

**EXHIBIT A**

**SUBJECT MATTERS OF THE DEBTORS' EXAMINATION AND  
DOCUMENTS REQUESTED**

**Specific subject matters to be explored at deposition**

1. The terms, provisions, and circumstances behind the execution and servicing of the Community Loans ("Community Loans") which are allegedly secured by the properties at Highland Springs (Dallas, TX), Wind Crest (Denver, CO), and Tallgrass Creek (Overland Park, Kansas) (the "Properties"), from January 1, 2005, to present.
2. Communications between the not-for-profit entities which operate the retirement communities at the Properties, on the one hand, and the Debtors, on the other, pertaining to the execution and servicing of the Community Loans, from January 1, 2005, to present.
3. Valuations of the Properties from January 1, 2005, to present.
4. Discussions between board members of the Debtors or agents or officers of the Debtors, from January 1, 2005, to present, pertaining to any of the following subjects:
  - a. the Community Loans which are allegedly secured by the Properties.
  - b. Valuations of the Properties.
  - c. Foreclosure of the construction loans on the Properties.
5. Communications between the Debtors and Redwood Capital Investments, LLC ("Redwood") which reference or concern the Properties or Community Loans from January 1, 2005, to present.

**General Instructions as to Documents Requested:**

A. Unless otherwise indicated, the document requests are limited to the period between January 1, 2005 to the present.

B. A document means any writing, electronic or otherwise, and any copy.

**Specific document requests:**

1. Communications between the not-for profit entities which operate the Properties, on the one hand, and the Debtors, pertaining to the execution and servicing of the Community Loans.

2. Valuations of the Properties.

3. All documents, including but not limited to board minutes of the Debtors, which reference any of the following subjects:

a. Value of the Properties;

b. Community Loans which are allegedly secured by the Properties;

c. Foreclosure of the construction loans on the Properties.

4. Communications between the Debtors and Redwood which reference or concern the Properties or Community Loans.

5. All documents that refer or relate to the Community Loans.