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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**

<b>In re:</b>	§	<b>CASE NO. 09-37010 (SGJ)</b>
	§	
<b>ERICKSON RETIREMENT COMMUNITIES, LLC, <i>et al.</i></b> <sup>1</sup>	§	<b>CHAPTER 11</b>
	§	<b>Jointly Administered</b>
	§	
<b>Debtors.</b>		

**MOTION TO CONTINUE HEARING**

The Debtors and Debtors in Possession herein (collectively, the “Debtors”), by their undersigned counsel, hereby file this motion (the “Motion”) to continue the hearings set for June

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<sup>1</sup> 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.

3, 2010 relating to the Debtors' Amended Motion for Determination of Tax Liability [Dkt. No. 1287] (the "Tax Motion") and the Tax Applications described below, and respectfully state as follows:

1. 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.

2. 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.

3. On November 2, 2009, the Office of the United States Trustee appointed a committee of unsecured creditors in these cases. No trustee or examiner has been appointed.

4. On April 9, 2010, the Debtors filed the Tax Motion. A hearing on the Tax Motion is set for June 3, 2010 at 9:30 a.m.

5. Johnson, Douglas, and Loudoun Counties have filed Applications for Administrative Expenses [Dkt. Nos. 1401, 1433 & 1434] (collectively the "Tax Applications") related to the taxes disputed in the Tax Motion, and a hearing on such applications is also set for June 3, 2010.

6. The Debtors and the local taxing authorities are working towards a resolution of the Debtors' objections raised and the relief sought in the Tax Motion and the related Tax Applications regarding to the valuations of the Debtors' properties and the applicable taxes. The Debtors feel that some or all of the issues raised in the Tax Motion and Tax Applications may be resolved without adjudication by the Court. Therefore, the Debtors request that the hearing on the Tax Motion and Tax Applications be continued and reset for June 29, 2010 at 1:30 p.m. Moreover, Debtor has contacted each of the parties to the Tax Motion including the parties that

filed the Tax Applications, notifying them of the proposed continuance, and all parties agreed and consented to the relief requested herein.

7. The Debtors also request that the Court set the uniform response date to the Tax Motion and Tax Applications as June 18, 2010.

WHEREFORE, PREMISES CONSIDERED, the Debtors request that this Court (i) grant the relief requested in the Motion, (ii) continue the hearing on the Tax Motion and Tax Applications to June 29, 2010 at 1:30 p.m., (iii) continue the hearing on the Tax Applications to June 29, 2010 at 1:30 p.m., (iv) set the uniform response date to the Tax Motion as June 18, 2010.; (v) set the uniform response date to the Tax Applications as June 18, 2010.; and (vi) grant the Debtors such other and further relief, both at law and in equity, which is just and proper.

Date: May 28, 2010

Dallas, Texas

Respectfully submitted,

By: /s/ Vincent P. Slusher  
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ATTORNEYS FOR THE DEBTORS  
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**EXHIBIT A**  
**PROPOSED ORDER**

**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</b>	§	<b>CHAPTER 11</b>
<b>COMMUNITIES, LLC, <i>et al.</i></b> <sup>2</sup>	§	<b>Jointly Administered</b>
	§	
<b>Debtors.</b>		

**ORDER GRANTING MOTION TO CONTINUE HEARING**

Came on for consideration the Motion to Continue Hearing (the “Motion”), filed by the Debtors and Debtors in Possession, seeking an order (i) continuing the hearing set for June 3, 2010 on the Debtors’ Amended Motion for Determination of Tax Liability [Dkt. No. 1287] (the “Tax Motion”) until June 29, 2010 at 1:30 p.m.; (ii) continuing the hearing set for June

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<sup>2</sup> 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.

3, 2010 on the Applications for Administrative Expenses [Dkt. Nos. 1401, 1433 & 1434] (collectively the “Tax Applications”) until June 29, 2010 at 1:30 p.m.; (iii) setting the uniform response date to the Tax Motion as June 18, 2010; and (iv) setting the uniform response date to the Tax Applications as June 18, 2010. Having considered the Motion, and sufficient cause appearing therefore,

IT IS ORDERED, that the Motion is hereby granted; and it is further

ORDERED, that the hearing on the Tax Motion is continued to June 29, 2010 at 1:30 p.m. CDT; and it is further

ORDERED, that the uniform response date to the Tax Motion is June 18, 2010; and it is further

ORDERED, that the hearing on the Tax Applications is continued to June 29, 2010 at 1:30 p.m. CDT; and it is further

ORDERED, that the uniform response date to the Tax Applications is June 18, 2010.

### End of Order ###