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 PROOFS OF CLAIM
NUMBERS 499, 500, 501, AND 502 FILED BY WALLACE ROBERTS & TODD, LLC

This stipulation (the "Stipulation") is made between Dan Lain, Trustee of the Liquidating Creditor Trust ("Liquidating Trustee") and Wallace Roberts & Todd, LLC ("WRT") 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, WRT filed proofs of claim numbered 499, 500, 501, and 502 against the Debtors' estates based on certain contracts with the Debtors ("WRT Proofs of Claim");

WHEREAS, Erickson Retirement Communities, LLC scheduled an claim to WRT in the amount of $72,186.95 ("Scheduled Claim");

WHEREAS, the Parties have entered into negotiations as to the WRT Proofs of Claim and both Parties agree that Proof of Claim Number 502 should be disallowed and/or expunged in its entirety;

WHEREAS, the Parties agree that Proof of Claim 501 should be allowed as a general unsecured claim in the reduced amount of $42,269.77;

WHEREAS, the Parties agree that the Scheduled Claim should be disallowed and/or expunged in its entirety;

WHEREAS, the Parties agree that Proofs of Claim Numbers 499 and 500 should be allowed as general unsecured claims;

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 Proof of Claim Number 502 and the Scheduled Claim are expunged in their entirety; Proof of Claim Number 501 is an allowed general unsecured claim in the reduced amount of $42,269.77; and Proofs of Claim Numbers 499 and 500 are allowed general unsecured claims.

[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 -

BALLARD SPAHR LLP

_*/s/ David L. Pollack*_____
David L. Pollack

ATTORNEY FOR WALLACE ROBERTS & TODD, LLC

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