

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

In re:

**TARRANT COUNTY SENIOR LIVING
CENTER, INC.¹**

Debtor.

§
§ **CHAPTER 11**
§
§ **CASE NO. 19-33759 (SGJ)**
§
§ **Ref. Docket Nos. 3-16, 23 and 26**
§

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
) ss.:
COUNTY OF NEW YORK)

WING CHAN, being duly sworn, deposes and says:

1. I am employed as a Noticing Coordinator by Epiq Corporate Restructuring, LLC, located at 777 Third Avenue, New York, New York 10017. I am over the age of eighteen years and am not a party to the above-captioned action.
2. I caused to be served the:
 - a. “Notice of Designation as Complex Chapter 11 Bankruptcy Case,” dated November 5, 2019 [Docket No. 3], (the “Complex Case Notice”),
 - b. “Motion of the Debtor for Entry of an Order (I) Extending Time for Debtor to File Its Schedules and Statements and (II) Permanently Waiving Same Upon Confirmation of Debtor’s Prepackaged Plan of Reorganization,” dated November 5, 2019 [Docket No. 4], (the “Extension Motion”),
 - c. “Debtor’s Application for Authorization to Employ and Retain Epiq Corporate Restructuring, LLC, as Notice, Claims, and Solicitation Agent, Effective *Nunc Pro Tunc* to the Petition Date,” dated November 5, 2019 [Docket No. 5], (the “Epiq Application”),
 - d. “Motion of the Debtor for Entry of an Order Authorizing the Implementation of Procedures to Maintain and Protect Confidential Resident and Patient Information,” dated November 5, 2019 [Docket No. 6], (the “Confidentiality Motion”),

¹ The last four digits of the Debtor’s federal tax identification number is 8602.

- e. “Motion of the Debtor for Entry of Interim and Final Orders Authorizing (I) Continued Use of Existing Cash Management System, (II) Maintenance of Existing Bank Accounts, (III) Continued Use of Existing Business Forms, and (IV) an Extension of Time to Comply with 11 U.S.C. § 345(b) Deposit and Investment Requirements,” dated November 5, 2019 [Docket No. 7], (the “Cash Management Motion”),
- f. “Motion of the Debtor for Entry of an Order (I) Authorizing the Debtor to (A) Escrow Postpetition Entrance Fees in Its Existing Entrance Fee Escrow Account and (B) Refund Postpetition Entrance Fees Under Certain Circumstances During the Chapter 11 Case; and (II) Granting Related Relief,” dated November 5, 2019 [Docket No. 8], (the “Escrow Motion”),
- g. “Motion of the Debtor for Interim and Final Orders (I) Authorizing (A) the Debtor to Pay Certain Prepetition Salaries, Wages, and Compensation and (B) the Continuation of Employee Benefit Programs and (II) Directing Banks to Honor and Process Checks and Transfers Related to Such Employee Obligations,” dated November 5, 2019 [Docket No. 9], (the “Wages Motion”),
- h. “Motion of the Debtor for Entry of Interim and Final Orders Authorizing the Debtor to Pay Certain Prepetition Taxes,” dated November 5, 2019 [Docket No. 10], (the “Tax Motion”),
- i. “Motion of the Debtor for Entry of Interim and Final Orders (I) Prohibiting Utility Providers from Altering, Refusing or Discontinuing Service, (II) Deeming the Utility Providers Adequately Assured of Future Performance, and (III) Establishing Procedures for Determining Requests for Additional Adequate Assurance,” dated November 5, 2019 [Docket No. 11], (the “Utility Motion”),
- j. “Motion of the Debtor for Entry of Interim and Final Orders (I) Authorizing the Debtor to (A) Maintain Existing Insurance Policies and Pay All Insurance Obligations Arising Thereunder and (B) Renew, Revise, Extend, Supplement, Change or Enter into New Insurance Policies, and (II) Granting Certain Related Relief,” dated November 5, 2019 [Docket No. 12], (the “Insurance Motion”),
- k. “Motion of the Debtor for Entry of Interim and Final Orders, Authorizing, But Not Directing, the Debtor to Continue Its Prepetition Business Operations, Policies, and Practices and Pay Related Claims in the Ordinary Course of Business on a Postpetition Basis,” dated November 5, 2019 [Docket No. 13], (the “OCP Motion”),
- l. “Motion of the Debtor for Interim and Final Orders (I) Authorizing the Debtor to Use the Cash Collateral of UMB Bank, N.A., as Trustee; (II) Providing UMB Bank, N.A., as Trustee, Adequate Protection; and (III) Modifying the Automatic Stay,” dated November 5, 2019 [Docket No. 14], (the “Cash Collateral Motion”),

- m. “Motion of the Debtor for Entry of an Order (I) Scheduling Combined Hearing on (A) Adequacy of Disclosure Statement and (B) Confirmation of Prepackaged Plan of Reorganization; (II) Fixing Related Objection Deadlines and Approving Notice Procedures; (III) Approving Prepetition Solicitation Procedures; (IV) Conditionally Directing the United States Trustee Not to Convene Section 341 Meeting of Creditors; and (V) Granting Related Relief,” dated November 5, 2019 [Docket No. 15], (the “Hearing Motion”),
- n. “Declaration of Louis E. Robichaux IV in Support of Chapter 11 Petition and First Day Pleadings,” dated November 5, 2019 [Docket No. 16], (the “Declaration”),
- o. “Notice of Commencement of Chapter 11 Case and Filing of Certain First Day Motions,” dated November 6, 2019 [Docket No. 23], (the “Commencement Notice”), and
- p. “Notice of Agenda of Matters Scheduled for Hearing on November 7, 2019 at 9:30 A.M. (CST),” dated November 6, 2019 [Docket No. 26], (the “Agenda”),

by causing true and correct copies of the:

- i. Complex Case Notice, Extension Motion, Epiq Application, Confidentiality Motion, Cash Management Motion, Escrow Motion, Wages Motion, Tax Motion, Utility Motion, Insurance Motion, OCP Motion, Cash Collateral Motion and Hearing Motion, to be enclosed securely in separate postage pre-paid envelopes and delivered via overnight mail to those parties listed on the annexed Exhibit A, on November 5, 2019,
- ii. Cash Management Motion, Wages Motion, OCP Motion and Cash Collateral Motion, to be enclosed securely in separate postage pre-paid envelopes and delivered via overnight mail to those parties listed on the annexed Exhibit B, on November 5, 2019,
- iii. Escrow Motion, to be enclosed securely in separate postage pre-paid envelopes and delivered via overnight mail to those parties listed on the annexed Exhibit C, on November 5, 2019,
- iv. Wages Motion, to be enclosed securely in separate postage pre-paid envelopes and delivered via overnight mail to those parties listed on the annexed Exhibit D, on November 5, 2019,
- v. Wages Motion and Tax Motion, to be enclosed securely in separate postage pre-paid envelopes and delivered via overnight mail to those parties listed on the annexed Exhibit E, on November 5, 2019,
- vi. Utility Motion, to be enclosed securely in separate postage pre-paid envelopes and delivered via overnight mail to those parties listed on the annexed Exhibit F, on November 5, 2019,

- vii. Insurance Motion, to be enclosed securely in separate postage pre-paid envelopes and delivered via overnight mail to those parties listed on the annexed Exhibit G, on November 5, 2019,
- viii. Cash Collateral Motion, to be enclosed securely in separate postage pre-paid envelopes and delivered via overnight mail to those parties listed on the annexed Exhibit H, on November 5, 2019,
- ix. Complex Case Notice, Extension Motion, Epiq Application, Confidentiality Motion, Cash Management Motion, Escrow Motion, Wages Motion, Tax Motion, Utility Motion, Insurance Motion, OCP Motion, Cash Collateral Motion and Hearing Motion, to be delivered via electronic mail to those parties listed on the annexed Exhibit I, on November 5, 2019,
- x. Utility Motion, to be delivered via electronic mail to the following party: *customerservice5190@wcnx.org*, on November 5, 2019,
- xi. Declaration, Commencement Notice and Agenda, to be enclosed securely in separate postage pre-paid envelopes and delivered via overnight mail to those parties listed on the annexed Exhibit J, on November 6, 2019,
- xii. Commencement Notice and Agenda, to be enclosed securely in separate postage pre-paid envelopes and delivered via overnight mail to those parties listed on the annexed Exhibits B-H, on November 6, 2019,
- xiii. Declaration, Commencement Notice and Agenda, to be delivered via electronic mail to those parties listed on the annexed Exhibit K, on November 6, 2019,
- xiv. Commencement Notice and Agenda, to be delivered via electronic mail to the following party: *customerservice5190@wcnx.org*, on November 6, 2019, and
- xv. Commencement Notice and Agenda, to be delivered via facsimile to those parties listed on the annexed Exhibit L, on November 6, 2019.

3. All envelopes utilized in the service of the foregoing contained the following legend:
“LEGAL DOCUMENTS ENCLOSED. PLEASE DIRECT TO THE ATTENTION OF
ADDRESSEE, PRESIDENT OR LEGAL DEPARTMENT.”

/s/ Wing Chan

Wing Chan

Sworn to before me this
6th day of November, 2019

/s/ John Chau

Notary Public, State of New York

No. 01CH6353383

Qualified in Queens County

Commission Expires January 23, 2021

EXHIBIT A

Claim Name	Address Information
INTERNAL REVENUE SERVICE	SPECIAL PROCEDURES INSOLVENCY PO BOX 7346 PHILADELPHIA PA 19101-7346
INTERNAL REVENUE SERVICE	DEPARTMENT OF TREASURY INTERNAL REVENUE SERVICE CENTER OGDEN UT 84201
MINTZ, LEVIN, COHN, FERRIS, GLOVSKY & POPEO, PC	DANIEL BLECK & CHARLES AZANO, ESQS. COUNSEL TO UMB BANK NA ONE FINANCIAL CENTER BOSTON MA 02111
OFFICE OF THE UNITED STATES TRUSTEE	ATTN: LISA LAMBERT, ESQ. EARLE CABELL FEDERAL BUILDING 1100 COMMERCE ROOM 976 DALLAS TX 75242
RESIDENT 100	ADDRESS REDACTED
RESIDENT 101	ADDRESS REDACTED
RESIDENT 108	ADDRESS REDACTED
RESIDENT 123	ADDRESS REDACTED
RESIDENT 131	ADDRESS REDACTED
RESIDENT 146	ADDRESS REDACTED
RESIDENT 153	ADDRESS REDACTED
RESIDENT 154	ADDRESS REDACTED
RESIDENT 157	ADDRESS REDACTED
RESIDENT 170	ADDRESS REDACTED
RESIDENT 172	ADDRESS REDACTED
RESIDENT 190	ADDRESS REDACTED
RESIDENT 193	ADDRESS REDACTED
RESIDENT 194	ADDRESS REDACTED
RESIDENT 199	ADDRESS REDACTED
RESIDENT 202	ADDRESS REDACTED
RESIDENT 25	ADDRESS REDACTED
RESIDENT 314	ADDRESS REDACTED
RESIDENT 315	ADDRESS REDACTED
RESIDENT 45	ADDRESS REDACTED
RESIDENT 7	ADDRESS REDACTED
RESIDENT 72	ADDRESS REDACTED
RESIDENT 81	ADDRESS REDACTED
STATE OF TEXAS ATTORNEY GENERAL	ATTN: KEN PAXTON 300 W 15TH ST AUSTIN TX 78701
STATE OF TEXAS ATTORNEY GENERAL	ATTN: KEN PAXTON PO BOX 12548 AUSTIN TX 78711-2548
TEXAS DEPARTMENT OF INSURANCE	333 GUADALUPE AUSTIN TX 78701
TEXAS DEPARTMENT OF INSURANCE	PO BOX 149104 AUSTIN TX 78714-9104
TEXAS DEPT OF STATE HEALTH SERVICES	PO BOX 149347 AUSTIN TX 78714-9347
TEXAS DEPT OF STATE HEALTH SERVICES	1100 WEST 49TH ST AUSTIN TX 78756-3199
TEXAS SECRETARY OF STATE	ATTN: RUTH R HUGHS 1019 BRAZOS ST AUSTIN TX 78701

Total Creditor count 34

EXHIBIT B

SERVICE LIST

Claim Name	Address Information
BANK OF AMERICA, N.A.	135 SOUTH LASALLE CHICAGO IL 60603
BANKER'S TRUST	453 7TH ST DES MOINES IA 50309
FROST BANK	640 TAYLOR ST FORT WORTH TX 76102
REGIONS BANK	5500 BALTIMORE AVE HYATTSVILLE MD 20781
UMB BANK, N.A.	1010 GRAND BOULEVARD KANSAS CITY MO 64106

Total Creditor count 5

EXHIBIT C

SERVICE LIST

Claim Name	Address Information
REGIONS BANK	5500 BALTIMORE AVE HYATTSVILLE MD 20781
REGIONS BANK	CORPORATE TRUST OPERATIONS 250 RIVERCHASE PKWY EAST, 5TH HOOVER AL 35244
REGIONS BANK	1717 ST. JAMES PL. STE. 500 HOUSTON TX 77056

Total Creditor count 3

EXHIBIT D

SERVICE LIST

Claim Name	Address Information
AUTOMATIC DATA PROCESSING	2735 N STEMMONS FREEWAY DALLAS TX 75207
UNITED HEALTHCARE	1311 W PRESIDENT GEORGE BUSH HWY RICHARDSON TX 75080

Total Creditor count 2

EXHIBIT E

SERVICE LIST

Claim Name	Address Information
TARRANT COUNTY TAX OFFICE	100 E WEATHERFORD FORTH WORTH TX 76196
TEXAS COMPTROLLER OF PUBLIC ACCOUNTS	REVENUE ACCOUNTING DIVISION-BANKRUPTCY P.O. BOX 13528 AUSTIN TX 78711

Total Creditor count 2

EXHIBIT F

SERVICE LIST

Claim Name	Address Information
AT&T	PO BOX 5001 CAROL SPRINGS IL 60197
AT&T	208 S AKARD ST DALLAS TX 75202
AT&T MOBILITY	PO BOX 6463 CAROL SPRINGS IL 60197
AT&T MOBILITY	208 S AKARD ST DALLAS TX 75202
ATMOS ENERGY	1005 CONVENTION PLAZA ST LOUIS MO 63101
ATMOS ENERGY	PO BOX 790311 ST LOUIS MO 63179
CHARTER COMMUNICATIONS	12405 POWERSOURT DR ST LOUIS MO 63131
CHARTER COMMUNICATIONS	PO BOX 790261 ST LOUIS MO 63179
CITY OF FORT WORTH	PO BOX 870 FT WORTH TX 76101
CITY OF FORT WORTH	200 TEXAS ST FT WORTH TX 76102
LEVEL 3 COMMUNICATIONS	100 CENTURYLINK DR MONROE LA 71203
LEVEL 3 COMMUNICATIONS	PO BOX 910182 DENVER CO 80291
LOGIX COMMUNICATIONS	PO BOX 734120 DALLAS TX 75373
LOGIX COMMUNICATIONS	2950 NORTH LOOP WEST HOUSTON TX 77092
RELIANT ENERGY SERVICES	1501 NORTH PLANO RD HOUSTON TX 75081
RELIANT ENERGY SERVICES	PO BOX 1532 HOUSTON TX 77251
SOUTHWASTE DISPOSAL, LLC	525 S 6TH AVE MANSFIELD TX 76063
WASTE CONNECTIONS	4001 OLD DENTON RD HALTOM CITY TX 76117
WASTE CONNECTIONS	PO BOX 162479 FT WORTH TX 76161

Total Creditor count 19

EXHIBIT G

SERVICE LIST

Claim Name	Address Information
ACCIDENT FUND INSURANCE CO.	200 N GRAND AVE. LANSING MI 48933
AIG	175 WATER ST NEW YORK NY 10038
ARGONAUT INSURANCE COMPANY	175 E HOUSTON ST SUITE 1300 SAN ANTONIO TX 78205
BEAZLEY	15305 DALLAS PARKWAY SUITE 1060 ADDISON TX 75001
C.N.A. CONTINENTAL CASUALTY COMPANY	700 N PEARL ST DALLAS TX 75201
CARING COMMUNITIES	1850 W WINCHESTER RD #109 LIBERTYVILLE IL 60048
SENTRY INSURANCE	1800 NORTH POINT DR STEVENS POINT WI 54481
TDC SPECIALTY UNDERWRITERS	29 MILL ST UNIONVILLE CT 06085

Total Creditor count 8

EXHIBIT H

SERVICE LIST

Claim Name	Address Information
HEWLETT-PACKARD FINANCIAL SERVICES CO	200 CONNELL DRIVE SUITE 5000 BERKELEY HEIGHTS NJ 07922
U.S. BANK EQUIPMENT FINANCE	13010 SW 68TH PKWY 100 PORTLAND OR 97223

Total Creditor count 2

EXHIBIT I

TARRANT COUNTY SENIOR LIVING CENTER, INC. – CASE NO. 19-33759 (SGJ)

Electronic Mail Master Service List

NAME	ATTN	EMAIL
MINTZ, LEVIN, COHN, FERRIS, GLOVSKY & POPEO, PC	DANIEL BLECK & CHARLES AZANO, ESQS.	dbleck@mintz.com; cwazano@mintz.com
TEXAS SECRETARY OF STATE	ATTN: RUTH R HUGHS	secretary@sos.texas.gov

EXHIBIT J

SERVICE LIST

Claim Name	Address Information
INTERNAL REVENUE SERVICE	SPECIAL PROCEDURES INSOLVENCY PO BOX 7346 PHILADELPHIA PA 19101-7346
INTERNAL REVENUE SERVICE	DEPARTMENT OF TREASURY INTERNAL REVENUE SERVICE CENTER OGDEN UT 84201
LINEBARGER GOGGAN BLAIR & SAMPSON, LLP	COUNSEL TO TARRANT COUNTY ATTN: LAURIE A. SPINDLER, ESQ. 2777 N STEMMONS FREEWAY SUITE 1000 DALLAS TX 75207
MINTZ, LEVIN, COHN, FERRIS, GLOVSKY & POPEO, PC	DANIEL BLECK & CHARLES AZANO, ESQS. COUNSEL TO UMB BANK NA ONE FINANCIAL CENTER BOSTON MA 02111
OFFICE OF THE UNITED STATES TRUSTEE	ATTN: LISA LAMBERT, ESQ. EARLE CABELL FEDERAL BUILDING 1100 COMMERCE ROOM 976 DALLAS TX 75242
RESIDENT 100	ADDRESS REDACTED
RESIDENT 101	ADDRESS REDACTED
RESIDENT 108	ADDRESS REDACTED
RESIDENT 123	ADDRESS REDACTED
RESIDENT 131	ADDRESS REDACTED
RESIDENT 146	ADDRESS REDACTED
RESIDENT 153	ADDRESS REDACTED
RESIDENT 154	ADDRESS REDACTED
RESIDENT 157	ADDRESS REDACTED
RESIDENT 170	ADDRESS REDACTED
RESIDENT 172	ADDRESS REDACTED
RESIDENT 190	ADDRESS REDACTED
RESIDENT 193	ADDRESS REDACTED
RESIDENT 194	ADDRESS REDACTED
RESIDENT 199	ADDRESS REDACTED
RESIDENT 202	ADDRESS REDACTED
RESIDENT 25	ADDRESS REDACTED
RESIDENT 314	ADDRESS REDACTED
RESIDENT 315	ADDRESS REDACTED
RESIDENT 45	ADDRESS REDACTED
RESIDENT 7	ADDRESS REDACTED
RESIDENT 72	ADDRESS REDACTED
RESIDENT 81	ADDRESS REDACTED
STATE OF TEXAS ATTORNEY GENERAL	ATTN: KEN PAXTON 300 W 15TH ST AUSTIN TX 78701
STATE OF TEXAS ATTORNEY GENERAL	ATTN: KEN PAXTON PO BOX 12548 AUSTIN TX 78711-2548
TEXAS DEPARTMENT OF INSURANCE	333 GUADALUPE AUSTIN TX 78701
TEXAS DEPARTMENT OF INSURANCE	PO BOX 149104 AUSTIN TX 78714-9104
TEXAS DEPT OF STATE HEALTH SERVICES	PO BOX 149347 AUSTIN TX 78714-9347
TEXAS DEPT OF STATE HEALTH SERVICES	1100 WEST 49TH ST AUSTIN TX 78756-3199
TEXAS SECRETARY OF STATE	ATTN: RUTH R HUGHS 1019 BRAZOS ST AUSTIN TX 78701

Total Creditor count 35

EXHIBIT K

TARRANT COUNTY SENIOR LIVING CENTER, INC. – CASE NO. 19-33759 (SGJ)

Electronic Mail Master Service List

NAME	ATTN	EMAIL
MINTZ, LEVIN, COHN, FERRIS, GLOVSKY & POPEO, PC	DANIEL BLECK & CHARLES AZANO, ESQS.	dbleck@mintz.com; cwazano@mintz.com
TEXAS SECRETARY OF STATE	ATTN: RUTH R HUGHS	secretary@sos.texas.gov
LINEBARGER GOGGAN BLAIR & SAMPSON, LLC	ATTN: LAURIE A. SPINDLER, ESQ.	dallas.bankruptcy@publicans.com

EXHIBIT L

TARRANT COUNTY SENIOR LIVING CENTER, INC. – CASE NO. 19-33759 (SGJ)

Facsimile Master Service List

NAME	FAX
OFFICE OF THE UNITED STATES TRUSTEE	214-767-8971
TEXAS SECRETARY OF STATE	512-475-2761
STATE OF TEXAS ATTORNEY GENERAL	512-475-2994
STATE OF TEXAS ATTORNEY GENERAL	512-475-2994
LINEBARGER GOGGAN BLAIR & SAMPSON, LLP	469-221-5003

TARRANT COUNTY SENIOR LIVING CENTER, INC. – CASE NO. 19-33759 (SGJ)

Facsimile Banks Service List

NAME	FAX
Bank of America, N.A.	312-706-0065

TARRANT COUNTY SENIOR LIVING CENTER, INC. – CASE NO. 19-33759 (SGJ)

Facsimile Insurance Service List

NAME	FAX
Sentry Insurance	800-514-7191

TARRANT COUNTY SENIOR LIVING CENTER, INC. – CASE NO. 19-33759 (SGJ)

Facsimile Utility Service List

NAME	FAX
RELIANT ENERGY SERVICES	713-488-4422