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ATTORNEYS FOR WELLS FARGO BANK NATIONAL ASSOCIATION,  
AS SUCCESSOR INDENTURE TRUSTEE

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

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In re:	X
	: CHAPTER 11
	:
ERICKSON RETIREMENT	: CASE NO. 09-37010
COMMUNITIES, LLC, et al. <sup>1</sup> ,	: (joint administration)
Debtors.	:
	X

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**WITHDRAWAL OF WELLS FARGO BANK NATIONAL ASSOCIATION’S MOTION,  
AS SUCCESSOR INDENTURE TRUSTEE, FOR TEMPORARY ALLOWANCE OF  
CERTAIN CLAIMS FOR PURPOSES OF VOTING TO ACCEPT OR REJECT THE  
PLAN PURSUANT TO BANKRUPTCY RULE 3018(A)  
[Related Docket No. 1205]**

Wells Fargo Bank National Association, not individually but as successor indenture trustee for the bonds described below (“Wells Fargo” or the “Bond Trustee”), files this Withdrawal of its Motion for Temporary Allowance of Certain Claims for Purposes of Voting to

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<sup>1</sup> The Debtors in these Chapter 11 cases are Erickson Retirement Communities, LLC (“ERC”), 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.

**WITHDRAWAL OF WELLS FARGO BANK NATIONAL  
ASSOCIATION’S MOTION, AS SUCCESSOR INDENTURE TRUSTEE, FOR  
TEMPORARY ALLOWANCE OF CERTAIN CLAIMS FOR PURPOSES OF  
VOTING TO ACCEPT OR REJECT THE PLAN PURSUANT TO BANKRUPTCY  
RULE 3018(A)**

Accept or Reject the Plan Pursuant to Bankruptcy Rule 3018(a) (“Withdrawal”),<sup>2</sup> and respectfully shows the Court as follows:<sup>3</sup>

1. In connection with the captioned cases, the Ann’s Choice Trustee, Linden Ponds Trustee and Monarch Landing Trustee, respectively, submitted various claims relating to the Ann’s Choice Bonds, Linden Ponds Bonds and Monarch Landing Bonds.

2. On March 26, 2010, the Debtors filed their Fifty-Third Omnibus Objection – Wells Fargo Bank NA Claims [Docket No. 1189] (the “Claims Objection”). The Claims Objection relates to certain of the claims filed by Wells Fargo in the captioned cases, including, without limitation, the following three Claims (the “Claims”):

<i><b>Claim Description</b></i>	<i><b>Debtor</b></i>
Claim # 1577 asserted by Ann’s Choice Trustee (the “Ann’s Choice Warminster GP Claim”)	Warminster Campus GP, LLC
Claim #1585 asserted by Linden Ponds Trustee (the “Linden Ponds Trustee ERC Claim”)	Erickson Retirement Communities, LLC
Claim # 1567 asserted by Monarch Landing Trustee (the “Monarch Landing Trustee ERC Claim”)	Erickson Retirement Communities, LLC

3. The Bond Trustee and Debtors have diligently worked towards a consensual resolution with respect to the Bond Trustee’s concerns and issues with the Claims Objection.

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<sup>2</sup> “Claims Estimation Motion” refers to Wells Fargo Bank National Association’s Motion, as Successor Indenture Trustee, for Temporary Allowance of Certain Claims for Purposes of Voting to Accept or Reject the Plan Pursuant to Bankruptcy Rule 3018(a) [Docket No. 1205].

<sup>3</sup> Capitalized terms shall have the meanings set forth in Wells Fargo Bank National Association’s Motion, as Successor Indenture Trustee, for Temporary Allowance of Certain Claims for Purposes of Voting to Accept or Reject the Plan Pursuant to Bankruptcy Rule 3018(a) [Docket No. 1205].

4. On or about April 13, 2010, the Bond Trustee and Debtors resolved the matters set to be heard on April 14, 2010 (the “Claims Estimation Hearing”) and Debtors withdrew their Claims Objections in their Notice of Withdrawal of Debtors’ Objections to the Claims [Docket No. 1313].<sup>4</sup>

5. The Bond Trustee has informed the Court, through its court coordinator, that the parties had settled the matters set for the Claims Estimation Hearing and removed the Claims Estimation Hearing from the docket.

6. This withdrawal is without prejudice to any and all rights of the Bond Trustee with respect to the Claims Objection and/or any and all claims asserted by the Bond Trustee in these cases.

7. Unless otherwise expressly agreed by the Bond Trustee, the Bond Trustee reserves any and all rights, obligations, claims and defenses with respect to the Bonds, including but not limited to those rights and defenses afforded to the Bond Trustee pursuant to the documents and agreements thereunder.

WHEREFORE, for the aforementioned reasons, the Bond Trustee hereby conditionally withdraws the Claims Estimation Motion without prejudice and subject to the reservation of rights as set forth herein.

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<sup>4</sup> See Docket No. 1313.

Date: April 15, 2010

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ATTORNEYS FOR WELLS FARGO BANK NATIONAL ASSOCIATION,  
AS SUCCESSOR INDENTURE TRUSTEE

**CERTIFICATE OF SERVICE**

I hereby certify that on April 15, 2010, a true and correct copy of the foregoing was served via email through the Bankruptcy Court's Electronic Case Filing System.

By: /s/ Cynthia Johnson Rerko  
Cynthia Johnson Rerko

**WITHDRAWAL OF WELLS FARGO BANK NATIONAL  
ASSOCIATION'S MOTION, AS SUCCESSOR INDENTURE TRUSTEE, FOR  
TEMPORARY ALLOWANCE OF CERTAIN CLAIMS FOR PURPOSES OF  
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