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ATTORNEYS FOR THE DEBTORS
AND DEBTORS IN POSSESSION

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

In re:	§	Case No. 09-37010 (SGJ)
	§	
ERICKSON RETIREMENT COMMUNITIES, LLC, et al.¹	§	Chapter 11
	§	
Debtors.	§	(Jointly Administered)
	§	

**MOTION FOR EXPEDITED HEARING ON DEBTORS' AMENDED MOTION FOR AN
ORDER AUTHORIZING DEBTORS TO AMEND POSTPETITION FINANCING
PURSUANT TO 11 U.S.C. §§ 105, 361, 362, 363, AND 364
AND BANKRUPTCY RULE 4001**

The above-captioned debtors and debtors in possession (the “Debtors”) by their proposed attorneys, DLA Piper LLP (US), move (the “Motion”) this Court for entry of an order setting an expedited hearing on the following motion (the “DIP Motion”) filed on April 16, 2010:

¹ The Debtors in these chapter 11 cases are Erickson Retirement Communities, LLC, Ashburn Campus, LLC, Columbus Campus, LLC, 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, Warminster Campus, LP.

DEBTORS' AMENDED MOTION FOR AN ORDER AUTHORIZING DEBTORS TO AMEND POSTPETITION FINANCING PURSUANT TO 11 U.S.C. §§ 105, 361,362, 363, AND 364 AND BANKRUPTCY RULE 4001

In support of this Motion, the Debtors respectfully represent as follows:

Jurisdiction and Venue

1. The Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the General Order Regarding Procedures for Complex Chapter 11 Cases issued by the United States Bankruptcy Court for the Northern District of Texas on January 13, 2006. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

2. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.

3. The statutory basis for the relief requested herein is section 105(a) of title 11 of the United States Code (the "Bankruptcy Code").

Background

4. On October 19, 2009 (the "Petition Date"), the Debtors commenced these cases by each filing voluntary petitions for relief under chapter 11 of the Bankruptcy Code.

5. The Debtors remain in possession of their assets and continue to operate and manage their businesses as debtors in possession pursuant to Bankruptcy Code sections 1107 and 1108.

6. On November 2, 2009, the Office of the United States Trustee appointed a committee of unsecured creditors (the "Committee") in these cases.

7. No trustee or examiner has been appointed in these cases.

8. On or about April 15, 2010, the Court approved the Debtors' Fourth Amended Joint Plan of Reorganization under Chapter 11 of the Bankruptcy Code (the "Plan").

Relief Requested

9. By this Motion, the Debtors seek an order setting a hearing on the DIP Motion the

week of April 19, 2010. The DIP Motion seeks the entry of an order (i) authorizing the Debtors to enter into an amendment pursuant to sections 105, 361, 362, 363, and 364 of title 11 of the Bankruptcy Code and Bankruptcy Rule 4001; and (ii) approving a reasonable extension fee in the amount of \$25,000.00. Such amendment and extension to the Debtors' financing would allow the Debtors fulfill their obligations under Plan while maintaining the value of their estates. The continuation of Debtors' funding is necessary for the Debtors' successful reorganization, and thus, an emergency hearing is required for the DIP Motion.

Notice

10. Notice of this Motion has been provided to (i) the United States Trustee for the Northern District of Texas; (ii) counsel to the creditors' committee; (iii) counsel to the DIP Lender; (iv) counsel to the prepetition secured lenders; and (iv) any known lienholders whose liens are being primed under the DIP Financing. The Debtors submit that, in light of the nature of the relief requested, no other or further notice is necessary or required.

WHEREFORE, the Debtors respectfully request that the Court enter an order granting (i) the relief requested herein, and (ii) such other and further relief to the Debtors as the Court may deem proper.

Date: April 16, 2010
Dallas, Texas

Respectfully submitted,

By: /s/ Vincent P. Slusher
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Exhibit A

Proposed Order

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

In re:	§	Case No. 09-37010 (SGJ)
	§	
ERICKSON RETIREMENT COMMUNITIES, LLC, <i>et al.</i>¹	§	Chapter 11
	§	
Debtors.	§	(Jointly Administered)
	§	

**ORDER REGARDING MOTION FOR EXPEDITED HEARING ON DEBTORS'
AMENDED MOTION FOR AN ORDER AUTHORIZING DEBTORS TO AMEND
POSTPETITION FINANCING PURSUANT TO 11 U.S.C. §§ 105, 361,362, 363, AND 364
AND BANKRUPTCY RULE 4001**

The Debtors' request for emergency hearing on the following motion:

DEBTORS' AMENDED MOTION FOR AN ORDER AUTHORIZING DEBTORS TO AMEND POSTPETITION FINANCING PURSUANT TO 11 U.S.C. §§ 105, 361,362, 363, AND 364 AND BANKRUPTCY RULE 4001

is GRANTED/DENIED.

A hearing will be held at _____ on _____ at _____m. Counsel for Debtor shall serve this order on interested parties.

_____ No emergency hearing will be scheduled.

End Of Order

¹ The Debtors in these chapter 11 cases are Erickson Retirement Communities, LLC, Ashburn Campus, LLC, Columbus Campus, LLC, 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, Warminster Campus, LP.