

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

Caption in compliance with D.N.J. LBR 9004-2(c)

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*Proposed Co-Counsel for Debtors and
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In re:

TCI 2 HOLDINGS, LLC, *et al.*,¹

Debtors.

Chapter 11

Case No.: _____

(Jointly Administered)

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number, are: TCI 2 Holdings, LLC (0526); Trump Entertainment Resorts, Inc. (8402); Trump Entertainment Resorts Holdings, L.P. (8407); Trump Entertainment Resorts Funding, Inc. (8405); Trump Entertainment Resorts Development Company, LLC (2230); Trump Taj Mahal Associates, LLC, d/b/a Trump Taj Mahal Casino Resort (6368); Trump Plaza Associates, LLC, d/b/a Trump Plaza Hotel and Casino (1643); Trump Marina Associates, LLC, d/b/a Trump Marina Hotel Casino (8426); TER Management Co., LLC (0648); and TER Development Co., LLC (0425).

**AFFIDAVIT OF CHARLES A. STANZIALE, JR. REGARDING DISINTERESTEDNESS
IN SUPPORT OF DEBTORS' APPLICATION TO RETAIN, EMPLOY
AND COMPENSATE MCCARTER & ENGLISH, LLP AS BANKRUPTCY
COUNSEL FOR THE DEBTORS NUNC PRO TUNC TO THE PETITION DATE**

I, CHARLES A. STANZIALE, JR., verify and say:

1. I am an attorney at law in the State of New Jersey, State of New York and the District of Columbia. I am admitted to practice before the Supreme Court of the United States of America, the United States Court of Appeals for the Third Circuit, the United States District Court for the District of New Jersey, and the Court of International Trade.

2. I am a partner in the law firm of McCarter & English, LLP ("McCarter & English"), and I am duly authorized to make this statement on behalf of McCarter & English. This Affidavit is given in part on personal knowledge and in part on information and belief based on discussions with individuals of McCarter & English whom I consider reliable for the purposes of the matters discussed, and in part on reviewing records provided to me by McCarter & English's colleagues and employees.

3. This Affidavit is submitted in support of the Debtors' Application for an Order Authorizing Debtors to Retain, Employ and Compensate McCarter & English, LLP as Bankruptcy Counsel for Debtors Nunc Pro Tunc to the Petition Date pursuant to 11 U.S.C. §§ 327(a) of Title 11 of the United States Code (the "Bankruptcy Code") and in compliance with sections 329 and 504 of the Bankruptcy Code, rules 2014(a), 2016(b) and 5002 of Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and the Local Bankruptcy Rules for the district of New Jersey (the "Local Bankruptcy Rules").

4. McCarter & English has conducted, and continues to conduct, extensive research into its relations with the Debtors, their creditors, certain employees of the Office of the United States Trustee, and other parties interested in these cases. As part of this inquiry, McCarter & English obtained from the Debtors' a listing of names of individuals or entities who may be parties

in interest in these chapter 11 cases, including bondholders, banks, investors, officers, major creditors and indenture trustees (the "Potential Parties in Interest").² McCarter & English then entered the names of the Potential Parties in Interest into a computer database containing the names of all clients of McCarter & English and conflict information concerning such clients. This inquiry revealed that certain of the Potential Parties in Interest are or may be current or former McCarter & English clients. A list of these Potential Parties in Interest is set forth in Exhibit B hereto (the "Client Match List"). Through the information generated from the above-mentioned computer inquiry, it appears that any representation of the clients on the Client Match List concerned matters in which such clients were not adverse to the Debtors. To the extent that a current McCarter & English client is a creditor of the Debtors and asserts claims or is subject to objections or litigation brought by the Debtors, those actions can if necessary be prosecuted or defended by conflicts counsel, co-counsel, or other counsel selected by the Debtors.

5. Because of the size of the Debtors' corporate organization, contacts and relationships between McCarter & English (on the one hand) and the Debtors and/or their creditors (on the other hand) have taken place in past years and will likely take place in the future. McCarter & English submits that any such contacts or relationships do not create any conflicts with respect to McCarter & English's representation of the Debtors. In particular, to the best of my information and belief, McCarter & English has represented, currently represents, or may in the future represent in matters unrelated to the Debtors, the entities or affiliates of the entities summarized in the Client Match List. Many of the clients on the Client Match List are identified solely because one of its affiliates might be a client of McCarter & English. In addition, McCarter & English does not represent any of the entities on the Client Match List with respect to matters related to the Debtors. Moreover,

² The Potential Parties in Interest include those individuals or entities identified by the Debtors as the (a) holders of the Senior Notes, (b) largest trade (and other) creditors of each of the Debtors, (c) major shareholders of Trump, and (d) directors and officers of the Debtors.

McCarter & English has indeed been adverse to many of these entities or affiliates in the past. Also, McCarter & English may have represented, or currently represents, certain trade organizations or industry groups which include certain Potential Parties in Interest on matters not adverse to the Debtors. If, in McCarter & English's continuing efforts, McCarter & English identifies any additional matches, McCarter & English will advise the Court.

6. In the past, McCarter & English represented clients in matters that were adverse to the Debtors as follows:

Client	Debtor Entity	Status
Bear Sterns	Trump (Penthouse Property)	Matter was closed on 10/01/91
Citylink of London	Trump Taj Mahal Associates	Matter was closed on 01/24/01 and billing attorney is no longer with the firm.
Eric Hausler	Trump Entertainment Resorts Holdings, L.P.	Matter was last billed on 11/10/06 and billing attorney is no longer with the firm.
Global Gaming Technology, Inc.	Trump Plaza	Matter was closed on 05/07/99
Lasala Construction	Donald Trump	Matter was closed on 03/23/01 and billing attorney is no longer with the firm
Bernard Lackner	Trump	Matter was closed on 05/31/06 and billing attorney is no longer with the firm
PNC Bank, N.A.	Trump Plaza Associates	Matter was closed on 04/04/95
Dr. Arman Roskar	Trump Organization	Matter was closed on 04/02/07
Sara Villamil	Trump Palace Sales	Matter was closed on 11/21/95
Wachovia Bank	Trump Taj Mahal Associates	Matters were closed on 10/07/08, 05/17/05, 05/31/02 and 11/29/04 and billing attorney is no longer with the firm

7. McCarter & English has, to the best of my knowledge and belief, represented or continues to represent, in matters unrelated to the Debtors, certain of the entities that are noteholders or affiliates of noteholders, creditors or affiliates of creditors, contract parties or affiliates of contract parties, shareholders or affiliates of shareholders in the Debtors. Any such entities that are current clients of McCarter & English (and/or their known affiliates) whose individual billings constituted 1% or more of McCarter & English's total billings during 2008 are indicated in Exhibit B, Table 1. Set forth in Exhibit B, Table 2, is a list of entities that are current clients of McCarter & English (and/or their affiliates) whose individual billings constituted less than 1% of McCarter & English's billings during 2008. Exhibit B, Table 3 is a list of entities that are parties in interest actively represented by McCarter & English during 2008 but that are no longer active clients.

8. Additionally, neither I, McCarter & English, any member of McCarter & English, nor any attorney of McCarter & English:

- a. is a creditor of the Debtors (including by reason of unpaid fees for services rendered prior to the date of this Affidavit);
- b. is a direct or indirect equity interest holder of any the Debtors;
- c. is or has been an officer, director or employee of the Debtors or an "insider" of the Debtors as that term is defined in § 101(31) of Title 11 of the United States Code, 11 U.S.C. §§ 101, et seq. (the "Bankruptcy Code");
- d. is or has been an investment banker for any security (outstanding or otherwise) of the Debtors or an attorney for such an investment banker in connection with the offer, sale, or issuance of a security of the Debtors; or director, officer or employee of an investment banker for any security (outstanding or otherwise) of the Debtors);
- e. presently represents a creditor or equity interest holder of the Debtors, or a person otherwise adverse or potentially adverse to the Debtors on any matter that is related to the Debtors or, except as described in paragraphs 5 and 6 above, on any matter that is unrelated to the Debtors; and
- f. except as described in paragraphs 5 and 6 above, has any other connection with the Debtors' creditors, the Office of the United States Trustee or any

employee of that office or any other parties in interest; or has any other interest, direct or indirect, which may affect or be affected by the proposed representation. McCarter & English will represent no entity other than the Debtors in connection with this case.

9. To the best of my knowledge, information and belief, McCarter & English

previously represented the Debtors as follows:

Debtor Entity	Matter	Status
Trump Entertainment Resorts Holdings, L.P., Trump Marina Hotel Casino, Trump Plaza Associates and Trump Taj Mahal Associates	C. Lee Dempsey	Matters were opened on 11/18/08, 12/04/08 and 12/01/08
Trump Entertainment Resorts Holdings, L.P.	New Jersey Tax	Matter opened on 12/08/06 and the last bill date is 06/11/07
Trump Hotels & Casino Resorts, Inc.	Curb and James Conlon	Matter was closed on 08/12/04 and the billing attorney is no longer with the firm
Trump Hotels & Casino Resorts, Inc	Property Tax Appeals	Matter was closed on 05/17/04 and the billing attorney is no longer with the firm
Trump Hotels & Casino Resorts, Inc	Ads. Robert Colon	Matter was closed on 12/28/04 and the billing attorney is no longer with the firm
Trump Hotels & Casino Resorts, Inc	Ads. Doug Grant Inc., et al	Matter was closed on 06/10/02 and the billing attorney is no longer with the firm
Trump Marina Hotel Casino	Ads. Arnold Snyder	Matter was closed on 12/28/04 and the billing attorney is no longer with the firm
Trump Marina Hotel Casino	Ads. Paul Baptiste	Matter was closed on 07/18/02 and the billing attorney is no longer with the firm
Trump Plaza Associates	Cory Moyer and Advocates for Disabled Americans	Matter was opened on 01/10/08

Trump Taj Mahal Associates	Ben Vuong	Matter was opened on 10/07/02
THCR/LP Corporation; Trump Taj Mahal Associates; Trump Plaza Associates; Trump Marina Associates, L.P.	Reorganized Chapter 11 Debtor	Matter was opened on 12/09/08

10. I have had connections with the Debtors prior to my association with McCarter & English in October 2008. In 1991 and 1992 I formerly represented various Trump entities as co-counsel with the firm of Wilkie-Farr in bankruptcy proceedings filed in the United States Bankruptcy Court for the District of New Jersey under the following Debtor names and Case Numbers: Trump Taj Mahal Associates, Case No. 91-13321 (RG); Trump Taj Mahal, Inc., Case No. 91-13325 (RG); The Trump Taj Mahal Corporation, Case No. 91-13351 (RG); Trump Taj, Case No. 13334 (RG); Trump Plaza Associates, Case No. 92-11188 (JW); Trump Plaza Hotel & Casino, Case No. 92-11189 (JW). I also provided representation to the Trump Taj Mahal Casino Resorts in the termination of its lease agreement with All Star Cafe. Additionally, I represented various Trump entities with co-counsel Latham & Watkins, LLP in bankruptcy proceedings filed in the United States Bankruptcy Court for the District of New Jersey under various Debtor names and Case Numbers³ that were jointly administered at Case No. 04-46898-JHW; THCR/LP Corporation,

³ Case No. 04-46899-JHW; Trump Taj Mahal Associates, a New Jersey General Partnership; Case No. 04-46900-JHW; Trump Plaza Associates, a New Jersey General Partnership; Case No. 04-46901-JHW; Trump Marina Associates, L.P., a New Jersey Limited Partnership; Case No. 04-46902-JHW; Trump Indiana Realty, LLC, a Delaware Limited Liability Company; Case No. 04-46903-JHW; Trump Indiana Casino Management, LLC; Case No. 04-46904-JHW; THCR Management Holdings, LLC; Case No. 04-46905-JHW; THCR Management Services, LLC; Case No. 04-46906-JHW; THCR Enterprises, LLC; Case No. 04-46907-JHW; THCR Enterprises, Inc.; Case No. 04-46908-JHW; Trump Internet Casino, LLC; Case No. 04-46909-JHW; Trump Hotels & Casino Resorts Development Company, LLC; Case No. 04-46910-JHW; Trump Atlantic City Associates; Case No. 04-46911-JHW; Trump Casino Holdings, LLC; Case No. 04-46912-JHW; Trump Casino Funding, Inc.; Case No. 04-46913-JHW; Trump Atlantic City Funding, Inc.; Case No. 04-46914-JHW; Trump Marina, Inc.; Case No. 04-46915-JHW; Trump Hotels & Casino Resorts Holdings L.P.; Case No. 04-46916-JHW; Trump Atlantic City Holding, Inc.; Case No. 04-46917-JHW; Trump Hotels & Casino Resorts, Inc.; Case No. 04-46918-JHW; THCR Holding Corp.; Case No. 04-46919-

f/k/a TM/GP Corporation. In addition to the above investigation, McCarter & English sent a general inquiry to all attorneys to determine whether any such individuals hold any securities of, or claims against, the Debtors. To date, I have received no responses from individual attorneys indicating that they hold claims against the Debtors.

11. Neither McCarter & English, nor any associate, of counsel, or partner of the firm, is or was an investment banker for any outstanding security of the Debtors. To the best of my knowledge and information, neither McCarter & English, nor any current associate, of counsel, or partner of the firm, is or was a director, officer or employee of the Debtors or of any investment banker in connection with any security of the Debtors.

12. While McCarter & English has undertaken, and continues to undertake, extensive efforts to identify connections with the Debtors and other parties in interest, it is possible that connections with some parties in interest have not yet been identified. Should McCarter & English, through its continuing efforts, learn of any new connections of the nature discussed herein, McCarter & English will so advise the Court.

13. McCarter & English will not, while employed by the Debtors, represent against the Debtors any other entity having an adverse interest in the matters upon which the Debtors seek to retain McCarter & English during the pendency of these cases.

14. I have read the application of the Debtors for an order approving the retention of McCarter & English as counsel that accompanies this Affidavit and, to the best of my knowledge, information and belief, the contents of such application are true and correct.

JHW; Trump Hotels & Casino Resorts Funding, Inc.; Case No. 04-46920-JHW; Trump Plaza Funding, Inc.; Case No. 04-46921-JHW; Trump Atlantic City Funding II, Inc.; Case No. 04-46922-JHW; Trump Atlantic City Funding III, Inc.; Case No. 04-46923-JHW; Trump Atlantic City Corporation; Case No. 04-46924-JHW; Trump Indiana, Inc.; and Case No. 04-46925-JHW; THCR Ventures, Inc.

**STATEMENT UNDER SECTION 329 OF THE BANKRUPTCY CODE
AND UNDER FEDERAL RULE OF BANKRUPTCY PROCEDURE 2016**

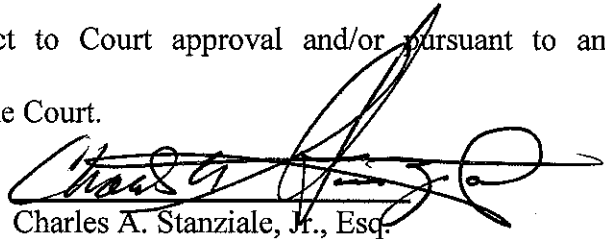
15. In anticipation of preparing for filing these chapter 11 cases, McCarter & English received a retainer of \$505,000. On or about February 5, 2009, McCarter & English invoiced and paid from the retainer \$154,291.25. The retainer was replenished in the amount of \$154,291.25 on February 10, 2009. On February 13, 2009, an additional retainer of \$150,000 was received. On February 16, 2006, \$268,452.51 was paid to McCarter & English from the retainer. As of the Petition Date, approximately \$386,547.49 remained in the retainer subject to final reconciliation of fees and costs incurred prior to the Petition Date.⁴

16. McCarter & English has agreed to employment by the Debtors at the firm's customary, hourly rate for comparable matters, including paralegal services, and understands that the firm's compensation is to be paid and the expenses and costs are to be reimbursed upon application to the Court and is subject to the Court's approval and/or pursuant to any administrative procedures established by Order of the Court, after notice and a hearing. McCarter & English anticipates that attached hereto as **Exhibit A** is the core team of lawyers and paralegals who will be responsible primarily for this engagement and the current hourly rates, which McCarter & English customarily charges for their services.

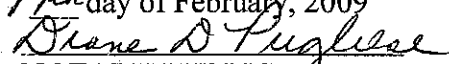
17. These rates may change from time to time in accordance with McCarter & English established billing practices and procedures. McCarter & English will maintain detailed, contemporaneous records of time and necessary expenses provided or incurred in connection with the rendering of the legal services described above by category and nature of the services rendered.

⁴ The amount of the retainer remaining after McCarter & English's fees and expenses reflects deductions for the amount of estimated fees and expenses incurred for the period prior to the Petition Date. Accordingly, the amount of the retainer remaining after application of McCarter & English's actual fees and expenses for the pre-petition period may differ from the amount reported above. McCarter & English expects to (a) complete its reconciliation of pre-petition fees and expenses actually incurred through the Petition Date within ten (10) days of the filing and (b) make a corresponding adjustment to the application of the retainer on or about that date. McCarter & English will not apply any portion of the retainer to fees and expenses from and after the Petition Date unless and until authorized to do so by a further order of this Court.

18. McCarter & English customarily and generally charges clients for the cost of support services the firm provides in connection with a representation, including, without limitation, photocopying charges, long distance telephone calls, facsimile transmissions, messengers, courier mail, secretarial and administrative overtime and temporary services, travel, computer research, lodging and catering for meetings. Some of these services are provided by McCarter & English, in which case the charges are set by McCarter & English, and others are provided by third party service providers, in which case the charges are set by the providers. All such charges for which McCarter & English seeks payment are subject to Court approval and/or pursuant to any administrative procedure established by Order of the Court.



Charles A. Stanziale, Jr., Esq.

Sworn to before me this
17th day of February, 2009

NOTARY PUBLIC

Diane D. Pugliese
A Notary Public of New Jersey
My Commission Expires April 1, 2013

EXHIBIT A

MCCARTER & ENGLISH, LLP'S HOURLY BILLING RATES

General Range of Rates

Partners	\$375 - \$680 per hr.
Associates	\$205 - \$395 per hr.
Law Clerks	\$145 - \$190 per hr.
Paralegals	\$125 - \$225 per hr.

Partners Expected to be Most Active

Charles A. Stanziale, Jr.	\$575 per hr.
Joseph Lubertazzi, Jr.	\$495 per hr.
Lisa S. Bonsall	\$495 per hr.
Curtis A. Johnson	\$485 per hr.
Carol Stern	\$450 per hr.
Jeffrey T. Testa	\$390 per hr.
Brian L. Baker	\$390 per hr.

Associates Expected to be Most Active

Kathleen Keating	\$350 per hr.
Angela S. Abreu	\$315 per hr.
Veronica Montagna	\$280 per hr.
Meena Untawale	\$275 per hr.

Paralegals Expected to be Most Active

Steve Bechtler	\$210 per hr.
Stacy Lipstein	\$175 per hr.
Ceil Beirne	\$175 per hr.

EXHIBIT B

TABLE (1): CURRENT CLIENTS OF MCCARTER & ENGLISH WITH BILLINGS IN EXCESS OF 1% OF MCCARTER & ENGLISH'S TOTAL 2008 BILLINGS

Client Name	Relationship With Debtors	% of total billings in 2008
None	N/A	N/A

TABLE (2): CURRENT CLIENTS OF MCCARTER & ENGLISH WITH BILLINGS BELOW 1% OF MCCARTER & ENGLISH'S TOTAL 2008 BILLINGS

Client Name	Relationship With Debtors
Lehman Brothers Inc.	Bondholder (Hedge Fund Custodian)
Citigroup Global Markets Inc./Salomon Brothers	Bondholder (Hedge Fund Custodians, Retail Brokerage Accounts)
Morgan Stanley & Co. Inc., Morgan Stanley DW Inc.	Bondholder (Hedge Fund Custodians, Retail Brokerage Accounts) Equity Holder (Greater than 5%) Holds a Fully-Secured Letter of Credit
MFS Investment Management a/k/a Massachusetts Financial Services (sub. of Sun Life Assurance Company of Canada whose ultimate parent is Sun Life Financial Inc.)	Bondholder (Holding/Management Co.)
Franklin Mutual (sub. of Franklin Resources Inc. a/k/a Franklin Templeton Investments)	Bondholder (Holding/Management Co.), Equity Holder (Greater than 5%)
LPL Financial Corporation (Linsco/Private Ledger Corp.)	Bondholder (Retail Brokerage Accounts)
Goldman Sachs & Co., Goldman Sachs Execution & Clearing LP, Goldman Sachs International	Bondholders (Hedge Fund Custodians)
Merrill Lynch Pierce Fenner & Smith Inc., Merrill Lynch Safekeeping, Merrill Lynch Pierce Fenner (ALL acquired by Bank of America)	Bondholders (Hedge Fund Custodians) Former Advisor, Small Creditor
JP Morgan Chase f/k/a Chase Manhattan, JP Morgan Chase - London, JP Morgan Chase-Israel, JP Morgan Chase, JPMC Clear, JP Morgan Securities Inc. - Fixed Income	Bondholders (Hedge Fund Custodians, Holding/Management Co.) Secondary Depository (Bank),
MFC Global Investments Inc.	Bondholders (Holding/Management Co.)
State Street Wealth Management, State Street Bank & Trust Company	Bondholders (Holding/Management Co.)

Banc of America Securities LLC (as agent for BA Futures Inc.), Banc of America Securities LLC, Banc of America Securities LLC/Bank of America NA - London Branch	Bondholders (Holding/Management Co.), Stock Clearing Company
Credit Suisse First Boston, Credit Suisse Asset Management, Credit Suisse Securities (USA) LLC,	Bondholders (Holding/Management Co., Hedge Fund Custodians), Secondary Depository (Bank),
DB Advisors, Deutsche Bank Securities	Bondholders (Holding/Management Co., Hedge Fund Custodians) Former Advisor
RBC (Ci) Ltd. (J), RBC Toronto, RBC Dain Rauscher	Bondholders (Holding/Management Co., Retail Brokerage Accounts)
TD Bank f/k/a Commerce Bank, Commerce National Bank, TD Ameritrade Clearing Inc.	Bondholders (Retail Brokerage Accounts), Main Depository (Bank)
Wachovia Securities LLC, Wells Fargo Investment LLC	Bondholders (Retail Brokerage Accounts)
Bank of New York - The /fmsbonds, Inc., BNY - Barclay Capital Securities Ltd., Standish Mellon Asset Management Company LLC	Bondholders (Retail Brokerage Accounts, Hedge Fund Custodians, Holding/Management Co.)
UBS Securities LLC, UBS Financial Services LLC	Bondholders (Retail Brokerage Accounts, Holding/Management Co.)
US Bank, N.A., US Bancorp Investments, Inc.	Indenture Trustee
Clear Channel Outdoor	Leaseholders
De Lage Landen Financial Services	Leaseholders
Eastman Kodak	Leaseholders
Beal Bank Nevada, Beal Bank, S.S.B. ¹	Secured Creditors
ADT Security & Services (sub. of Tyco International)	Unsecured Creditor

¹ Beal Bank is a subsidiary of Beal Financial Corporation, based in Plano, Texas. McCarter & English represents or has represented Beal Service Corporation, an affiliate of Beal Bank and a wholly-owned subsidiary of Beal Financial Corporation on matters unrelated to the Debtors. Beal Service Corporation provides administrative support to other units of Beal Financial Corporation, including Beal Bank and Beal Savings Bank.

Aramark Sports & Entertainment, Aramark Uniform Services	Unsecured Creditor
Chubb Group	Unsecured Creditor
Comcast	Unsecured Creditor
Deloitte & Touche	Unsecured Creditor
Ernst & Young	Unsecured Creditor
Horizon Blue Cross/Blue Shield	Unsecured Creditor
ReliaStar Life Insurance Company (sub. of ING)	Unsecured Creditor
Schindler Elevator Company	Unsecured Creditor
The Depository Trust Company	Unsecured Creditor
Verizon	Unsecured Creditor

**TABLE (3): FORMER CLIENTS OF MCCARTER & ENGLISH WERE ACTIVE CLIENTS
IN 2008**

Client Name	Relationship With Debtors
GoldenTree Asset Management LP	Bondholder
Otis Elevator (sub. Pratt & Whitney, both Otis and Pratt are owned by United Technologies)	Unsecured Creditor