

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
RC SOONER HOLDINGS, LLC, <u>et al.</u> , ¹)	Case No. 10-10528 (BLS)
)	
Debtors.)	(Jointly Administered)
)	
)	Objection Deadline: March 15, 2010 at 4:00 p.m.
)	Hearing Date: March 18, 2010 at 10:30 a.m.

**NOTICE OF MOTION OF THE DEBTORS FOR AN ORDER AUTHORIZING
PRODUCTION OF DOCUMENTS AND EXAMINATION
OF A REPRESENTATIVE PURSUANT TO BANKRUPTCY RULE 2004**

PLEASE TAKE NOTICE that on March 8, 2010, the above-captioned debtors and debtors in possession (collectively, the “Debtors”) filed the **Motion of the Debtors for an Order Authorizing Production of Documents and Examination of a Representative Pursuant to Bankruptcy Rule 2004** (the “Motion”) with the United States Bankruptcy Court for the District of Delaware (the “Bankruptcy Court”). A copy of the Motion is attached hereto as Exhibit A.

PLEASE TAKE FURTHER NOTICE that any objections or responses to the Motion must be in writing, filed with the Clerk of the Bankruptcy Court, 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, and served upon the undersigned proposed counsel for the Debtors and Debtors in Possession **on or before 4:00 p.m. (prevailing Eastern Time) on March 15, 2010** (the “Objection Deadline”).

¹ The Debtors and the last four digits of their taxpayer identification numbers are: RC Sooner Holdings, LLC (7904); RC Brixton Square Owner, LLC (8002); RC Cedar Crest Owner, LLC (7914); RC Fulton Plaza Owner, LLC (8011); RC Magnolia Owner, LLC (7998); RC Pomeroy Park Owner, LLC (7939); RC Salida Owner, LLC (7947); RC Savannah South Owner, LLC (7983); RC Southern Hills Owner, LLC (7958); Brixton Square Apartments, LLC (1844); CC Apartments, LLC (1798); Fulton Plaza Apartments, LLC (4344); Magnolia Manor Apartments, LLC (4486); Pomeroy Park Apartments, LLC (1649); Salida Apartments, LLC (1915); Savannah South Apartments, LLC (8586); and Southern Hills Villa Apartments, LLC (1721). The business address for each of the Debtors where notices should be sent is 1515 Broadway, (continued...)

PLEASE TAKE FURTHER NOTICE that if an objection is timely filed, served and received and such objection is not otherwise timely resolved, a hearing to consider such objection and the Motion will be held on **March 18, 2010 at 10:30 a.m. (prevailing Eastern Time)** before the Honorable Brendan L. Shannon, United States Bankruptcy Judge, at the Bankruptcy Court, 824 Market Street, 6th Floor, Courtroom No. 1, Wilmington, Delaware 19801.

(...continued)

11th Floor, New York, New York 10036-8901.

IF NO OBJECTIONS TO THE MOTION ARE TIMELY FILED, SERVED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: March 8, 2010
Wilmington, Delaware

BALLARD SPAHR LLP

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Proposed Counsel for the Debtors and Debtors in Possession

² Admitted *pro hac vice*.