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

In re:	§	**CASE NO. 09-37010-sgj11**
	§	
ERICKSON RETIREMENT	§	**CHAPTER 11**
COMMUNITIES, LLC, *et al.*	§	
	§	
Debtors.[1]	§	

STIPULATION REGARDING SCHEDULED
VERIZON CLAIMS AND PROOF OF CLAIM NUMBER 1808

This stipulation (the "Stipulation") is made between Dan Lain, Trustee of the Liquidating Creditor Trust ("Liquidating Trustee") and Verizon Business Global and its affiliates and subsidiaries (collectively, "Verizon Business") in the above-referenced bankruptcy proceeding.

WHEREAS, Verizon Business filed proof of claim number 1808 in the amount of $240,608.98 ("Verizon Proof of Claim") against the Debtors' estates, based on a

[1]The Debtors in these Chapter 11 cases (the "Cases") were 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.

telecommunications agreement with the Debtors;

WHEREAS, Debtor Erickson Retirement Communities, LLC scheduled six claims for Verizon, Verizon Business, and Verizon CABS, for the total scheduled amount of $151,203.96, a summary of which is attached hereto as Exhibit A ("Scheduled Verizon Claims");

WHEREAS, the Parties have entered into negotiations as to the Verizon Proof of Claim and the Scheduled Verizon Claims and both Parties agree that the Verizon Scheduled Claims were superseded by the Verizon Proof of Claim and that the Verizon Scheduled Claims should be expunged pursuant to Federal Rule of Bankruptcy Procedure 3003(c)(4);

WHEREAS, this Stipulation will be fully effective upon approval by the Bankruptcy Court.

NOW, THEREFORE, in consideration of the foregoing recitals, which are incorporated into this Stipulation, the Parties hereby agree that the Verizon Scheduled Claims are superseded by the Verizon Proof of Claim and, as such, the Verizon Scheduled Claims are expunged pursuant to Federal Rule of Bankruptcy Procedure 3003(c)(4).

IN WITNESS WHEREOF and in agreement herewith, the Parties have executed and delivered this Stipulation as of the date the Bankruptcy Court approves this Stipulation and Order.

BRACEWELL & GIULIANI, LLP	STINSON MORRISON HECKLER LLP
/s/ Tricia R. DeLeon	*/s/ Darrell W. Clark*
Tricia R. DeLeon	Darrell W. Clark
Attorney for Dan Lain, Trustee of the Liquidating Creditor Trust	Attorney for Verizon Business Global

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