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ATTORNEYS FOR THE DEBTORS
AND DEBTORS IN POSSESSION

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

MOTION TO CONTINUE HEARING

DLA Piper LLP (US) ("DLA Piper"), counsel to the above-captioned debtors and debtors in possession (the "Debtors"), hereby files this motion (the "Motion") to continue the hearing set for July 15, 2010 at 9:30 a.m. to July 15, 2010 at 2:30 p.m. on (a) the First Interim Fee

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,

Application of Bracewell & Giuliani LLP, Counsel to the Official Committee of Unsecured Creditors, for Compensation and Reimbursement of Expenses for the Period November 2, 2009 Through March 31, 2010 (the “B&G Application”) [Dkt. No. 1421] and (b) the First and Final Fee Application of Protiviti Inc. for Allowance of Compensation and Reimbursement of Expenses as Financial Advisors for the Official Committee of Unsecured Creditors for the Period Nunc Pro Tunc from November 4, 2009 Through March 31, 2010 (the “Protiviti Application”) [Dkt. No. 1422], and respectfully states as follows:

Background

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 remained in possession of their assets and continued to operate and manage their businesses as debtors in possession during the bankruptcy proceedings 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 30, 2010, Bracewell & Giuliani LLP filed the B&G Application. A hearing thereon is scheduled for July 15, 2010 at 9:30 a.m. Also on April 30, 2010, Protiviti Inc. filed the Protiviti Application. A hearing thereon is also scheduled for July 15, 2010 at 9:30 a.m.
5. DLA Piper will shortly file its final application for compensation and reimbursement of expenses, as counsel to the Debtors (the “DLA Application”). DLA Piper has requested that the DLA Application be heard on July 15, 2010 at 2:30 p.m. It is expected that Alvarez & Marsal Healthcare Industry Group LLC (“A&M”) will also shortly file its first and

Kansas Campus, LLC, Littleton Campus, LLC, Novi Campus, LLC, Senior Campus Services, LLC, Warminster Campus GP, LLC, Warminster Campus, LP.

final application for compensation and reimbursement of expenses (the "A&M Application"). The hearing date of July 15, 2010 is also agreeable to A&M. However, because professionals will be flying into Dallas from other locations to attend the hearing, it is requested that the hearing be scheduled for 2:30 p.m. on that day, rather than 9:30 a.m.

6. Counsel for the Debtors have contacted Bracewell & Giuliani and Protiviti on this matter. Bracewell & Giuliani has consented to the relief requested herein. Counsel has not yet heard back from Protiviti. However, in view of the convenience that a later hearing time offers to all concerned, counsel submits that it is likely that Protiviti, upon being contacted, will consent as well.

WHEREFORE, PREMISES CONSIDERED, the Debtors request that this Court (i) continue the hearing on the B&G Application and the Protiviti Application to July 15, 2010 at 2:30 p.m. and (ii) grant the Debtors such other and further relief, both at law and in equity, which is just and proper.

Date: June 10, 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, et al.¹	§	Chapter 11
	§	
Debtors.	§	(Jointly Administered)
	§	

ORDER GRANTING MOTION TO CONTINUE HEARING

Came on for consideration the Motion to Continue Hearing (the “Motion”), filed by DLA Piper LLP (US) (“DLA Piper”), counsel to the above-captioned debtors and debtors in possession (the “Debtors”), seeking an order continuing the hearing set for July 15, 2010 on the B&G Application [Dkt No. 1421] and the Protiviti Application [Dkt. No. 1422], both as defined

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in the Motion, until July 15, 2010 at 2:30 p.m. 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 B&G Application and the Protiviti Application is continued to July 15, 2010 at 2:30 p.m.

End of Order