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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**

| | | |
|---|---|-------------------------------------|
| In re: | § | CASE NO. 09-37010 |
| | § | |
| ERICKSON RETIREMENT COMMUNITIES, LLC, et al.¹ | § | CHAPTER 11 |
| | § | |
| | § | Joint Administration Pending |
| | § | |
| Debtors. | | |

APPLICATION FOR ADMISSION *PRO HAC VICE* OF MICHAEL D. HYNES

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

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.

The undersigned (the “Applicant”) moves for admission to appear *pro hac vice* as attorney for the above captioned debtors and debtors in possession (the “Debtors”).

The Applicant respectfully certifies as follows:

1. Applicant is a partner at the law firm of DLA Piper LLP (US), 1251 Avenue of the Americas, New York, New York 10020.

2. Applicant will sign all pleadings with the name Michael D. Hynes.

3. DLA Piper has been retained, pending the Court’s approval, to provide legal representation to Erickson Retirement Communities, LLC, and its affiliated-debtors in the above-referenced chapter 11 cases.

4. Applicant was admitted in New Jersey in 2000 and is presently in good standing of the bar of the highest court of the State of New Jersey and was issued the bar license number of 85557.

5. Applicant was admitted in New York in 2000 and is presently in good standing of the bar of the highest court of the State of New York and was issued the bar license number of 547837.

5. Applicant also has been admitted to practice before the following courts:

- a. Southern District of New York;
- b. Eastern District of New York; and
- c. District of New Jersey.

6. Applicant is a member in good standing of the bars of the courts listed above.

7. Applicant has never been subject to a grievance proceeding or involuntary removal proceeding while a member of the bar of any state or federal court.

8. Applicant pled guilty to DUI in New Jersey in or about 1994 and complied with the court's directives. Applicant duly disclosed that event to the bars of New York and New

Jersey prior to admission thereto. Applicant has no other charges, arrests, or convictions of a criminal offense or offenses.

9. Applicant has not filed *pro hac vice* applications in the past three (3) years in the United States Bankruptcy Court, Northern District of Texas.

10. Applicant has read *Dondi Properties Corp v. Savs. & Loan Ass'n*, 121 F.R.D. 284 (N.D.Tex. 1988) (*en banc*), and the local civil and bankruptcy rules of this court and will comply with the standards of practice adopted in *Dondi* and with the local civil and bankruptcy rules.

11. Applicant respectfully requests to be admitted to practice in the United States Bankruptcy Court, Northern District of Texas, for these chapter 11 cases.

12. Applicant has served a true and correct copy of this document upon each attorney of record and has filed the application via ECF with the payment of \$25.00.

Dated: October 28, 2009
Dallas, Texas

DLA PIPER LLP (US)

By: /s/ Michael D. Hynes
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Proposed Attorneys for the Debtors and
Debtors in Possession

Presented by:

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ORDER GRANTING APPLICATION FOR ADMISSION *PRO HAC VICE*

Upon consideration of the Application for Admission *Pro Hac Vice* filed by Michael D. Hynes, it is hereby

ORDERED that the Application is GRANTED; and it is further

ORDERED that Michael D. Hynes is admitted to appear *pro hac vice* before this court for the purpose of representing Erickson Retirement Communities, LLC and its affiliated debtors in the above-referenced chapter 11 cases; and it is further

ORDERED that this Order shall not be considered admission to practice generally before this Court or the United States District Court for the Northern District of Texas.

###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.