

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

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

**ANNE ARUNDEL COUNTY, MARYLAND'S
MOTION FOR LEAVE OF COURT TO PROCEED WITHOUT
LOCAL COUNSEL**

Anne Arundel County, Maryland ("Anne Arundel County"), by and through its counsel, Hamilton F. Tyler, files this Motion for Leave of Court to Proceed Without Local Counsel and for cause states as follows:

- Undersigned counsel has filed an Application for Admission Pro Hoc Vice in this case. Counsel's appearance is being entered solely to seek to compel Debtors to pay Anne Arundel County, Maryland's claim for secured taxes. Anne Arundel County is a governmental entity within the State of Maryland.
- Undersigned counsel has prepared a Motion for Order Requiring Debtors to pay the allowed amount of Anne Arundel County, Maryland's secured claim against Erickson Retirement Communities, LLC, out of estate assets.
- Anne Arundel County, Maryland's budget is extremely tight due to economic circumstances. Anne Arundel County, Maryland does not wish to incur expenses in retaining local counsel for the very limited purpose of this motion.

FILED
DEC 20 2012
TAYANA C. BRUSHALL, CLERK
U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS
DALLAS

RD

4. Anne Arundel County, Maryland's undersigned counsel has been admitted to the United States Bankruptcy Court for the District of Maryland since 1992.

WHEREFORE, Anne Arundel County, Maryland requests that this Court grants its Motion for Leave to Proceed Without Local Counsel, and such other and further relief as justice and its cause may require.

Respectfully submitted this 19th day of December, 2012.

JONATHAN A. HODGSON
County Attorney

/s/ Hamilton F. Tyler
Hamilton F. Tyler
Senior Assistant County Attorney
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Attorney for Anne Arundel County, Maryland

CERTIFICATE OF SERVICE

I hereby certify that on ^{UPON ISSUANCE OF AN ECF #} ~~December~~ 19th, 2012, a true and correct copy of the foregoing document ^{WILL BE} ~~was~~ filed electronically with the Court using the CM/ECF system, which sent notification to all parties of interest participating in the CM/ECF system.

/s/ Hamilton F. Tyler