U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS

ENTERED

TAWANA C. MARSHALL, CLERK
THE DATE OF ENTRY IS
ON THE COURT'S DOCKET

The following constitutes the ruling of the court and has the force and effect therein described.

United States Bankruptcy Judge

Signed August 30, 2012

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 PROOF OF CLAIM
NUMBER 530-2 FILED BY SOUTH SHORE IRON WORKS, INC.

This stipulation (the "Stipulation") is made between Dan Lain, Trustee of the Liquidating Creditor Trust ("Liquidating Trustee") and South Shore Iron Works, Inc. ("South Shore") in the above-referenced bankruptcy proceeding.

WHEREAS, the Liquidating Trustee was appointed pursuant to the Debtors' Fourth Amended Joint Plan of Reorganization Under Chapter 11 of the Bankruptcy Code [Docket No.

[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.

1005] (as amended and confirmed by Order of this Court, the "Plan")[2];

WHEREAS, South Shore filed proof of claim number 530-2 against the Debtor Erickson Construction, LLC's estate based on a subcontract with the Debtor ("South Shore Proof of Claim");

WHEREAS, the Liquidating Trustee objected to the South Shore Proof of Claim in his Eighth Omnibus Objection to Reclassify Mechanics' Lien Claims on June 27, 2012;

WHEREAS, South Shore filed a Response to Liquidating Trustee's Eighth Omnibus Objection to South Shore Iron Works, Inc.'s M&M Secured Claim on August 3, 2012;

WHEREAS, the Parties agreed to continue the hearing on the Trustee's Objection to the South Shore Proof of Claim as set forth in his Eighth Omnibus Objection to September 12, 2012;

WHEREAS, the Parties agree that the South Shore Proof of Claim should be designated as a General Unsecured Claim, and, as such, shall receive the appropriate number of Tier A Trade Class interests in the Liquidating Creditor Trust and the right to receive distributions of the Trade Dividend pursuant to Section 6.4. of the Plan;

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 South Shore Proof of Claim is an Allowed General Unsecured Claim and shall receive a Tier A Trade Class interest in the Liquidating Creditor Trust in the amount listed in the South Shore Proof of Claim.

[2] Unless otherwise defined herein, all capitalized terms shall have the meaning ascribed to them in the Plan.

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

/s/ Lauren C. Kessler
Lauren C. Kessler

ATTORNEY FOR DAN LAIN, TRUSTEE OF THE
LIQUIDATING CREDITOR TRUST

- and -

CURTIS CASTILLO, PC

/s/ Mark A. Castillo
Mark A. Castillo

ATTORNEY FOR SOUTH SHORE IRON WORKS, INC.

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