

Liz Boydston (SBN 24053684)
Trinitee G. Green (SBN 24081320)
Polsinelli PC
2950 N. Harwood, Suite 2100
Dallas, Texas 75201
Telephone: (214) 397-0030
Facsimile: (214) 397-0033
lboydston@polsinelli.com
tggreen@polsinelli.com

Jeremy R. Johnson (Admitted *Pro Hac Vice*)
Brenna A. Dolphin (Admitted *Pro Hac Vice*)
Polsinelli PC
600 3rd Avenue, 42nd Floor
New York, New York 10016
Telephone: (212) 684-0199
Facsimile: (212) 684-0197
jeremy.johnson@polsinelli.com
bdolphin@polsinelli.com

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**

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

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 NOVEMBER 29, 2022, AT 2:00 P.M. (CT)**

MATTERS NOT GOING FORWARD:

1. *Debtors' Motion for Entry of an Order Amending the Final Order (1) Authorizing Debtors in Possession to Obtain Post-Petition Financing; (2) Authorizing Debtors in Possession to Use Cash Collateral; (3) Providing Adequate Protection; and (4) Granting Liens, Security Interests and Superpriority Claims* [Docket No. 512]

Response Date: N/A

Status: This motion has been withdrawn.

Related Documents:

- a. Notice of Hearing [Docket No. 520]
- b. Amended Notice of Hearing [Docket No. 526]
- c. Certificate of Service [Docket No. 531]
- d. Certificate of Service [Docket No. 532]
- e. Certificate of Service [Docket No. 533]
- f. Notice of Withdrawal of Document [Docket No. 791]

Response(s):

- a. Objection of the Official Committee of Unsecured Creditors to the Debtors' Motion to Amend the DIP Financing Order [Docket No. 557]

2. *Intercity Investment Properties, Inc.'s Motion to Dismiss Chapter 11 Cases Under 11 U.S.C. § 1112(b)* [Docket No. 541]

Response Date: N/A

Status: This motion has been withdrawn.

Related Documents:

- a. Notice of Status Conference [Docket No. 542]
- b. Witness and Exhibit List for Hearing on August 24, 2022 at 1:30 p.m. (CT) [Docket No. 555]
- c. Certificate of Service [Docket No. 567]

- d. Notice of hearing on Intercity Investment Properties, Inc.'s Motion to Dismiss Chapter 11 Cases Under 11 U.S.C. § 1112(b) [Docket No. 599]

Response(s):

- a. Debtors' Preliminary Objection to Motion to Dismiss Chapter 11 cases Under 11 U.S.C. § 1112(b) [Docket No. 564]
- b. The Trustee's Objection to Intercity Investment Properties, Inc.'s Motion to Dismiss Chapter 11 Cases Under 11 U.S.C. § 1112(b) [Docket No. 622]
- c. Debtors' Objection to Intercity Investment Properties, Inc.'s Motion to Dismiss Chapter 11 Cases Under 11 U.S.C. § 1112(b) [Docket No. 624]
- d. Objection of the Official Committee of Unsecured Creditors to Intercity Investment Properties, Inc.'s Motion to Dismiss Chapter 11 Cases Under 11 U.S.C. § 1112(b) [Docket No. 627]
- e. Intercity Investment Properties, Inc.'s Reply in Support of Motion to Dismiss Chapter 11 Cases Under 11 U.S.C. § 1112(b) [Docket No. 630]
- f. Notice of Withdrawal [Docket No. 832]

CONTESTED MATTER GOING FORWARD:

- 3. *Intercity Investment Properties, Inc.'s Motion Seeking an Order (I) Allowing Administrative Expense Claim for Postpetition Rent Under U.S.C. §503(b)(1); (II) Directing Escrow Agent to Release Escrowed Funds and Terminating Rent Escrow agreement; and (III) Requiring Debtors to Pay Postpetition Rent in the Ordinary Course* [Docket No. 691]

Response Date: October 23, 2022

Status: Continued from October 26, 2022 Omnibus Hearing. This matter is going forward as a Status Conference. *See* Docket No. 736.

Related Documents:

- a. Notice of Hearing [Docket No. 701]

Response(s):

- a. Comment of the Official Committee of Unsecured Creditors to Intercity Investment Properties, Inc.'s Motion for Administrative Expense Claim [Docket No. 719]

- b. Debtors' Objection to Intercity Investment Properties, Inc.'s Motion Seeking an Order (I) Allowing Administrative Expense Claim for Postpetition Rent Under 11 U.S.C. § 503(b)(1); (II) Directing Escrow Agent to Release Escrowed Funds and Terminating Rent Escrow Agreement; and (III) Requiring Debtors to Pay Postpetition Rent in the Ordinary Course [Docket No. 721]
- c. Reply in Support of Intercity Investment Properties, Inc.'s Motion Seeking an Order (I) Allowing Administrative Expense Claim for Postpetition Rent Under 11 U.S.C. § 503(b)(1); (II) Directing Escrow Agent to Release Escrowed Funds and Terminating Rent Escrow Agreement; and (III) Requiring Debtors to Pay Postpetition Rent in the Ordinary Course [Docket No. 777]
- d. Debtors' Sur-Reply to Intercity Investment Properties, Inc.'s Reply in Support of Motion Seeking an Order (I) Allowing Administrative Expense Claim for Postpetition Rent Under 11 U.S.C. § 503(b)(1); (II) Directing Escrow Agent to Release Escrowed Funds and Terminating Rent Escrow Agreement; and (III) Requiring Debtors to Pay Postpetition Rent in the Ordinary Course [Docket No. 790]
- e. Surreponse in Support of Intercity Investment Properties, Inc.'s Motion Seeking an Order (I) Allowing Administrative Expense Claim for Postpetition Rent Under 11 U.S.C. § 503(b)(1); (II) Directing Escrow Agent to Release Escrowed Funds and Terminating Rent Escrow Agreement; and (III) Requiring Debtors to Pay Postpetition Rent in the Ordinary Course [Docket No. 795]
- f. Amended Surreponse in Support of Intercity Investment Properties, Inc.'s Motion Seeking an Order (I) Allowing Administrative Expense Claim for Postpetition Rent Under 11 U.S.C. § 503(b)(1); (II) Directing Escrow Agent to Release Escrowed Funds and Terminating Rent Escrow Agreement; and (III) Requiring Debtors to Pay Postpetition Rent in the Ordinary Course [Docket No. 796]
- g. Second Amended Surreponse in Support of Intercity Investment Properties, Inc.'s Motion Seeking an Order (I) Allowing Administrative Expense Claim for Postpetition Rent Under 11 U.S.C. § 503(b)(1); (II) Directing Escrow Agent to Release Escrowed Funds and Terminating Rent Escrow Agreement; and (III) Requiring Debtors to Pay Postpetition Rent in the Ordinary Course [Docket No. 798]

- h. Withdrawal First Amended Response of Administrative Claim [Docket No. 799]
- i. Withdrawal Second Amended Surreponse [Docket No. 800]
- j. Third Amended Surreponse in Support of Intercity Investment Properties, Inc.'s Motion Seeking an Order (I) Allowing Administrative Expense Claim for Postpetition Rent Under 11 U.S.C. § 503(b)(1); (II) Directing Escrow Agent to Release Escrowed Funds and Terminating Rent Escrow Agreement; and (III) Requiring Debtors to Pay Postpetition Rent in the Ordinary Course [Docket No. 802]

ADVERSARY MATTERS GOING FORWARD (22-03040):

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

Response Date: N/A

Status: Continued from October 26, 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]

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

Response Date: N/A

Status: Continued from October 26, 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.

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

Response Date: N/A

Status: Continued from October 26, 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]

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

Response Date: N/A

Status: Continued from October 26, 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]

ADVERSARY MATTER GOING FORWARD (22-03073):

8. *Agreed Motion to Abate Scheduling Order* [Docket No. 5]

Response Date: N/A

Status: This matter is going forward as a Status Conference.

Related Documents:

- a. Notice of Hearing re: Agreed Motion to Abate Scheduling Order [Docket No. 6]
- b. Notice of Status Conference [Docket No. 10]
- c. Order re: Agreed Motion to Abate Scheduling Order [Docket No. 11]

Response: None.

Dated: November 28, 2022
Dallas, Texas

POLSINELLI PC

/s/ Trinitee G. Green

Liz Boydston (SBN 24053684)
Trinitee G. Green (SBN 24081320)
2950 N. Harwood, Suite 2100
Dallas, Texas 75201
Telephone: (214) 397-0030
Facsimile: (214) 397-0033
lboydston@polsinelli.com
tggreen@polsinelli.com

– and –

Jeremy R. Johnson (Admitted *Pro Hac Vice*)
Brenna A. Dolphin (Admitted *Pro Hac Vice*)
600 3rd Avenue, 42nd Floor
New York, New York 10016
Telephone: (212) 684-0199
Facsimile: (212) 684-0197
jeremy.johnson@polsinelli.com
bdolphin@polsinelli.com

– and –

Jerry L. Switzer, Jr. (Admitted *Pro Hac Vice*)
150 N. Riverside Plaza, Suite 3000
Chicago, Illinois 60606
Telephone: (312) 819-1900
Facsimile: (312) 819-1910
jswitzer@polsinelli.com

– and –

Thomas Kokoruda (Admitted *Pro Hac Vice*)
Andrew J. Ennis (Admitted *Pro Hac Vice*)
900 West 48th Place, Suite 900
Kansas City, Missouri 64112
Telephone: (816) 753-1000
Facsimile: (816) 753-1536
tkokoruda@polsinelli.com
aennis@polsinelli.com

COUNSEL TO THE DEBTORS
AND DEBTORS IN POSSESSION AND
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