

Trinitee G. Green (SBN 24081320)
1950 N. Harwood, Suite 2100
Dallas, TX 75201
Telephone: (214) 754-5787
Facsimile: (214) 481-1872
tggreen@polsinelli.com

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

In re:

Northwest Senior Housing Corporation, *et al.*,

Liquidating Debtors.

Chapter 11

Case No. 22-30659 (MVL)

(Jointly Administered)

**MOTION FOR WITHDRAWAL OF APPEARANCE AS COUNSEL FOR
LIQUIDATING DEBTORS AND REQUEST TO CEASE SERVICE OF NOTICES,
ORDERS, PLEADINGS, AND DOCUMENTS**

THIS MOTION SEEKS AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.

Brenna A. Dolphin, Esq. hereby respectfully requests withdrawal of her appearance as counsel of record for Debtor Northwest Senior Housing Corporation (“**Edgemere**”), Jointly



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Administered Debtor Senior Quality Lifestyles Corporation (“**SQLC**”), the Liquidating Debtors, and/or Leif M. Clark, Trustee of the Edgemere Litigation Trust (“**Trustee**”), in accordance with Rule 2091-1 of the Local Bankruptcy Rules for the Northern District of Texas, Polsinelli PC (“**Polsinelli**”).¹

The withdrawal is limited to Brenna A. Dolphin, Esq. and will not impact the continued representation of Edgemere, SQLC, the Liquidating Debtors, and/or the Trustee by other attorneys who have entered appearances in these proceedings. As such the withdrawal of Brenna A. Dolphin, Esq. will not cause any disruption in the above-captioned matter.

The undersigned counsel of record and other Polsinelli attorneys will continue to represent Edgemere, the Liquidating Debtors, and Trustee, they are the succeeding attorneys, and, therefore, Polsinelli PC requests authority from the Court to permit Brenna A. Dolphin, Esq. to withdraw as counsel of record from the above-captioned matter.

WHEREFORE, pursuant to Local Rule 2091-1, Polsinelli PC respectfully requests that this Court grant this Motion and enter an order withdrawing the appearance of Brenna A. Dolphin, Esq. as counsel for the Edgemere, SQLC, the Liquidating Debtors, and/or the Trustee in the above-

¹ Out of an abundance of caution, all potential parties in interest are listed here, notwithstanding Section 4.6 of the Plan, which provides as follows:

Debtors shall not be Reorganized Debtors. Upon the Effective Date, Debtors shall each be deemed to be dissolved without any further action by the Debtors or the Bankruptcy Court, including the filing of any documents with the secretary of state of Texas. The Plan shall constitute a decree of dissolution with respect to each of the Debtors. For the avoidance of doubt, Debtors shall each be deemed to remain intact solely with respect to the preparation, filing, review, and/or resolution of applications and motions to be filed following the Effective Date for, among other things, the assertion of Professional Claims or to satisfy any obligations of the Debtors contained in the Asset Purchase Agreement or related documents.

See § 4.6 of Plan, Docket No. 1241.

captioned action and removing her from applicable service lists, including the Court's CM/ECF electronic notification list and the official service list.

Dated: November 27, 2023
Dallas, Texas

POLSINELLI PC

/s/ Trinitee G. Green
Trinitee G. Green (SBN 24081320)
2950 N. Harwood, Suite 2100
Dallas, Texas 75201
Telephone: (214) 397-0030
Facsimile: (214) 397-0033
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

COUNSEL TO THE LIQUIDATING
DEBTORS

CERTIFICATE OF CONFERENCE

In compliance with Local Bankruptcy Rule 7007-1, the undersigned counsel represents that she sent email correspondence, dated November 27, 2023, to impacted parties at the email addresses listed below, wherein counsel communicated her intention to file – and seek the relief sought in – the foregoing motion. In response, Ms. Green received responses as indicated below.

/s/ Trinitee G. Green
Trinitee G. Green

Party	Email Addresses	Response
Liquidating Debtors, Edgemere and SQLC c/o Nick Harshfield	Nick.Harshfield@lifespacecommunities.com	Unopposed
Leif M. Clark, Trustee of the Edgemere Litigation Trust	lmclark@leifmclark.com	Unopposed

CERTIFICATE OF SERVICE

I certify that on November 27, 2023, a true and correct copy of the foregoing *Motion for Withdrawal of Appearance as Counsel* was served by the Court's electronic filing system to all parties authorized to receive electronic notice in the above-captioned action.

/s/ Trinitee G. Green
Trinitee G. Green

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ORDER

The Court has considered the *Motion for Withdrawal of Appearance as Counsel for the Liquidating Debtors and Request to Cease Service of Notices, Orders, Pleadings, and Documents* filed and any responses or replies, and has concluded that the motion shall be GRANTED.

IT IS THEREFORE ORDERED that the appearance of Brenna A. Dolphin, Esq. on behalf of Northwest Senior Housing Corporation (“**Edgemere**”), Senior Quality Lifestyles Corporation (“**SQLC**”), the Liquidating Debtors, and/or Leif M. Clark, Trustee of the Edgemere Litigation Trust (“**Trustee**”), is withdrawn and that service of any notices, orders, pleadings, and documents on Brenna A. Dolphin, Esq. shall cease.

IT IS SO ORDERED.

End of Order

Submitted By:

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