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*Attorneys for Plaintiffs*

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

**In re:** § **CASE NO. 09-37010**  
§ **CHAPTER 11**  
ERICKSON RETIREMENT §  
COMMUNITIES, LLC, *et al.*,<sup>1</sup> § **(Jointly Administered)**  
§  
**Debtors.** §

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DALLAS CAMPUS, LP, DALLAS §  
CAMPUS GP, LLC, and ERICKSON §  
RETIREMENT COMMUNITIES, LLC, § **ADV. PRO. 09-03465**

**Plaintiffs,** §  
v. §  
MSRESS III DALLAS CAMPUS, L.P., §  
**Defendant.** §

**NOTICE OF AGREEMENT TO STAY DISCOVERY DEADLINES**

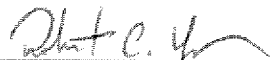
**PLEASE TAKE NOTICE** that Dallas Campus, LP, Dallas Campus GP, LLC, and Erickson Retirement Communities, LLC (collectively, the "Plaintiffs") and MSRESS III Dallas Campus, L.P. (the "Defendant"), by and through their respective attorneys, have executed a letter agreement (the "Letter Agreement"), attached hereto as Exhibit A, agreeing that all deadlines in

<sup>1</sup> The Debtors in these chapter 11 cases are Erickson Retirement Communities, LLC, Ashburn Campus, LLC, Columbus Campus, LLC, Concord Campus GP, LLC, Concord Campus, LP, Dallas Campus GP, LLC, Dallas Campus, LP, Erickson Construction, LLC, Erickson Group, LLC, Houston Campus, LP, Kansas Campus, LLC, Littleton Campus, LLC, Novi Campus, LLC, Senior Campus Services, LLC, Warminster Campus GP, LLC, and Warminster Campus, LP.

the adversary proceeding numbered 09-03465, including all discovery deadlines, are stayed pending confirmation of the Debtors' plan of reorganization, subject to the terms and conditions set forth in the Letter Agreement.

Dated: February 23, 2010  
Uniondale, New York

FARRELL FRITZ, P.C.

By:   
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**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the Notice of Agreement to Stay Discovery Deadlines (with Exhibit A) has been served this 23<sup>rd</sup> day of February, 2010 on counsel for the Defendant, as identified below, via electronic mail.

FARRELL FRITZ, P.C.

By:

  
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