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Counsel For Garnet Valley School District  
and Concord Township, Pennsylvania

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

<b>IN RE:</b>	§	<b>CASE NO. 09-37010 (sgj)</b>
	§	
<b>ERICKSON RETIREMENT COMMUNITIES, LLC, et al.,</b>	§	<b>Chapter 11</b>
	§	
<b>Debtors.</b>	§	<b>(Jointly Administered)</b>
	§	

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF ALL PAPERS**

PLEASE TAKE NOTICE that the undersigned hereby appears as counsel for Garnet Valley School District and Concord Township, Pennsylvania (the “Pennsylvania Taxing Authorities”), secured creditors in the above captioned cases, and pursuant to Federal Rules of Bankruptcy Procedure 2002, 3017(a), 9007, 9010 and 11 U.S.C. § 1109(b), requests that copies of any and all notices, pleadings, motions, orders to show cause, applications, presentments, petitions, memoranda, affidavits, declarations, orders, disclosure statements and plans of reorganization, or other documents, filed or entered in this case, be transmitted to:

Louis R. Strubeck, Jr., Esq.  
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PLEASE TAKE FURTHER NOTICE that, in accordance with Federal Rule of Bankruptcy Procedure 3017(a), this request also constitutes a request in writing for copies of any and all disclosure statements or plans filed in these cases.

Neither this Request for Notice nor any subsequent appearances, pleadings, claims, proofs of claim, documents, suits, motions nor any other writings or conduct, shall constitute a waiver of the Pennsylvania Taxing Authorities’:

- a. right to have any and all final orders in any and all non-core matters entered only after *de novo* review by a United States District Court Judge;
- b. right to trial by jury in any proceeding as to any and all matters so triable herein, whether or not the same be designated legal or private right, or in any case, controversy or proceeding related hereto, notwithstanding the designation *vel non* of such matters as “core proceedings” pursuant to 28 U.S.C. Section 157(b)(2)(H), and whether or not such jury trial right is pursuant to statute or the United States Constitution;
- c. right to have the reference of this matter withdrawn by the United States District Court in any matter or proceeding subject to mandatory or discretionary withdrawal; and
- d. other rights, claims, actions, defenses, setoffs, recoupments or other matters to which the Pennsylvania Taxing Authorities are rightly entitled to under any agreements or at law or in equity or under the United States Constitution.

All of the above rights are expressly reserved and preserved unto the Pennsylvania Taxing Authorities without exception and with no purpose of confessing or conceding jurisdiction in any way by this filing or by any other participation in these matters.

Dated: Dallas, Texas  
April 14, 2010

FULBRIGHT & JAWORSKI L.L.P.

By: /s/ Kristian W. Gluck  
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Counsel For Garnet Valley School District  
and Concord Township, Pennsylvania

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 14, 2010, the electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of the attached document by electronic means.

/s/ Kristian W. Gluck

Kristian W. Gluck