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COUNSEL FOR THE MICHIGAN RETIREMENT SYSTEM ENTITIES

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**
	§	**Jointly Administered**
	§	
Debtors.	§	

MOTION FOR EXPEDITED HEARING ON THE EXPEDITED MOTION OF THE MICHIGAN RETIREMENT SYSTEM ENTITIES FOR ORDER AUTHORIZING EXAMINATION OF THE DEBTORS PURSUANT TO BANKRUPTCY RULE 2004

Strategic Ashby Ponds Lender LLC ("Ashby Ponds Lender") and Strategic Concord Landholder, LP ("Concord Landholder" and together with Ashby Ponds Lender, the "Michigan Retirement System Entities") respectfully file this Motion for an Expedited Hearing (this "Motion") on the *Expedited Motion of the Michigan Retirement System Entities for Order Authorizing Examination of the Debtors Pursuant to Bankruptcy Rule 2004* (the "Underlying Motion"). In support hereof, the Michigan Retirement System Entities would show the Court the following:

[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 (collectively, the "Debtors").

I. JURISDICTION

1. The Court has jurisdiction over the subject matter of this Motion pursuant to 28 U.S.C. §§ 157 and 1334. The statutory authority for the Motion is 11 U.S.C. § 1104. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

II. BACKGROUND

2. On October 19, 2009, the Debtors filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code") in the United States Bankruptcy Court for the Northern District of Texas, Dallas Division.

3. The Debtors remain in possession of their assets and continue to manage their businesses as debtors in possession.

4. No trustee or examiner has been appointed in these cases, although a motion seeking the appointment of an examiner has been filed with the Court.

III. RELIEF REQUESTED

5. By this Motion, the Michigan Retirement System Entities seek an order expediting the hearing date on the Underlying Motion from February 5, 2010 to January 13, 2010 at 9:30 a.m..

6. In the Underlying Motion, the Michigan Retirement System Entities seek authorization to conduct an examination of the Debtors in connection with certain strategic business decisions and overall reorganization process. The Michigan Retirement System Entities believe that the Debtors' Joint Plan of Reorganization and related asset sale raise serious questions regarding the fundamental fairness of the proposed reorganization. In any event, the Michigan Retirement System Entities lack information necessary to make an informed decision regarding the reasonableness of the Debtors' contemplated transactions.

7. The request for an expedited hearing does not prejudice any party in interest because the hearing time requested is currently set for an omnibus hearing date and most of the parties in interest will be present. Moreover, several other creditors and parties in interest have also moved for similar relief, and many of their respective motions will be heard by the Court on January 13, 2010.

8. It is critical that the Michigan Retirement System Entities receive the benefit of a proper examination of the Debtors. As the reorganization continues to move forward in an expeditious manner, the need for an expedited hearing on the Underlying Motion becomes even more appropriate to ensure a fair and proper administration of this reorganization.

WHEREFORE, the Michigan Retirement System Entities request that the Court enter an order granting this Motion and setting an expedited hearing on the Underlying Motion.

Dated: January 6, 2010

Respectfully Submitted,

BAKER BOTTS L.L.P.

/s/ Artoush Varshosaz

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COUNSEL FOR THE MICHIGAN RETIREMENT SYSTEM ENTITIES

CERTIFICATE OF SERVICE

The undersigned certifies that on this, the 6th day of January, a true and correct copy of the above Motion was served by electronic means through the CM/ECF system or email upon the parties listed on the updated service list (Docket No. 610).

/s/ *Artoush Varshosaz*

CERTIFICATE OF CONFERENCE

The undersigned certifies that on January 6, 2010, he called counsel for the Debtors, Mr. Vincent P. Slusher, concerning the relief requested in this Motion but was unable to reach Mr. Slusher. The undersigned left a voicemail regarding the relief requested in this Motion.

/s/ Artoush Varshosaz