Vincent P. Slusher, State Bar No. 00785480

vincent.slusher@dlapiper.com

Andrew Zollinger, State Bar No. 24063944

andrew.zollinger@dlapiper.com

DLA Piper LLP (US)

1717 Main Street, Suite 4600 Dallas, Texas 75201-4629

Telephone: (214) 743-4500 Facsimile: (214) 743-4545

AND DEBTORS IN POSSESSION

PROPOSED ATTORNEYS FOR THE DEBTORS

Thomas R. Califano (pro hac vice pending) thomas.califano@dlapiper.com Gabriella L. Zborovsky (pro hac vice pending) gabriella.zborovsky@dlapiper.com Jacob S. Frumkin (pro hac vice pending) jacob.frumkin@dlapiper.com DLA Piper LLP (US) 1251 Avenue of the Americas

New York, New York 10020-1104

CHAPTER 11

Tel: (212) 335-4500 Fax: (212) 335-4501

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

In re: § CASE NO. 14-32821-11

§ § § SEARS METHODIST RETIREMENT SYSTEM, INC., et al. 1

§

Debtors. **Joint Administration Pending**

APPLICATION FOR ADMISSION PRO HAC VICE OF GABRIELLA L. ZBOROVSKY

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

The undersigned (the "Applicant") moves for admission to appear pro hac vice as attorney for the above-captioned debtors and debtors in possession (collectively, the "Debtors").

The Applicant respectfully certifies as follows:

1. Applicant is an attorney at the law firm of DLA Piper LLP (US), 1251 Avenue of the Americas, New York, New York 10020.

The debtors in these chapter 11 cases, along with the last four (4) digits of their taxpayer identification numbers, are: Sears Methodist Retirement System, Inc. (6330), Canyons Senior Living, L.P. (8545), Odessa Methodist Housing, Inc. (9569), Sears Brazos Retirement Corporation (8053), Sears Caprock Retirement Corporation (9581), Sears Methodist Centers, Inc. (4917), Sears Methodist Foundation (2545), Sears Panhandle Retirement Corporation (3233), Sears Permian Retirement Corporation (7608), Sears Plains Retirement Corporation (8233), Sears Tyler Methodist Retirement Corporation (0571), and Senior Dimensions, Inc. (4016). The mailing address of each of the debtors, solely for purposes of notices and communications, is 2100 Ross Avenue 21st Floor, c/o Paul Rundell, Dallas, Texas 75201.

- 2. Applicant will sign all pleadings with the name Gabriella L. Zborovsky.
- 3. DLA Piper has been retained, pending the Court's approval, to provide legal representation to the Debtors in the above-referenced chapter 11 cases.
- 4. The Applicant was admitted in New York in 2010 and is presently in good standing of the bar of the highest court of the state of New York and issued the bar license number of 4851614.
 - 5. Applicant has been admitted to practice before the following courts:
 - a. United States District Court for the Southern District of New York
 - b. United States District Court for the Eastern District of New York
 - c. United States District Court for the District of New Jersey
 - 6. Applicant is a member in good standing of the bars of the courts listed above.
- 7. Applicant has never been subject to a grievance proceeding or involuntary removal proceeding while a member of the bar of any state or federal court.
- 8. Applicant has never been charged, arrested, or convicted of a criminal offense or offenses.
- 9. Applicant has not filed a *pro hac vice* application in the past three (3) years in the United States Bankruptcy Court, Northern District of Texas.
- 10. Applicant has read *Dondi Props. Corp v. Savs. & Loan Ass'n*, 121 F.R.D. 284 (N.D. Tex. 1988) (*en banc*), and the local civil and bankruptcy rules of this court and will comply with the standards of practice adopted in *Dondi* and with the local civil and bankruptcy rules.
- 11. Applicant respectfully requests to be admitted to practice in the United States Bankruptcy Court, Northern District of Texas, for these chapter 11 cases.
- 12. Applicant is not an ECF Filer. The Applicant has also caused a true and correct copy of this document to be served via ECF upon each attorney of record and the original upon the U.S. Bankruptcy Court accompanied with the \$25.00 filing fee.

Dated: June 10, 2014 Dallas, Texas

DLA PIPER LLP (US)

By: /s/ Gabriella L. Zborovsky
Gabriella L. Zborovsky
New York State Bar No. 4851614
gabriella.zborovsky@dlapiper.com
DLA Piper LLP (US)
1251 Avenue of the Americas
New York, New York 10020-1104

Tel: (212) 335-4500 Fax: (212) 335-4501

PROPOSED ATTORNEYS FOR THE DEBTORS AND DEBTORS IN POSSESSION

Presented by:

Vincent P. Slusher State Bar No. 00785480 vincent.slusher@dlapiper.com DLA Piper LLP (US) 1717 Main Street, Suite 4600 Dallas, Texas 75201

Telephone: (214) 743-4572 Facsimile: (972) 813-6267

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

In re:	§	CASE NO. 14-32821-11

SEARS METHODIST RETIREMENT § § § § **CHAPTER 11**

SYSTEM, INC., et al. 1

Debtors. **Joint Administration Pending**

ORDER GRANTING APPLICATION FOR ADMISSION PRO HAC VICE

Upon consideration of the Application for Admission Pro Hac Vice filed by Gabriella L. Zborovsky, it is herby

ORDERED that the Application is GRANTED; and it is further

The debtors in these chapter 11 cases, along with the last four (4) digits of their taxpayer identification numbers, are: Sears Methodist Retirement System, Inc. (6330), Canyons Senior Living, L.P. (8545), Odessa Methodist Housing, Inc. (9569), Sears Brazos Retirement Corporation (8053), Sears Caprock Retirement Corporation (9581), Sears Methodist Centers, Inc. (4917), Sears Methodist Foundation (2545), Sears Panhandle Retirement Corporation (3233), Sears Permian Retirement Corporation (7608), Sears Plains Retirement Corporation (8233), Sears Tyler Methodist Retirement Corporation (0571), and Senior Dimensions, Inc. (4016). The mailing address of each of the debtors, solely for purposes of notices and communications, is 2100 Ross Avenue 21st Floor, c/o Paul Rundell, Dallas, Texas 75201.

ORDERED that Gabriella L. Zborovsky is admitted to appear *pro hac vice* before this court for the purpose of representing the Debtors in the above-referenced chapter 11 cases; and it is further

ORDERED that this Order shall not be considered admission to practice generally before this Court or the United States District Court for the Northern District of Texas.

###END OF ORDER###