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PROPOSED ATTORNEYS FOR THE DEBTORS  
AND DEBTORS IN POSSESSION

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

<b>In re:</b>	§	<b>CASE NO. 09-37010</b>
	§	
<b>ERICKSON RETIREMENT COMMUNITIES, LLC, <i>et al.</i><sup>1</sup></b>	§	<b>CHAPTER 11</b>
	§	
<b>Debtors.</b>	§	<b>Joint Administration Pending</b>
	§	

**REQUEST FOR EMERGENCY CONSIDERATION  
OF CERTAIN “FIRST DAY” MATTERS**

On October 19, 2009, Erickson Retirement Communities, LLC and its affiliated debtors (the “Debtors”) each filed a petition for relief under Chapter 11 of the Bankruptcy Code. Counsel for the Debtors believe that these cases qualify as complex Chapter 11 cases. The Debtors need emergency consideration of the following initial case matters:

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<sup>1</sup>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

- \_\_\_ MOTION FOR JOINT ADMINISTRATION
- \_\_\_ MOTION FOR ORDER EXTENDING TIME TO FILE SCHEDULES AND STATEMENTS OF FINANCIAL AFFAIRS
- \_\_\_ MOTION REGARDING MAINTENANCE OF BANK ACCOUNTS AND EXISTING CASH MANAGEMENT SYSTEM
- \_\_\_ MOTION PURSUANT TO 11 U.S.C. §§ 105(a) AND 363(b) FOR AN ORDER AUTHORIZING PAYMENT OF PREPETITION (I) WAGES, SALARIES AND OTHER COMPENSATION OF EMPLOYEES, (II) EMPLOYEE MEDICAL AND SIMILAR BENEFITS, (III) REIMBURSABLE EMPLOYEE EXPENSES, AND (IV) OTHER MISCELLANEOUS EMPLOYEE EXPENSES AND BENEFITS
- \_\_\_ MOTION FOR ENTRY OF INTERIM ORDER AUTHORIZING USE OF CASH COLLATERAL
- \_\_\_ MOTION FOR INTERIM AND FINAL ORDERS (I) PROHIBITING UTILITIES FROM ALTERING, REFUSING OR DISCONTINUING SERVICE, (II) DEEMING THE UTILITY COMPANIES ADEQUATELY ASSURED OF FUTURE PERFORMANCE; (III) AUTHORIZING THE DEBTORS TO MAINTAIN THEIR PREPETITION RELATIONSHIPS AND PRACTICES WITH THE THIRD PARTY VENDOR; AND (IV) ESTABLISHING PROCEDURES FOR DETERMINING REQUESTS FOR ADDITIONAL ADEQUATE ASSURANCE
- \_\_\_ MOTION TO ESTABLISH INTERIM NOTICE PROCEDURES
- \_\_\_ MOTION FOR ORDER APPROVING RETENTION OF CLAIMS AND NOTICING AGENT
- \_\_\_ NOTICE OF DESIGNATION AS COMPLEX CHAPTER 11 BANKRUPTCY CASE
- \_\_\_ OTHERS

Dated: October 19, 2009  
Dallas, Texas

Respectfully submitted,

DLA Piper LLP (US)

By: /s/ Vincent P. Slusher  
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Proposed Attorneys for Debtors and Debtors in  
Possession

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the foregoing document has been served this 20th day of October 2009 to the Debtors' thirty largest unsecured creditors, the Debtors' secured creditors, and the United States Trustee by either overnight mail, e-mail, or facsimile.

*/s/Vincent P. Slusher*

Vincent P. Slusher