

# **EXHIBIT A**

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

In re: ) Chapter 11  
)  
RC SOONER HOLDINGS, LLC, et al.,<sup>1</sup> ) Case No. 10-10528 (BLS)  
)  
Debtors. ) (Jointly Administered)

**UNSWORN SUPPLEMENTAL DECLARATION PURSUANT TO  
28 U.S.C. § 1746(2) AND FED. R. BANKR. P. 2014(a) OF  
TOBEY M. DALUZ, ESQUIRE, A PARTNER IN BALLARD SPAHR LLP**

I, TOBEY M. DALUZ, ESQUIRE, declare as follows:

1. I am a partner in the law firm of Ballard Spahr LLP (“Ballard Spahr”). As such, I am duly authorized to execute this Supplemental Declaration on behalf of Ballard Spahr.

2. I am an attorney at law, duly admitted to practice law in the State of Delaware, the State of Pennsylvania, the United States District Court for the District of Delaware, and the United States District Court for the Eastern District of Pennsylvania.

3. I submit this Supplemental Declaration in further support of the Amended Application of the Debtors for an Order Authorizing the Retention and Employment of Ballard Spahr as Counsel to the Debtors and Debtors in Possession Pursuant to 11 U.S.C. §§ 327(a) and 328(a), Fed. R. Bankr. P. 2014(a) and Del. Bankr. L.R. 2014-1 *Nunc Pro Tunc* to the Petition Date (Docket No. 23) (the “Application”).

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<sup>1</sup> 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, 11th Floor, New York, New York 10036-8901.

4. By the Application, Ballard Spahr seeks approval to be paid \$100,000.00 from the Debtors to be held as a postpetition retainer (the "Retainer") for professional services rendered and charges and disbursements incurred postpetition. Such Retainer shall not be an "evergreen" retainer subject to replenishment, but rather a retainer to be held and applied over time to such postpetition fees and expenses as are approved for payment by the Bankruptcy Court until the Retainer is exhausted.

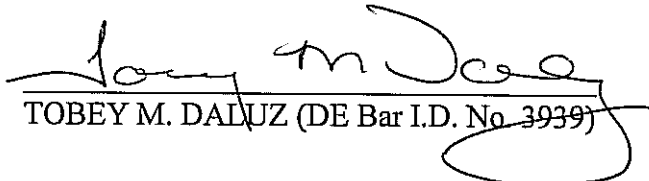
5. The Retainer is being funded by a capital contribution from AllStar Capital, Inc. ("AllStar Capital"), which entity is the sole member of RC Sooner Holdings, LLC. The capital contribution was approved by the shareholders of AllStar Capital. Ballard does not currently represent AllStar Capital in any matters.

6. By reason of the foregoing, and the facts set forth in the Unsworn Declaration Pursuant to 28 U.S.C. § 1746((2) and Fed. R. Bankr. P. 2014(a) of Tobey M. Daluz, Esquire, a Partner in Ballard Spahr LLP previously filed in support of the Application, I believe that Ballard Spahr is eligible for employment and retention by the Debtors pursuant to 11 U.S.C. §§ 327 and 328 and Fed. R. Bankr. P. 2014(a) and that the payment of the Retainer is appropriate under 11 U.S.C. § 328(a).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: March 15, 2010

FOR BALLARD SPAHR LLP:

  
TOBEY M. DALUZ (DE Bar I.D. No. 3939)