	<p><b>PMM LAW</b>  Luke Madole  901 Main Street, Ste 5500  Dallas, TX 75202  <a href="mailto:lmadole@pmmlaw.com">lmadole@pmmlaw.com</a>  <i>Attorneys for Creditor Robert B. Payne, Jr., Co-Executor</i></p>
<p><b>Mintz Levin</b>  Kaitlin R. Walsh  666 Third Ave.  New York, NY 10017  <a href="mailto:KRWalsh@mintz.com">KRWalsh@mintz.com</a>  <i>Attorneys for UMB Bank, NA</i></p>	<p><b>Cooley LLP</b>  Eric Walker  110 N. Wacker Drive, Ste 4200  Chicago, IL 60606  <a href="mailto:ewalker@cooley.com">ewalker@cooley.com</a>  <i>Attorneys for Lifespace Communities, Inc.</i></p>
<p><b>Locke Lord LLP</b>  Adrienne K. Walker  Chelsey Rosenbloom List  111 Huntington Ave.  Boston, MA 02199  <a href="mailto:awalker@lockelord.com">awalker@lockelord.com</a>  <a href="mailto:chelsey.list@lockelord.com">chelsey.list@lockelord.com</a>  <i>Attorneys for Bay 9 Holdings LLC</i></p>	<p><b>Cavazos Hendricks Poirot PC</b>  Emily S. Wall  Charles B. Hendricks  900 Jackson Street, Ste 570 (Founders Square)  Dallas, TX 75202  <a href="mailto:ewall@chfirm.com">ewall@chfirm.com</a>  <a href="mailto:chuckh@chfirm.com">chuckh@chfirm.com</a>  <i>Attorneys to Creditor David Stephen Donosky</i></p>

<b>Allen Matkins Leck Gamble Mallory &amp; Natsis LLP</b> Ivan M. Gold Three Embarcadero Center, 12 <sup>th</sup> Fl San Francisco, CA 94111 <a href="mailto:igold@allenmatkins.com">igold@allenmatkins.com</a> <i>Attorneys for Intercity Investment Properties, Inc.</i>	<b>Nixon Peabody LLP</b> Christopher Fong Victor Milione (Boston Office) 55 W 46 <sup>th</sup> St New York, NY 10036 <a href="mailto:cfong@nixonpeabody.com">cfong@nixonpeabody.com</a> <a href="mailto:vmilione@nixonpeabody.com">vmilione@nixonpeabody.com</a> <i>Attorneys for Long Hill at Edgemere LLC</i>
---	--

/s/ Susan N. Goodman, RN JD (TX Bar 24117585



**EXHIBIT B**  
*Fee Statement Summary*

**Case Name: Northwest Sr Housing Corp, d/b/a Edgemere**

**Case No: ND TX DAL 22-30659**

**11/01/22 to 02/28/23**

Cumulative Totals to Date						
	FEES BILLED	COSTS BILLED	HOLDBACK	FEES PAID	COSTS PAID	
	\$47,281.50	\$3,626.71	\$9,456.30	\$33,622.40	\$2,521.77	
Date:	1-Mar-23		Objection Deadline:		22-Mar-23	
MO/YR	PROFESSIONAL	RATE/HR	HOURS BILLED	TOTAL	HOLDBACK	AMT DUE
Nov-22	SUSAN N. GOODMAN	\$395.00	8.4	\$3,318.00	\$663.60	\$2,654.40
Dec-22	SUSAN N. GOODMAN	\$395.00	17.9	\$7,070.50	\$1,414.10	\$5,656.40
Jan-23	SUSAN N. GOODMAN	\$395.00	6.1	\$2,409.50	\$481.90	\$1,927.60
Feb-23	SUSAN N. GOODMAN	\$395.00	8.9	\$3,515.50	\$703.10	\$2,812.40
	TOTAL FEES			\$16,313.50	\$3,262.70	\$13,050.80
	TOTAL COSTS			\$1,457.72	\$0.00	\$1,457.72
	AMOUNT DUE - JAN/FEB			\$17,771.22	\$3,262.70	\$14,508.52



**Pivot Health Law, LLC**

EXHIBIT C - Detailed Invoices

**Invoice**

P.O. Box 69734  
Oro Valley, AZ 85737

**Invoice #:** 1252

**Invoice Date:** 12/13/2022

**Bill To:**

Northwest Sr Housing Corp.  
d/b/a The Plaza at Edgemere  
ND TX DAL 22-30659  
File No. 43415

Period: November 2022

Date	Description	Hours/Qty	Rate	Amount
11/2/2022	docket monitoring and pleading review at level consistent with role [DEs 749 - 755 noted with competing plans] high level review of documents with more detailed review to follow (.3)	0.3	395.00	118.50
11/3/2022	Docket monitoring and additional pleading review [DE 757 vs 754] (.2); hearing notice dates and NOA [DE 756, 758] (.1)	0.3	395.00	118.50
11/5/2022	Prepare Exhib B Oct 22	0.2	395.00	79.00
11/7/2022	TXTs and calendar invite for occurrence with facility ExDir (.1); attempt to reach Ex Dir and call with DON (.1); docket monitoring and pleading review at level consistent with role [DEs 767-769] noting case dynamics relative to voting and time extensions (.2)	0.4	395.00	158.00
11/9/2022	Msg left for resident counsel president re my understanding of incident and status (.1);	0.1	395.00	39.50
11/10/2022	Update call with resident council president re incident and case dynamics relative to residents (.3)	0.3	395.00	118.50
11/14/2022	Review and analyze Sept QAPI file	0.3	395.00	118.50
11/14/2022	Review DE 784 amended DIP and follow up FTI consultant re PCO implications	0.2	395.00	79.00
11/16/2022	Finalize and file CNO re DE 724 (3rd Mo Fees)	0.2	395.00	79.00
11/21/2022	Finalize and file 2015.1 pleading for 4th report	0.1	395.00	39.50
11/21/2022	Prepare and file 4th mo fee app and associated pleadings, serve	1	395.00	395.00
11/21/2022	Initial drafting 2nd interim fee app and associated pleadings	1.5	395.00	592.50
11/22/2022	docket monitoring and pleading review - 2d amend DIP DE 811	0.1	395.00	39.50

**Total**

**Payments/Credits**

**Balance Due**



**Pivot Health Law, LLC**

P.O. Box 69734  
Oro Valley, AZ 85737

# Invoice

**Invoice #:** 1252

**Invoice Date:** 12/13/2022

Period: November 2022

**Bill To:**

Northwest Sr Housing Corp.  
d/b/a The Plaza at Edgemere  
ND TX DAL 22-30659  
File No. 43415

Date	Description	Hours/Qty	Rate	Amount
11/23/2022	Update call from DON and ADON team re COVID status and recent self report background and upcoming site visit scheduling (.2); review DE 820 for potential resident relevance to role (.1)	0.3	395.00	118.50
11/25/2022	pro hac appearances with document updates (DE 821, 823) and DE 829 Obj (.1)	0.1	395.00	39.50
11/27/2022	finalize 2d interim fee app, file, serve (.5); docket monitoring and pleading review relative to upcoming hearings and party positions (DEs 831 - 834) (.2)	0.7	395.00	276.50
11/28/2022	Follow up Resident Counsel Leader re delayed visit (.1); Docket monitoring and pleading review at level consistent with role DE 839 - 840, 845 (.1)	0.2	395.00	79.00
11/29/2022	NWSH DE 848, 849 issues re 11/30 hearing (.2); brief update Ex Dir (.1); Draft 4th report noting site visit delay (.6);	0.9	395.00	355.50
11/30/2022	EML fr FA re budget fees/expenses through end case with review case spend and reponse (.2); attend hearing (.5) update call (finish) with Ex Dir (.2); review Oct QAPI mtg on Sept data (.3)	1.2	395.00	474.00
	Professional Fee Subtotal			3,318.00
11/12/2022	NWSH SV4 AIRFARE (CHANGE RETURN FLIGHT)		-23.00	-23.00
11/21/2022	NWSH 4TH MO FEE APP POSTAGE		4.80	4.80
11/27/2022	NWSH SV4 AIRFARE COST		370.98	370.98
	Total Reimbursable Expenses			352.78

**Total** \$3,670.78

**Payments/Credits** \$0.00

**Balance Due** \$3,670.78





**Pivot Health Law, LLC**

P.O. Box 69734  
Oro Valley, AZ 85737

# Invoice

**Invoice #:** 1258

**Invoice Date:** 1/13/2023

Period: December 1 - 31, 2022

**Bill To:**

Northwest Sr Housing Corp.  
d/b/a The Plaza at Edgemere  
ND TX DAL 22-30659  
File No. 43415

Date	Description	Hours/Qty	Rate	Amount
12/4/2022	finalize placeholder report, file, serve	0.2	395.00	79.00
12/7/2022	Docket monitoring and pleading review - DEs 869 (.4); 870 (.1); 871 (.3)	0.8	395.00	316.00
12/7/2022	Review DE 874 Replacement solicitation procedures	0.4	395.00	158.00
12/8/2022	follow up with CNO re visit	0.1	395.00	39.50
12/9/2022	Update call with Ex Dir	0.2	395.00	79.00
12/12/2022	Docket monitoring and pleading review relative to role - DE 887 W&E for upcoming hearing (.1); DE 898 - 900 with review of redline for directionality of changes (.5)	0.6	395.00	237.00
12/13/2022	Follow up DON and Ex Dir re state visit and confirming site visit (.1); prepare Nov Exhib B (.3)	0.4	395.00	158.00
12/14/2022	1/2 rate non-working travel: TUS to PHX (2.6/2 = 1.3); PHX to DAL (2.4/2 = 1.2); DAL to Hotel (.6/2 = .3)	2.8	395.00	1,106.00
12/15/2022	SV 4 - visit with new nursing leadership; stand-up team; wound/nephrology clinicians; executive leadership; dietary services; AL council president; facilities; therapy leadership; skilled/AL/memory units; AL leadership	7	395.00	2,765.00
12/15/2022	SV4 1/2 rate travel; Hotel to Edgemere am (.3); Edgemere to Love Field (.6); DAL to HOU (1.5); HOU to destination (1.0)= 3.4/2 1.7	1.7	395.00	671.50
12/15/2022	docket monitoring and pleading review - DE 914 Debt reply resident obj	0.2	395.00	79.00
12/16/2022	docket review of various orders and text docket entries relative to previous day hearings (.2); follow up email exchg with resident council president (.2);	0.4	395.00	158.00
12/19/2022	Docket monitoring and pleading review consistent with role - review DE 937 relative to resident records (.4); review DE 936, 935, 934 -	0.6	395.00	237.00

**Total**

**Payments/Credits**

**Balance Due**



**Pivot Health Law, LLC**

P.O. Box 69734  
Oro Valley, AZ 85737

# Invoice

**Invoice #:** 1258

**Invoice Date:** 1/13/2023

**Bill To:**

Northwest Sr Housing Corp.  
d/b/a The Plaza at Edgemere  
ND TX DAL 22-30659  
File No. 43415

Period: December 1 - 31, 2022

Date	Description	Hours/Qty	Rate	Amount
12/20/2022	finalize/file CNO for 4th mo fee (.1); review DE 943 amended order (.1)	0.2	395.00	79.00
12/21/2022	docket monitoring and pleading review at level consistent with role DEs 945, 946, 948	0.1	395.00	39.50
12/21/2022	Review DE 955 (.1); finalize CNO 2nd Int Fee and order upload, file (.2)	0.3	395.00	118.50
12/22/2022	Prepare 5th monthly fee statement	1.1	395.00	434.50
12/22/2022	Review DE 955 - revision to executory K rejections	0.1	395.00	39.50
12/27/2022	Docket monitoring and pleading review at level consistent with role - DE 969 amended cash collateral (.1)	0.1	395.00	39.50
12/28/2022	Docket monitoring for case pacing and calendar/hearing updates - DE 976 Hrg Notice	0.1	395.00	39.50
12/29/2022	Txt and EML exchnng DON and facilities re fire watch(.1); Call with Plaza Admin (.2); EML exchg Ex Dir (.1)	0.4	395.00	158.00
12/30/2022	Docket monitoring and pleading review - DE 980	0.1	395.00	39.50
	Professional Fee Subtotal			7,070.50
12/4/2022	NWSH SV4 AIRFARE Changes (COVID +)		96.00	96.00
12/4/2022	NWSH SV4 AIRFARE (change visit for COVID)		342.98	342.98
12/4/2022	NWSH SV4 AIRFARE (FLIGHT CHANGE DUE TO COVID)		-389.98	-389.98
12/4/2022	NWSH Mailing 2d Int Fee App (11/27 missed Nov Bill)		8.72	8.72
12/14/2022	NWSH SV 4 HOTEL (Doubletree Campbell Centre)		194.80	194.80
12/14/2022	NWSH SV4 MEALS (Doubletree - 8250 Rest/Bar)		22.40	22.40
12/15/2022	NWSH SV4 CAR RENTAL		111.45	111.45
12/17/2022	NWSH SV4 PARKING FEES/TOLLS (PHX Airport)		50.00	50.00

**Total**

**Payments/Credits**

**Balance Due**

P.O. Box 69734  
Oro Valley, AZ 85737

**Invoice #:** 1258  
**Invoice Date:** 1/13/2023

Northwest Sr Housing Corp.  
d/b/a The Plaza at Edgemere  
ND TX DAL 22-30659  
File No. 43415

Date	Description	Hours/Qty	Rate	Amount
12/22/2022	NWSH 5th Mo Fee App Postage		4.80	4.80
	Total Reimbursable Expenses			441.17

<b>Balance Due</b>	<b>\$7,511.67</b>
--------------------	-------------------



**Pivot Health Law, LLC**

P.O. Box 69734  
Oro Valley, AZ 85737

# Invoice

**Invoice #:** 1264

**Invoice Date:** 2/10/2023

**Bill To:**

Northwest Sr Housing Corp.  
d/b/a The Plaza at Edgemere  
ND TX DAL 22-30659  
File No. 43415

Period: January 1 - 31, 2023

Date	Description	Hours/Qty	Rate	Amount
1/3/2023	docket monitoring and notice document updates - DE 987 and 989 (.1); review pleadings 982, 983, 984, 990, 992 at level consistent with role (.2)	0.3	395.00	118.50
1/5/2023	Update call AUST	0.2	395.00	79.00
1/7/2023	Docket monitoring and pleading review at level to keep up case pacing and dynamics - DE 1007 obj	0.1	395.00	39.50
1/9/2023	Docket monitoring and pleading review consistent with role - DE 1014 withdrawal; NOA DE 1012 with document updates (.1)	0.1	395.00	39.50
1/11/2023	Calls x2 with DON re litigation hold	0.5	395.00	197.50
1/11/2023	EML to AUST re litigation doc hold (.1); docket monitoring with flurry filings relative to upcoming hearing with review of DEs 1024, 1025, and 1029 for case dynamic tracking in lieu of hearing attendance (.3)	0.4	395.00	158.00
1/12/2023	EML exchange and follow up call with AUST (.4); docket monitoring and review of DE 1033 (.1)	0.5	395.00	197.50
1/13/2023	Update call with Ex Dir re discussion with AUST and EML coming and report topics (.2); Draft EML and send to AUST for litmus test before sending out (.2)	0.4	395.00	158.00
1/16/2023	Prepare Exhib B Dec (.3); final edits and file CNO 5th mo fee (.2); draft EML to AUST for review relative to debtor litigation hold notice topic (.2)	0.7	395.00	276.50
1/17/2023	EML exchg with Ex Dir and Admin re notice issue and follow up request re litigation hold post petition (.1); docket monitoring and pleading review of DE 1047 (.1)	0.2	395.00	79.00

**Total**

**Payments/Credits**

**Balance Due**



**Pivot Health Law, LLC**

P.O. Box 69734  
Oro Valley, AZ 85737

# Invoice

**Invoice #:** 1264

**Invoice Date:** 2/10/2023

**Bill To:**

Northwest Sr Housing Corp.  
d/b/a The Plaza at Edgemere  
ND TX DAL 22-30659  
File No. 43415

Period: January 1 - 31, 2023

Date	Description	Hours/Qty	Rate	Amount
1/19/2023	docket monitoring and pleading review - pro hac update to notice documents [DE 1061 - 1069] notice document update and pleading review for case issues/pacing	0.3	395.00	118.50
1/20/2023	prepare, finalize, file, service 6th mo fee app (.8); prepare, finalize, file 5th 2015.1 (.2); docket monitoring and pleading review relative to role with document/calendar updates DE 1075 and 1081 (.1)	1.1	395.00	434.50
1/24/2023	Review various witness/exhib docket activity with focus on DE 1103 to confirm no PCO attendance needed at hearings	0.2	395.00	79.00
1/26/2023	Docket monitoring and pleading review - LOTS of audio hearing files -light review to make sure all outside resident concerns; update notice document with pro hac (Lombardo) .3	0.3	395.00	118.50
1/31/2023	Review 2 mo QAPI data reports with notes for follow up [.4 ea report] (.8)	0.8	395.00	316.00
	Professional Fees Subtotal			2,409.50
1/20/2023	NWSH Mailing 6th mo fee		4.80	4.80

**Total** \$2,414.30

**Payments/Credits** \$0.00

**Balance Due** \$2,414.30



**Pivot Health Law, LLC**

P.O. Box 69734  
Oro Valley, AZ 85737

# Invoice

**Invoice #:** 1267

**Invoice Date:** 3/1/2023

**Bill To:**

Northwest Sr Housing Corp.  
d/b/a The Plaza at Edgemere  
ND TX DAL 22-30659  
File No. 43415

Period: February 1 - 28, 2023

Date	Description	Hours/Qty	Rate	Amount
2/2/2023	Follow up with DON and facilities director re check in calls for upcoming report	0.1	395.00	39.50
2/3/2023	Initial Drafting 5th report (2.0); update call facilities for report (.3)	2.3	395.00	908.50
2/6/2023	update call DON re report draft and edits (2 calls - 31 min) (.5); initial revisions to report draft (.5); EML team with exchanges Plaza Admin and DON re desk review (.2); additional revisions to report (.4);	1.6	395.00	632.00
2/6/2023	hearing to understand ruling on building issues relative to PCO role, upcoming report and visit deadlines (.5) w/ follow-up facilities (.1); pleading review DEs 1149 - 1150 (.1)	0.7	395.00	276.50
2/7/2023	call w Debtor counsel re implications Jan 6 court rulings on case timing and PCO site visits -20 min (.3); EML exchg Plaza Admin re same (.1)	0.4	395.00	158.00
2/9/2023	Docket monitoring and pleading review at level consistent with role - pleadings DE 1175 - 1177 re Bay 9 position and joinders	0.2	395.00	79.00
2/13/2023	Prepare 6th CNO (.1)	0.1	395.00	39.50
2/14/2023	docket monitoring and pleading review at level consistent with role - DE 1201 Obj to Plan confirmation	0.2	395.00	79.00
2/15/2023	partial listen DE 1213 re case status and dynamics r/t LL/Debtor to check for court decision and impact case timing	0.2	395.00	79.00
2/15/2023	Prepare Exhib B Jan	0.3	395.00	118.50
2/20/2023	Management of docket flurry in advance of upcoming hearing at level consistent with role for issue spotting relative case timing and SV planning and pro hac notice updates- DEs 1241-1248 (.3); 1251 - 52 (.1); 1249-50 (.3)	0.7	395.00	276.50

**Total**

**Payments/Credits**

**Balance Due**



**Pivot Health Law, LLC**

P.O. Box 69734  
Oro Valley, AZ 85737

# Invoice

**Invoice #:** 1267

**Invoice Date:** 3/1/2023

**Bill To:**

Northwest Sr Housing Corp.  
d/b/a The Plaza at Edgemere  
ND TX DAL 22-30659  
File No. 43415

Period: February 1 - 28, 2023

Date	Description	Hours/Qty	Rate	Amount
2/20/2023	Review DE 1233 for K assumptions w/ resident care connections	0.1	395.00	39.50
2/22/2023	docket monitoring and pleading review at level consistent with role - DE 1265 MOR (.1); listen to parts of DE 1260, 61,63 in attempt to understand case status relative to timing (.4)	0.5	395.00	197.50
2/28/2023	review prior notes, QAPI to prepare CNO call (.3); Update call with CNO Plaza (1.0); update call Debtor counsel re case progress/timelines (.2)	1.5	395.00	592.50
	Professional Fee Subtotal			3,515.50
2/16/2023	NWSH SV 5 AIRFARE with changes for car rental availability		545.98	545.98
2/16/2023	NWSH SV 5 AIRFARE with changes for car rental availability		-271.01	-271.01
2/16/2023	NWSH SV 5 AIRFARE with changes for car rental availability		130.02	130.02
2/16/2023	NWSH SV 5 AIRFARE with changes for car rental availability		293.98	293.98
2/16/2023	NWSH SV 5 AIRFARE with changes for car rental availability		-40.00	-40.00
	Total Reimbursable Expenses			658.97

**Total** \$4,174.47

**Payments/Credits** \$0.00

**Balance Due** \$4,174.47

**Exhibit D**  
**Proposed Form of Order**

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

**IN RE:**

**NORTHWEST SENIOR HOUSING  
CORPORATION, *et al.*,<sup>1</sup>**

**Debtors.**

§  
§  
§  
§  
§  
§  
§

**CHAPTER 11**

**CASE NO: 22-30659 (MVL)**

**(Jointly Administered)**

---

**ORDER APPROVING THIRD INTERIM FEE APPLICATION OF  
SUSAN N. GOODMAN FOR COMPENSATION AND REIMBURSEMENT OF  
EXPENSES AS PATIENT CARE OMBUDSMAN FOR PERIOD  
NOVEMBER 1, 2022, THROUGH FEBRUARY 28, 2023**

The court having considered the *Third Interim Application of Susan N. Goodman for Compensation and Reimbursement of Expenses as Patient Care Ombudsman for Period November 1, 2022, through February 28, 2023* (the “**Application**”), and it appearing to the court that (a) the compensation was reasonable and necessary; (b) notice of the Application was sufficient, appropriate, and in accordance with Local Bankruptcy Rules of this District and the Federal Rules of Bankruptcy Procedure; (c) no

---

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



objections or responsive pleadings have been filed; and, (d) good cause exists to grant the Application;

IT IS HEREBY ORDERED, ADJUDGED, AND DECREED AS FOLLOWS:

1. The Application is APPROVED.
2. The Applicant is awarded, on an interim basis, fees of \$16,313.50 and reimbursement of actual and necessary expenses in the amount of \$1,457.72, collectively totaling **\$17,771.22** (the “**Award**”) for services rendered as the Patient Care Ombudsman for the period of November 1, 2022, through February 28, 2023.
3. The Debtors are authorized and directed to pay the Award, inclusive of any applicable fee holdback in satisfaction of all such allowed fees and expenses that have not previously been paid pursuant to the Interim Compensation Order.
4. Nothing in this Order shall prejudice or be deemed or construed as a waiver of any party’s right to object to a final fee application filed with the court in accordance with the Bankruptcy Code on any ground regardless of whether the party objected to a monthly or interim fee application, and this Order shall be without prejudice to any position any party may take with respect to any future fee application in this case.
5. The court retains jurisdiction to hear and determine all matters arising from or related to the interpretation, implementation, or enforcement of this Order.

###END OF ORDER###

SUBMITTED BY:

/s/Susan N. Goodman, RN JD (TX Bar 24117585)  
PIVOT HEALTH LAW, LLC  
P.O. Box 69734  
Oro Valley, Arizona 85737  
Ph: (520) 744-7061 | Fax: (520) 575-4075  
sgoodman@pivothealthaz.com  
*Patient Care Ombudsman*