Jeffrey A. Marks, Esq. (pro hac vice pending) SQUIRE, SANDERS & DEMPSEY L.L.P. 221 East Fourth Street, Suite 2900

Cincinnati, OH 45202-4095 Phone: 513.361.1200 Facsimile: 513.361.1201

Nicholas J. Brannick, Esq. (pro hac vice pending) SQUIRE, SANDERS & DEMPSEY L.L.P. 41 South High St., Suite 2000 Columbus, OH 43215

Phone: 614.365.2700 Facsimile: 614.365.2499

COUNSEL FOR SOVEREIGN BANK

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

IN RE:	§	CASE NO. 09-37010
EDICECON DETIDEMENT COMMUNITIES	§	CHAPTER 11
ERICKSON RETIREMENT COMMUNITIES, LLC, et al. ¹	8 §	Jointly Administered
-,	§	
Debtors.	§	

NOTICE OF APPEARANCE, REQUEST FOR ALL NOTICES, AND DEMAND FOR SERVICE OF ALL PLEADINGS AND FILINGS

PLEASE TAKE NOTICE that, pursuant to 11 U.S.C. § 1109(b) and to Rule 9010(b) of the Federal Rules of Bankruptcy Procedure, the undersigned attorney hereby enters an appearance on behalf of Sovereign Bank ("Sovereign"). The undersigned attorney and law firm hereby requests copies of all notices and pleadings pursuant to Bankruptcy Rules 2002(a), (b) and (f) and 3018(a). All such notices should be addressed as follows:

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¹ The Debtors in these chapter 11 cases are Erickson Retirement Communities, LLC, Ashburn Campus, LLC, Columbus Campus, LP, Concord Campus GP, LLC, Concord Campus, LP, Dallas Campus GP, LLC, Dallas Campus, LP, Erickson Construction, LLC, Erickson Group, LLC, Houston Campus, LP, Kansas Campus, LLC, Littleton Campus, LLC, Novi Campus, LLC, Senior Campus Services, LLC, Warminster Campus GP, LLC, and Warminster Campus, LP.

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-and-

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PLEASE TAKE FURTHER NOTICE that the foregoing demand includes not only the

notices and papers referred to in the Bankruptcy Rules and provisions specified above, but also

includes, without limitation, notices of any application, motion, petition, pleading, request, order,

hearing, complaint or demand, whether formal or informal, whether written or oral and whether

transmitted or conveyed by mail, hand delivery, telephone, telegraph, telex or fax or otherwise,

filed with regard to the above case and proceedings therein.

PLEASE TAKE FURTHER NOTICE that the filing of this notice and request for

documents is not consent of Sovereign to the jurisdiction of the Bankruptcy Court for any

purpose or reason.

PLEASE TAKE FURTHER NOTICE that neither this notice nor any later appearance,

pleading, claim, or suit shall waive any right: (1) to have final orders in non-core matters entered

only after de novo review by a District Judge; (2) to trial by jury in any proceeding so triable in

this case or any case, controversy, or proceeding related to this case; or (3) to have the District

Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal.

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PLEASE TAKE FURTHER NOTICE that this Notice of Appearance, Request for All

Notices, and Demand for Service of All Pleadings and Filings is without prejudice to: (1) the

rights, remedies, claims, action, defenses, setoffs, or recoupment of Sovereign, in law or in

equity, against the Debtor(s) and any other entities either in these cases or in any action, all of

which rights, remedies, claims, actions, defenses, setoffs and recoupments are expressly reserved;

and (2) any objection which may be made to the jurisdiction of the Court, and shall not be

deemed or construed to submit Sovereign to the jurisdiction of the Court.

The undersigned additionally requests that the Debtor(s) and the Clerk of Court place the

foregoing name and address on any mailing matrix or list of parties-in-interest to be prepared or

existing in the above-numbered cause, including any Official Consolidated Short Service List.

DATE: October 27, 2009

Respectfully submitted,

By: /s/ Jeffrey A. Marks

Jeffrey A. Marks, Esq. Squire, Sanders & Dempsey L.L.P.

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CERTIFICATE OF SERVICE

I	cert	ify that on	October 2	27, 2009, a	true	copy of	the for	egoii	ng was	served	via	email
through	the	Bankruptcy	Court's	Electronic	Case	Filing	System	on	those	parties	that	have
consente	d to	such service	e, includir	ng the Debto	ors.							

By: /s/ Jeffrey A. Marks
Jeffrey A. Marks, Esq.