

EXHIBIT A

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

General Instructions and Information

1. The term "document" includes both paper documents and electronically stored information, and any copy thereof, and shall have the broadest meaning permitted under Federal Rule of Civil Procedure 26(a)(1)(A)(ii).

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

3. If the Debtors contend that any document responsive to any request is privileged or otherwise protected from discovery, in whole or in part, then with respect to each such document:

- (a) State the nature of the privilege or protection asserted; and
- (b) Specify the date of the document, the nature of the document, the person(s) who prepared the document, each individual to whom the document, or a copy thereof, has been provided, and each person from whom the Debtors obtained the document.

4. If any requested document was, but is no longer, in the Debtors' possession, custody, or control, state what disposition was made of it, the reason for such disposition, and identify all persons believed to have possession, custody, or control of the document or any copies. If any responsive documents cannot be found, state the efforts made to ascertain their location.

5. The Michigan Retirements Systems reserve the right to supplement and amend this request at any time.

Subject Matter of Examination

6. Matters relating to the formulation of the Debtors' Joint Plan of Reorganization, other potential plans of reorganization, and overall reorganization strategies.
7. Matters relating to the marketing of the Debtors and their properties.
8. Information regarding the Debtors' disclosures, schedules, operating reports, and documents filed with the court.
9. Specific allocation of the proceeds from the proposed sale of the Debtors assets, particularly as such proceeds relate to each individual debtor.
10. Matters relating to the corporate governance of the Debtors.
11. With respect to the property located in Loudoun County, Virginia:
 - a. The terms, provisions, and circumstances behind the execution, servicing, and performance of the loans related to or otherwise secured by the property, including, without limitation, the Ashburn Community Loan (as defined in the Debtors' Joint Plan of Reorganization).
 - b. Communications between the not-for-profit entities which operate the retirement community in Loudoun County, Virginia and the Debtors related to the Community Loans.
 - c. Valuation of the property.
 - d. Discussions between board members of the Debtors or agents or officers of the Debtors pertaining to any of the following:
 - i. the Community Loans;
 - ii. valuation of the property; and

- iii. foreclosure of loans related to the property, such as Construction Loans.
 - e. Communications between the Debtors, on the one hand, and Redwood Capital Investments, LLC (“Redwood”) and its affiliates, on the other hand, related to the Community Loans or the property.
12. With respect to the property located in Glenn Mills, Pennsylvania:
- a. The terms, provisions, and circumstances behind the execution, servicing, and performance of the loans related to or otherwise secured by the property, including, without limitation, the Concord Community Loan (as defined in the Debtors’ Joint Plan of Reorganization).
 - b. The terms, provisions, and circumstances behind the execution, servicing, and performance of the Concord Ground Lease.
 - c. Communications between the not-for-profit entities which operate the retirement community in Glenn Mills, Pennsylvania and the Debtors related to the Community Loans.
 - d. Valuation of the property.
 - e. Discussions between board members of the Debtors or agents or officers of the Debtors pertaining to any of the following:
 - i. the Community Loans;
 - ii. valuation of the property; and
 - iii. foreclosure of loans related to the property, such as Construction Loans.

- f. Communications between the Debtors, on the one hand, and Redwood and its affiliates, on the other hand, related to the Community Loans or the property.

Specific Document Requests

13. All documents related to the information in the paragraphs above, including Paragraphs 6 through 12.

14. All documents requested of the Debtors by all other parties pursuant to their respective examinations and document requests under Rule 2004 of the Bankruptcy Rules.