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PROPOSED ATTORNEYS FOR LINCOLNSHIRE  
CAMPUS, LLC AND NAPERVILLE CAMPUS, LLC

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

-----	§	
In re:	§	Chapter 11
	§	
LINCOLNSHIRE CAMPUS, LLC,	§	Case No. 10-34176-11
	§	
Debtor.	§	
	§	
	§	
	§	
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In re:	§	Chapter 11
	§	
NAPERVILLE CAMPUS, LLC,	§	Case No. 10-34177-11
	§	
Debtor.	§	
	§	
	§	
-----	§	
In re:	§	Chapter 11
	§	
SEDGEBROOK INC.,	§	Case No. 10-34178-11
	§	
Debtor.	§	
	§	
-----	§	

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In re: §  
MONARCH LANDING, INC., § Chapter 11  
§  
Debtor. § Case No. 10-34179-11  
§  
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**MOTION FOR ORDER DIRECTING JOINT  
ADMINISTRATION OF THE DEBTORS' CHAPTER 11 CASES**

Lincolnshire Campus LLC (“Lincolnshire”) and Naperville Campus LLC (“Naperville”) debtors and debtors in possession by their proposed attorneys, DLA Piper LLP (US) and Monarch Landing, Inc. (“Monarch”), and Sedgebrook Inc. (“Sedgebrook”), debtors and debtors in possession by their proposed attorneys Whiteford, Taylor & Preston, L.L.P. and McGuire Craddock & Strother, P.C., (collectively, the “Debtors”) move (the “Motion”) this Court for entry of an order, pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Rule 1015.1 of the Local Rules for the United States Bankruptcy Court for the Northern District of Texas, requesting the entry of an order consolidating their separate chapter 11 cases for procedural purposes only, and providing for joint administration thereof. In support of this Motion, the Debtors respectfully represent as follows:

**Jurisdiction and Venue**

1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).
2. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409.
3. The statutory predicate for the relief sought herein is Bankruptcy Rule 1015(b).

### **Background**

4. On June 15, 2010 (the "Petition Date"), the Debtors commenced these chapter 11 cases by each filing a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code").

5. 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.

6. No trustee, examiner or committee has been appointed in any of the Debtors' chapter 11 cases.

### **Relief Requested**

7. By this Motion, the Debtors seek an order consolidating, for procedural purposes only, the administration of the Debtors' chapter 11 cases.

8. Bankruptcy Rule 1015(b) provides that, if two or more petitions are pending in the same court by a debtor and an affiliate, the court may order the joint administration of the estates of the debtor and such affiliates. See Fed. R. Bankr. P. 1015(b).

9. Lincolnshire Campus, LLC, and Naperville Campus, LLC, are wholly-owned subsidiaries of Erickson Retirement Communities, LLC ("ERC"). Currently pending in this Court are eighteen Chapter 11 cases involving ERC and numerous affiliates which cases are consolidated under Case No. 09-37010-SGJ-11. Those cases were filed on October 19, 2009 and on April 16, 2010 this Court entered an Order confirming the ERC's Fourth Amended Joint Plan of Reorganization under Chapter 11 of the Bankruptcy Code (the "ERC Plan").

10. Debtors Sedgebrook and Monarch are not for profit corporations that lease, pursuant to master leases, the land and improvements owned by Lincolnshire and Naperville.

Sedgebrook and Monarch operate senior living communities on the campuses owned by Lincolnshire and Naperville.

11. Pursuant to the ERC Plan, the old ERC became Senior Living Retirement Communities LLC and all rights to the name ERC were transferred to Redwood-ERC Senior Living Holdings LLC. The ERC Plan further provided that the management of Sedgebrook and Monarch Landing (both formerly managed by ERC) would continue to be managed by Senior Living Retirement Communities LLC (“Senior Living”), the successor by name change to ERC under the ERC Plan. Senior Living has subcontracted certain of its management duties to Erickson Senior Living, Inc., but remains the manager of Sedgebrook and Monarch.

12. Based upon the foregoing, each of the Debtors is related within the meaning of Bankruptcy Rule 1015(b) and accordingly, this Court may order the joint administration of the Debtors’ estates.

13. The Debtors anticipate that notices, applications, motions, other pleadings, hearings and orders in these cases may affect more than one of the Debtors or each of the Debtors. If each Debtor’s case were administered independently, there would be a number of duplicative pleadings and overlapping service. This unnecessary duplication of identical documents would be wasteful of the Debtors’ resources, as well as other parties’ and this Court’s resources.

14. Joint administration will permit the Clerk of the Court to use a single general docket for each of the Debtors’ cases and to combine notices to creditors and other parties in interest of the Debtors’ respective estates. Joint administration also will protect parties in interest by ensuring that all parties in interest will be able to review one docket to stay apprised of the various matters before the Court in each of the Debtors’ cases.

15. A proposed consolidated caption for all notices, applications, motions and other pleadings is annexed hereto as Exhibit A.

16. The Debtors request that a docket entry reflecting the joint administration of the Debtors' cases be made in each of the Debtors' cases as follows:

An order has been entered in this case directing the procedural consolidation and joint administration of the chapter 11 cases of Lincolnshire Campus, LLC, Monarch Landing Inc, Naperville Campus, LLC, and Sedgebrook Inc. The docket in Case No. 10-34176-11 should be consulted for all matters affecting this case.

17. Finally, the Debtors request that all future entries for all cases be made under the lead case In re Lincolnshire Campus, LLC, Case No. 10-34176-11.

#### **Notice**

18. Notice of this Motion has been provided to (a) the Office of the United States Trustee for the Northern District of Texas; (b) the Debtors' twenty largest unsecured creditors; and (c) counsel to the prepetition secured lenders. The Debtors submit that, in light of the nature of the relief requested, no other or further notice is necessary or required.

WHEREFORE, the Debtors respectfully request that the Court enter an order substantially in the form annexed hereto as Exhibit B, granting the relief requested herein and granting such other relief as may be deemed just and proper.

Dated: June 15, 2010  
Dallas, Texas

**DLA PIPER LLP (US)**

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and Naperville

**and**

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Proposed Attorneys for Sedgebrook and Monarch

**Exhibit A**

Proposed Caption



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

**In re:**

**LINCOLNSHIRE CAMPUS, LLC *et al.***

<sup>1</sup>

**Debtors.**

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**CASE NO. 10-34176-11**

**CHAPTER 11**

**Jointly Administered**

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<sup>1</sup> The Debtors in these chapter 11 cases are Lincolnshire Campus, LLC, Monarch Landing Inc, Naperville Campus, LLC, and Sedgebrook Inc.

**Exhibit B**

Proposed Order

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

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In re:

LINCOLNSHIRE CAMPUS, LLC,  
  
Debtor.

§ Chapter 11  
§  
§ Case No. 10-34176-11  
§  
§

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In re:

NAPERVILLE CAMPUS, LLC,  
  
Debtor.

§ Chapter 11  
§  
§ Case No. 10-34177-11  
§  
§

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In re:

SEDGEBROOK INC.,  
  
Debtor.

§ Chapter 11  
§  
§ Case No. 10-34178-11  
§  
§

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In re:

MONARCH LANDING, INC.,  
  
Debtor.

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§ Chapter 11  
§  
§ Case No. 10-34179-11  
§  
§

**ORDER DIRECTING JOINT ADMINISTRATION  
OF THE DEBTORS' CHAPTER 11 CASES**

Upon the Motion for an Order Directing Joint Administration of the Debtors' Chapter 11 Cases, dated June 15, 2010 (the "Motion"); and all as more fully set forth in the Motion; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and consideration of the Motion and the relief requested therein being a core proceeding pursuant to 28 U.S.C. §157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and

1409, and due and proper notice of the Motion having been provided to the necessary parties; and it appearing that no other or further notice need be provided; and a hearing having been held to consider the relief requested in the Motion (the “Hearing”); and the appearances of all interested parties having been noted in the record of the Hearing; and upon the record of the Hearing and all of the proceedings had before the Court; and no objections having been received; and the Court having determined that the relief sought in the Motion is in the best interests of the Debtors, their creditors, and all parties in interest; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is hereby:

ORDERED that the Motion is GRANTED; and it is further

ORDERED that the above-captioned chapter 11 cases are consolidated for procedural purposes only and shall be jointly administered by the Court; and it is further

ORDERED that parties in interest are directed to use the proposed caption annexed hereto as Exhibit 1 when filing pleadings with the Court in the chapter 11 cases of the Debtors indicating that each pleading relates to the jointly administered chapter 11 cases of “Lincolnshire Campus, LLC, et al.” The consolidated caption satisfies the requirements of section 342(c) of the Bankruptcy Code in all respects; and it is further

ORDERED that a docket entry shall be made in each of the Debtors’ cases substantially as follows:

An order has been entered in this case directing the procedural consolidation and joint administration of the chapter 11 cases of Lincolnshire Campus, LLC, Monarch Landing, Inc., Naperville Campus, LLC, and Sedgebrook, Inc. The docket in Case No. 10-34176-11 should be consulted for all matters affecting this case.

And it is further

ORDERED that the Debtors are authorized and empowered to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion; and it is further

ORDERED that this Court will retain jurisdiction to address all disputes related to the interpretation or enforcement of this Order.

**###End of Order###**

**Exhibit 1**

Official Caption

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

**In re:**

**LINCOLNSHIRE CAMPUS, LLC *et al.***

**1**

**Debtors.**

§  
§  
§  
§  
§  
§

**CASE NO. 10-34176-11**

**CHAPTER 11**

**Jointly Administered**

---

<sup>1</sup> The Debtors in these chapter 11 cases are Lincolnshire Campus, LLC, Monarch Landing Inc, Naperville Campus, LLC, and Sedgebrook Inc.

Allen, Jeff  
5141 Virginia Ave., Ste 460  
Brentwood, TN 37027

APCO Worldwide Washington DC  
700 12th Street, NW Suite 800  
Washington, DC 20005

Emerald Restaurant Service Inc.  
201 Airport Drive  
Joliet, IL 60431

FCA, Inc.  
2852 West Ogden Ave.  
Naperville, IL 60540

Floor Installation Techs Inc.  
1273 Marks Ct.  
Naperville, IL 60565

Get Fresh Produce  
1441 Brewer Creek Blvd.  
Bartlett, IL 60103

Grainger  
Dept. 865530927  
Palatine, IL 60038-0001

Grieshaber, Mark  
8711 Beverly Lane  
Orlando Park, IL 60462

Gulf South Medical Supply  
Attn: Melanie Brewer  
4345 South Point Blvd.  
Jacksonville, FL 32216

Healthcare Cosmetology Services, In  
PO Box 850243  
Braintree, MA 02185

Imbert Intl Inc.  
Dept 20-1084  
PO Box 5940  
Carol Stream, IL 60197-5940

Inside Out Painting  
1125 Paramount Parkway, Suite G  
Batavia, IL 60510

Lencioni Wholesale Meats, Inc  
1000 Brown Street  
Wauconda, IL 60084

Mickey's Linen  
PO Box 5789  
Villa Park, IL 60181

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and Popeo, P.C.  
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Boston, MA 02111-2657

S3 Integration  
1550 Caton Center Drive, Suite F  
Baltimore, MD 21227

Skyline Restoration, Inc.  
5435 W. 110th St., Suite 7  
Oak Lawn, IL 60453

Supreme Lobster  
200 E. North Avenue  
Villa Park, IL 60181-1221

Sysco Food Services - Chicago  
PO Box 5037  
Des Plaines, IL 60017-5037

Waste Management  
PO Box 4648  
Carol Stream, IL 60197-4648

Wells Fargo Bank, National Assoc.  
Attn: Lorna Gleason **[Email]**  
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William W. Kannel **[Email]**  
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Alpha Baking Company  
36230 Treasury Center  
Chicago, IL 60694

Architerra  
239 US Hwy 45  
Indian Creek, IL 60061

Becker Electrical Group Inc.  
4210 43rd Avenue  
Kenosha, WI 53144

Direct Supply Systems Inc.  
PO Box 88201  
Milwaukee, WI 53288-0201

Get Fresh Produce  
1441 Brewer Creek Blvd  
Bartlett, IL 60103

Gulf South Medical Supply  
Attn Melanie Brewer  
4345 South Point Blvd  
Jacksonville, FL 32216

Healthcare Cosmetology Services Inc  
PO Box 850243  
Braintree, MA 02185

Hershey Creamery Company  
301 S. Cameron Street  
PO Box 1821  
Harrisburg, PA 17105-1821

IKON Financial Services  
Attn Donna Tanner Spec Assets Dept  
PO Box 6338  
Macon, GA 31208-6338

Koeckritz International, Inc.  
1400 Hicks Road  
Rolling Meadows, IL 60008

Lencioni Wholesale Meats Inc.  
1000 Brown Street  
Wauconda, IL 60084

Linda Roberts & Associates Inc.  
104 East Roosevelt Rd. Suite 201  
Wheaton, IL 60187

Phase 2 Services  
143 Briarwood North  
Oak Brook, IL 60523

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Sovereign Bank  
Attn Brian Moran  
3 Friends Lane, 2nd Floor  
Newtown, PA 18940

Sun Office Products  
15508 E. 19th Avenue  
Aurora, CO 80011

Supreme Lobster  
200 E. North Ave  
Villa Park, IL 60181-1221

Sysco Food Services - Chicago  
PO Box 5037  
Des Plaines, IL 60017-5037

Universal Fleetcard  
PO Box 70997  
Charlotte, NC 28272-0997

U.S. Bank National Association  
Corporate Trust Services **[Email]**  
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NY, NY 10005

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Victoria, BC V8Z 7X8  
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