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ATTORNEYS FOR THE DEBTORS AND DEBTORS IN POSSESSION

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

In re:

\$ CASE NO. 09-37010 (SGJ)

\$ ERICKSON RETIREMENT
COMMUNITIES, LLC, et al.

Debtors.

WITNESS AND EXHIBIT LIST

COME NOW the Debtors and Debtors in Possession and submit this Witness and Exhibit List for the April 15, 2010 hearing on the (i) Confirmation of Debtors' Fourth Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code; and (ii) Motion to Compromise Controversy with the HCP Entities. The Debtors reserve the right to amend and supplement this witness and exhibit list.

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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,

WITNESSES: Debtors may call the following witnesses in support of the motions:

- 1. Paul Rundell;
- 2. Gerald Doherty;
- 3. Any witness identified by any other party; and
- 4. Rebuttal witnesses, if necessary.

EXHIBITS:

- 1. Disclosure Statement for Debtors' Fourth Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code and all related exhibits thereto;
- 2. Debtors' Fourth Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code and all related exhibits thereto;
- 3. Plan Supplements [Doc. Nos. 1291, 1292];
- 4. Motion to compromise controversy [Doc. No. 1294];
- 5. Any exhibits listed by any other party; and
- 6. Rebuttal exhibits as necessary.

Dated: April 12, 2010

Dallas, Texas

Respectfully submitted, DLA Piper LLP (US)

By: /s/ Vincent P. Slusher
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