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*Co-Counsel to the Official Committee
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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	Chapter 11
	§	
Buckingham Senior Living Community, Inc.,	§	Case No. 25-80595 (MVL)
	§	
Debtor.	§	Related to Docket No. 218

**THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS' MOTION
FOR LEAVE TO FILE UNDER SEAL UNREDACTED EXHIBITS F THROUGH H TO
THE MOTION TO COMPEL PRODUCTION OF DOCUMENTS BY DEBTOR**

1. The Official Committee of Unsecured Creditors (the "Committee"), by and through its undersigned counsel, files this *Motion for Leave to File Under Seal Unredacted Exhibits F Through H to the Motion to Compel Production of Documents by Debtor* (the "Motion"), for entry of an order, substantially in the form attached hereto as **Exhibit A** (the "Proposed Order"), authorizing the Committee to file unredacted versions of certain exhibits attached to the *Emergency Motion of the Official Committee of Unsecured Creditors to Compel Production of Documents by Debtor* [Docket No. 218] (the "Motion to Compel"), pursuant to section 107(b) of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the "Bankruptcy Code"), Rule 9018

of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rule 9077-1 of the *Local Bankruptcy Rules of the United States Bankruptcy Court for the Northern District of Texas, revised as of February 6, 2023* (the “Local Bankruptcy Rules”). In further support of this Motion, the Committee respectfully represents as follows:

RELEVANT BACKGROUND

1. On November 17, 2025 (the “Petition Date”), the Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code in this case (the “Case”). Pursuant to sections 1107 and 1108 of the Bankruptcy Code, the Debtor continues to operate its businesses as debtor-in-possession. No trustee or examiner has been appointed in this Case.

2. On December 3, 2025, the United States Trustee appointed the Committee, which consists of the following members: (i) Thomas C. Ryan; (ii) Lee Adcock Hunnell; (iii) Thomas A. Willet, Trustee of the Prillaman Living Trust; (iv) Manuel Ariel Payan, Co-Executor of the Estate of Margaret Payan; and (v) Steven Dyer, for the Estate of Robert Dyer. *See Notice of Appointment of the Official Unsecured Creditors’ Committee* [Docket No. 102].

3. On December 5, 2025, the Committee selected Greenberg Traurig, LLP (“GT”) as proposed counsel.

4. On December 10, 2025, the Committee served *The Official Committee of Unsecured Creditors’ First Request for Production of Documents Directed to the Debtor* (the “First RFP”) on the Debtor under the Confidentiality Agreement effective December 11, 2025, entered into by the Debtor, the Committee, and its counsel, GT (the “Confidentiality Agreement”).

5. Discovery and document production are ongoing and continue to be governed by the Confidentiality Agreement. The parties are actively exchanging information, reviewing

responsive materials, and addressing issues related to scope and privilege to ensure compliance with the Confidentiality Agreement.

6. On January 20, 2026, the Committee filed the Motion to Compel [*see* Docket No. 218]. The Motion to Compel refers to Exhibits F through H.

RELIEF REQUESTED

7. The Committee seeks authority to file under seal the unredacted Exhibits F through H, which include description of minutes from the Board of Directors' special meetings and executive sessions (the "Confidential Exhibits"). Public filing of these materials, even in redacted form, would violate the Confidentiality Agreement between the Debtor, the Committee, and GT.

BASIS FOR RELIEF REQUESTED

8. Confidential information may be sealed by a bankruptcy court from the public record pursuant to section 107(b) of the Bankruptcy Code, which provides in relevant part that:

On request of a party in interest, the bankruptcy court shall, and on bankruptcy court's own motion, the bankruptcy court may . . . protect an entity with respect to . . . confidential research, development, or commercial information.

11 U.S.C. §107(b)(1).

9. Section 107(b) is implemented through Bankruptcy Rule 9018. In pertinent part, that rule provides:

On motion or on its own initiative, with or without notice, issue any order that justice requires to . . . protect the estate or any entity regarding a trade secret or other confidential research, development, or commercial information.

Bankruptcy Rule 9018.

10. Once the court determines that information falls within one of the categories enumerated in section 107(b) of the Bankruptcy Code, "the court is *required* to protect a requesting

interested party and has no discretion to deny the application.” *Video Software Dealers Ass’n v. Orion Pictures Corp. (In re Orion Pictures Corp.)*, 21 F.3d 24, 27 (2d Cir. 1994) (emphasis in original) (internal citation omitted).

11. The Confidential Exhibits contain highly sensitive, non-public information regarding internal deliberations of the Debtor’s Board that may be critical to understanding decisions impacting creditor recoveries. Public disclosure of these materials would breach the Confidentiality Agreement and risk harm to the Debtor’s estate and creditors by undermining ongoing negotiations and the value-preserving efforts of the restructuring process.

12. The Committee proposes filing the unredacted Confidential Exhibits under seal with the Court to protect the sensitive information contained therein. The Committee further requests that the sealed status of these Confidential Exhibits remain in effect unless and until the Court orders otherwise, thereby preserving the confidentiality of the Board’s deliberations and compliance with the Confidentiality Agreement.

WHEREFORE, the Committee requests that the Court enter an order granting leave to file under seal the unredacted the Confidential Exhibits and granting such other relief as the Court deems just and proper.

Dated: January 20, 2026

GREENBERG TRAURIG, LLP

/s/ Emily D. Nasir

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CERTIFICATE OF SERVICE

I hereby certify that on January 20, 2025, a true and correct copy of the foregoing pleading was served via CM/ECF to all parties authorized to receive electronic notice in this Case.

/s/ Emily D. Nasir
Emily D. Nasir

Exhibit A
Proposed Order

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

In re: § Chapter 11
§
Buckingham Senior Living Community, § Case No. 25-80595 (MVL)
Inc., §
§
Debtor. § **Related to Docket No. 218**

**ORDER GRANTING THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS' MOTION FOR LEAVE TO FILE UNDER SEAL
UNREDACTED EXHIBITS F THROUGH H TO THE MOTION TO
COMPEL PRODUCTION OF DOCUMENTS BY DEBTOR**

Unredacted copies of Exhibits F Through H may be shared with attorneys employed by the United States Trustee who are advised of and therefore subject to this Order.

This Order does not limit the use of Exhibits F Through H or the testimony related thereto in connection with any party's obligation to refer criminal or ethical violations.

The Court has reviewed the Motion filed by the Official Committee of Unsecured Creditors (the "Committee") for Leave to File Under Seal Unredacted Exhibits F through H in the above-styled Bankruptcy Case. The Motion is hereby **GRANTED**.

END OF ORDER

Prepared and presented by:

/s/ Emily D. Nasir
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