

**PERKINS COIE LLP**

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*Counsel for Lifespace Communities, Inc.*

**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>

Debtor.

Chapter 11

Case No. 22-30659 (MVL)

**AGREED MOTION TO WITHDRAW AND  
SUBSTITUTE LOCAL COUNSEL OF RECORD**

Lifespace Communities, Inc. ("Lifespace") hereby moves the Court to permit existing local counsel of record for Lifespace, John D. Penn and Kathleen Allare of Perkins Coie LLP to withdraw and to substitute James P. Muenker of DLA Piper LLP (US) as local counsel of record, and would respectfully show this Court as follows:

This Court has jurisdiction to hear this matter pursuant to 28 U.S.C. § 157(b)(2)(A). Local Bankruptcy Rule 2091-1 provides the legal predicate for the relief sought. Venue is proper in this Court under 28 U.S.C. § 1409.

<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.



Lifespace is currently represented in this matter by Cooley LLP, as lead counsel, and by John D. Penn and Kathleen Allare of Perkins Coie LLP, as local counsel. Lifespace wishes to substitute local counsel in this case and all related contested matters and adversary proceedings.

Accordingly, Lifespace moves to allow John D. Penn and Kathleen Allare, of Perkins Coie LLP, to withdraw as local counsel for Lifespace and James P. Muenker (Texas Bar No. 24002659) of DLA Piper US will serve as substitute local counsel for Lifespace in this case and all related contested matters and adversary proceedings.

Substitution of local counsel will not delay this matter in any way. Cooley LLP will continue to represent Lifespace as lead counsel.

The contact information for substitute local counsel is as follows:

James P. Muenker  
DLA Piper LLP (US)  
1900 N. Pearl Street, Suite 2200  
Dallas, Texas 75201  
Telephone: (214) 743-4500  
Facsimile: (214) 743-4545  
[james.muenker@us.dlapiper.com](mailto:james.muenker@us.dlapiper.com)

**WHEREFORE**, Lifespace moves the Court to enter an order (1) permitting John D. Penn and Kathleen Allare of Perkins Coie LLP to withdraw as local counsel of record for Lifespace; (2) allowing James P. Muenker of DLA Piper LLP (US) to substitute as local counsel of record in this case and all related contested matters and adversary proceedings; and (3) for all other relief, legal or equitable, that would be appropriate.

*[Signature Page Follows]*

Dated: November 27, 2023

By: /s/ **John D. Penn**  
John D. Penn  
Texas Bar No. 15752300  
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*Counsel for Lifespace Communities, Inc.*

**AGREED:**

By: /s/ **James Muenker**  
**DLA PIPER LLP (US)**  
James Muenker  
Texas Bar No. 24002659  
1900 N. Pearl Street, Suite 2200  
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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.*<sup>2</sup>

Debtor.

Chapter 11

Case No. 22-30659 (MVL)

**ORDER GRANTING AGREED MOTION TO WITHDRAW  
AND SUBSTITUTE COUNSEL OF RECORD**

Came on for consideration the *Agreed Motion to Withdraw and Substitute Local Counsel of Record* (the “Motion”) filed by Lifespace Communities, Inc. (“Lifespace”), seeking an order of the Court permitting John D. Penn and Kathleen Allare of Perkins Coie LLP to withdraw as local counsel for Lifespace and to substitute James P. Muenker of DLA Piper LLP (US) as local counsel

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<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.

of record for Lifespace in this case and all related contested matters and adversary proceedings. The Court, having considered the Motion, having found that the Motion complies with the requirements of Local Bankruptcy Rule 2091-1, and that there is just cause for granting the relief requested therein, hereby ORDERS as follows:

1. John D. Penn and Kathleen Allare of Perkins Coie LLP are hereby permitted to withdraw as counsel of record for Lifespace in this case and all related contested matters and adversary proceedings.

2. James P. Muenker of DLA Piper LLP (US) is hereby substituted as local counsel for Lifespace in this case and all related contested matters and adversary proceedings.

### END OF ORDER ###

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2. James P. Muenker of DLA Piper LLP (US) is hereby substituted as local counsel for Lifespace in this case and all related contested matters and adversary proceedings.

### END OF ORDER ###