

Mark Elmore
State Bar No. 24036523
HAYNES AND BOONE, LLP
2323 Victory Avenue, Suite 700
Dallas, Texas 75219
Telephone: 214.651.5000
Facsimile: 214.651.5940

Colin T. Darke (*Pro hac vice* pending)
Bodman LLP
6th Floor at Ford Field
1901 S. Antoine Street
Detroit, MI 48226
Telephone: 313.393.7585
Facsimile: 313.393.7579

ATTORNEYS FOR FORD ESTATES, INC.

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

In re:

ERICKSON RETIREMENT
COMMUNITIES, LLC., *et al.*

Debtors.

Chapter 11

Case No.: 09-37010-SGJ-11

Jointly Administered

**NOTICE OF APPEARANCE AND
REQUEST FOR NOTICES AND PAPERS**

PLEASE TAKE NOTICE that Ford Estates, Inc. (“Ford Estates”) files this Notice of Appearance and Request for Notices and Papers pursuant to Section 1109(b) of the Bankruptcy Code and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and requests, pursuant to Bankruptcy Rules 2002, 3017 and 9007 and Sections 342 and 1109(b) of the Bankruptcy Code, that copies of all notices and pleadings given or filed in these bankruptcy cases be given and served on Ford Estates by serving:

Colin T. Darke (*Pro hac vice* pending)
Bodman LLP
6th Floor at Ford Field
1901 S. Antoine Street
Detroit, MI 48226
Telephone: 313.393.7585
Facsimile: 313.393.7579
Email: cdarke@bodmanllp.com

and

Mark Elmore
Haynes and Boone, LLP
2323 Victory Avenue, Suite 700
Dallas, Texas 75219
Telephone: 214.651.5000
Facsimile: 214.651.5940
Email: mark.elmore@haynesboone.com

Please take further notice that the foregoing request includes not only the notices and papers referred to in the Bankruptcy Rules, but also includes, without limitation, any notice, application, complaint, demand, motion, petition, pleading or request, whether formal or informal, written or oral, and whether transmitted or conveyed by mail, messenger delivery, telephone, facsimile, telegraph, telex or otherwise filed or made with regard to the referenced cases and proceedings herein.

This Notice of Appearance and Request for Notices and Papers shall not be deemed or construed to be a waiver of the rights of Ford Estates (i) to have final orders in noncore matters entered only after de novo review by a district judge, (ii) to trial by jury in any proceeding so triable in these cases or any case, controversy, or proceeding related to these cases, (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) to assert or exercise any other rights, claims, actions, setoffs, or recoupments to which Ford Estates is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: October 27, 2009.

HAYNES AND BOONE, LLP

By: /s/ Mark Elmore

Mark Elmore

State Bar No. 24036523

2323 Victory Avenue, Suite 700

Dallas, Texas 75219

Telephone: 214.651.5000

Facsimile: 214.651.5940

and

Colin T. Darke (*Pro hac vice* pending)

Bodman LLP

6th Floor at Ford Field

1901 S. Antoine Street

Detroit, MI 48226

Telephone: 313.393.7585

Facsimile: 313.393.7579

ATTORNEYS FOR FORD ESTATES, INC.

CERTIFICATE OF SERVICE

I hereby certify that on October 27, 2009, a true and correct copy of the foregoing document was served (i) via e-mail or United States first class mail, postage prepaid (as indicated) on the parties listed below; and (ii) via e-mail on the parties who receive electronic notice in this case pursuant to the Court's ECF filing system:

Vincent P. Slusher
DLA Piper LLP (US)
1717 Main Street, Suite 4600
Dallas, TX 75201
Email: vince.slusher@dlapiper.com
via email

Thomas R. Califano
Jeremy R. Johnson
DLA Piper LLP (US)
1251 Avenue of the Americas
New York, NY 10020-1104
Email: thomas.califano@dlapiper.com
Email: jeremy.johnson@dlapiper.com
via email

Office of the United States Trustee
1100 Commerce Street
Room 976
Dallas, TX 75242
via first class mail

/s/ Mark Elmore
Mark Elmore