

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

In re: Northwest Senior Housing Corporation, et al., Debtors.¹	§ § § § § §	Chapter 11 Case No. 22-30659 (MVL) (Jointly Administered)
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**CERTIFICATE OF NO OBJECTION TO INDEPENDENT
CO-EXECUTORS' MOTION FOR AN ORDER DIRECTING
THE TRUSTEE OF THE RESIDENTS TRUST TO DISTRIBUTE
AMOUNTS OWED TO THE ESTATE OF DOROTHY COLLINS TORBERT**

1. On November 20, 2023, Michael James Collins, Nancy Collins Fisher, and Stuart Maryman Bumpas, as Independent Co-Executors to the Estate of Dorothy Collins Torbert (such co-executors, collectively, the “*Co-Executors*”), filed the *Independent Co-Executors’ Motion for an Order Directing the Trustee of the Residents Trust to Distribute Amounts Owed to the Estate of Dorothy Collins Torbert* [Docket No. 1744] (the “*Motion*”). Objections to the Motion were required to be filed and served by December 11, 2023 (the “*Objection Deadline*”).

2. The Co-Executors file this Certificate of No Objection and represent to the Court that the Objection Deadline has passed and no objection to the Motion has been filed on the docket or otherwise asserted.

3. Therefore, the Co-Executors respectfully request entry of the proposed order attached as **Exhibit A** at the earliest convenience of the Court.

[Remainder of Page Intentionally Left Blank]

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 (2699).



Dated: December 12, 2023

Respectfully submitted,

/s/ Bradley R. Foxman

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**COUNSEL TO INDEPENDENT CO-
EXECUTORS TO THE ESTATE OF
DOROTHY COLLINS TORBERT**

CERTIFICATE OF SERVICE

I certify that on December 12, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Northern District of Texas.

/s/ Sara E. Zoglman

One of Counsel

EXHIBIT A

Proposed Order

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

In re:	§	Chapter 11
	§	
Northwest Senior Housing Corporation,	§	Case No. 22-30659 (MVL)
<i>et al.</i>,	§	
	§	(Jointly Administered)
Debtors.¹	§	

**ORDER DIRECTING THE TRUSTEE
OF THE RESIDENTS TRUST TO DISTRIBUTE
AMOUNTS OWED TO THE ESTATE OF DOROTHY COLLINS TORBERT**

Upon consideration of the motion (the “*Motion*”)² filed by Michael James Collins, Nancy Collins Fisher, and Stuart Maryman Bumpas, as Independent Co-Executors to the Estate of Dorothy Collins Torbert (such co-executors, collectively, the “*Co-Executors*” and such estate, the “*DCT Estate*”), seeking entry of an order (the “*Order*”): directing the Trustee to promptly distribute the Refundable Resident Deposit to any of the Co-Executors on account of the Trust Interests and granting related relief; and the Court having found that it has jurisdiction to consider the Motion and the relief requested therein pursuant to sections 105(a) of the Bankruptcy Code; and the Court having found that consideration of the Motion and the relief requested therein is a

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² Capitalized terms not otherwise defined herein shall have the meanings given to them in the Motion.

core proceeding pursuant to 28 U.S.C. § 157(b); and the Court having found that venue of this proceeding in this District is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that notice of the Motion as set forth therein is sufficient under the circumstances; and the Court having reviewed the Motion; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before the Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Motion is **GRANTED** as set forth herein.
2. The DCT Estate is the proper holder of the Trust Interests on account of the refundable resident deposit in an amount equal to \$626,310.00 (the “***Refundable Resident Deposit***”).
3. The Trustee is authorized and directed to promptly, and in no event later than 30 days following the entry of this Order, distribute the Refundable Resident Deposit to any of the Co-Executors, in accordance with the terms of this Order and the Residents Trust Agreement.
4. The Trustee, DCT Estate, the Co-Executors, and DCT Estate Beneficiaries are authorized to take any and all actions necessary and proper to implement and effectuate the relief granted in this Order in accordance with the Motion.
5. Adequate notice and opportunity for a hearing on the Motion has been provided and such notice satisfies the requirements of the Bankruptcy Rules and Local Bankruptcy Rules.
6. This Order is immediately valid and fully effective upon its entry and the 14 day stay pursuant to Bankruptcy Rule 4001(a) is hereby waived.
7. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

END OF ORDER