

## **VI. Treatment of Claims and Interests Under the Plan**

### **A. Classification and Treatment of Claims.**

The following tables summarize the treatment of each Class under the Plan. The tables also identify which Classes are entitled to vote on the Plan and the estimated recovery for Holders of Allowed Claims in each Class, pursuant to applicable provisions of the Bankruptcy Code.

#### **1. Treatment of Erickson Group Claims and Interests.**

<b>Class</b>	<b>Description</b>	<b>Treatment</b>	<b>Entitled to Vote</b>	<b>Estimated Recovery</b>
---	Administrative Expense Claims	Payment in full.	No	100%
---	Compensation and Reimbursement Claims	Payment in full.	No	100%
---	Priority Tax Claims	Payment in full.	No	100%
---	DIP Funding Claims	Payment in full.	No	100%
1	Other Priority Claims	Unimpaired.	No (deemed to accept)	100%
2	Secured Tax Claims	Unimpaired.	No (deemed to accept)	100%
3	Corporate Revolver Guaranty Claims	Impaired.	No (deemed to reject)	0%
4	Erickson Group Guaranty Claims	Impaired.	No (deemed to reject)	TBD
5	Interests in Erickson Group	Impaired.	No (deemed to reject)	0%

## 2. Treatment of ERC Claims and Interests.

<b>Class</b>	<b>Description</b>	<b>Treatment</b>	<b>Entitled to Vote</b>	<b>Estimated Recovery</b>
---	Administrative Expense Claims	Payment in full.	No	100%
---	Compensation and Reimbursement Claims	Payment in full.	No	100%
---	Priority Tax Claims	Payment in full.	No	100%
---	DIP Funding Claims	Payment in full.	No	100%
1	Other Priority Claims	Unimpaired.	No (deemed to accept)	100%
2	Secured Tax Claims	Unimpaired.	No (deemed to accept)	100%
3	Corporate Revolver Claims	Impaired.	Yes	50.6%
4	Interest Rate Swap Claims	Impaired.	Yes	50.6%
5	Other Secured Claims <sup>12</sup>	Unimpaired.	No (deemed to accept)	100%
6	UMBC Building Construction Loan Claims <sup>13</sup>	Impaired.	Yes	66.8%
7	Management Agreement Claims	Impaired.	Yes	100%
8	General Unsecured Claims	Impaired.	Yes	-----
9	Interests in ERC	Impaired.	No (deemed to reject)	0%

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12 This Class includes PNC Bank's claim secured by the Corporate Headquarters building and certain letters of credit claims held by PNC Bank.

13 Although Holders of UMBC Building Construction Loan Claims may assert their Claims against more than one Debtor Estate, each such Claim is subject to the single satisfaction rule.

**3. Treatment of Erickson Construction Claims and Interests.**

<b>Class</b>	<b>Description</b>	<b>Treatment</b>	<b>Entitled to Vote</b>	<b>Estimated Recovery</b>
---	Administrative Expense Claims	Payment in full.	No	100%
---	Compensation and Reimbursement Claims	Payment in full.	No	100%
---	Priority Tax Claims	Payment in full.	No	100%
---	DIP Funding Claims	Payment in full.	No	100%
1	Other Priority Claims	Unimpaired.	No (deemed to accept)	100%
2	Secured Tax Claims	Unimpaired.	No (deemed to accept)	100%
3	Mechanic's Lien Claims	Unimpaired.	No (deemed to accept)	100%
4	Corporate Revolver Claims	Impaired.	Yes	50.6%
5	UMBC Building Construction Loan Claims	Impaired.	Yes	66.8%
6	General Unsecured Claims	Impaired.	Yes	-----
7	Interests in Erickson Construction	Impaired.	No (deemed to reject)	0%

**4. Treatment of Senior Campus Claims and Interests.**

<b>Class</b>	<b>Description</b>	<b>Treatment</b>	<b>Entitled to Vote</b>	<b>Estimated Recovery</b>
---	Administrative Expense Claims	Payment in full.	No	100%
---	Compensation and Reimbursement Claims	Payment in full.	No	100%
---	Priority Tax Claims	Payment in full.	No	100%
---	DIP Funding Claims	Payment in full.	No	100%
1	Other Priority Claims	Unimpaired.	No (deemed to accept)	100%
2	Secured Tax Claims	Unimpaired.	No (deemed to accept)	100%
3	UMBC Building Construction Loan Claims	Impaired.	Yes	66.8%
4	General Unsecured Claims	Impaired.	Yes	-----
5	Interests in Senior Campus	Impaired.	No (deemed to reject)	0%

**5. Treatment of Ashburn Claims and Interests.**

<b>Class</b>	<b>Description</b>	<b>Treatment</b>	<b>Entitled to Vote</b>	<b>Estimated Recovery</b>
---	Administrative Expense Claims	Payment in full.	No	100%
---	Compensation and Reimbursement Claims	Payment in full.	No	100%
---	Priority Tax Claims	Payment in full.	No	100%
---	DIP Funding Claims	Payment in full.	No	100%
1	Other Priority Claims	Unimpaired.	No (deemed to accept)	100%
2	Secured Tax Claims	Unimpaired.	No (deemed to accept)	100%
3	Mechanic's Lien Claims	Unimpaired.	No (deemed to accept)	100%
4	Ashburn Construction Loan Claims	Impaired.	Yes	98.5%
5	Ashburn Community Loan Claims	Impaired.	Yes	100%
6	Ashburn Junior Loan Claims	Impaired.	No (deemed to reject)	0%
7	NFP Claims	Impaired.	No (deemed to reject)	0%
8	General Unsecured Claims	Impaired.	Yes	-----
9	Interests in Ashburn	Impaired.	No (deemed to reject)	0%

**6. Treatment of Columbus Claims and Interests.**

<b>Class</b>	<b>Description</b>	<b>Treatment</b>	<b>Entitled to Vote</b>	<b>Estimated Recovery</b>
---	Administrative Expense Claims	Payment in full.	No	100%
---	Compensation and Reimbursement Claims	Payment in full.	No	100%
---	Priority Tax Claims	Payment in full.	No	100%
---	DIP Funding Claims	Payment in full.	No	100%
1	Other Priority Claims	Unimpaired.	No (deemed to accept)	100%
2	Secured Tax Claims	Unimpaired.	No (deemed to accept)	100%
3	Columbus Improvement Bond Claims	Impaired.	Yes	100%
4	Mechanic's Lien Claims	Impaired.	Yes	-----
5	Columbus Construction Loan Claims	Impaired.	Yes	-----
6	Columbus Community Loan Claims	Impaired.	Yes	-----
7	Columbus Junior Loan Claims	Impaired.	Yes	-----
8	General Unsecured Claims	Impaired.	Yes	-----
9	Interests in Columbus	Impaired.	No (deemed to reject)	0%

**7. Treatment of Concord Claims and Interests.**

<b>Class</b>	<b>Description</b>	<b>Treatment</b>	<b>Entitled to Vote</b>	<b>Estimated Recovery</b>
---	Administrative Expense Claims	Payment in full.	No	100%
---	Compensation and Reimbursement Claims	Payment in full.	No	100%
---	Priority Tax Claims	Payment in full.	No	100%
---	DIP Funding Claims	Payment in full.	No	100%
1	Other Priority Claims	Unimpaired.	No (deemed to accept)	100%
2	Secured Tax Claims	Unimpaired.	No (deemed to accept)	100%
3	Mechanic's Lien Claims	Impaired.	Yes	-----
4	Concord Construction Loan Claims	Impaired.	Yes	97.4%
5	Concord Community Loan Claims	Impaired.	Yes	100%
6	Concord Junior Claims	Impaired.	No (deemed to reject)	0%
7	Other Secured Claims	Impaired.	Yes	TBD
8	NFP Claims	Impaired.	No (deemed to reject)	0%
10	General Unsecured Claims	Impaired.	Yes	-----
11	Interests in Concord	Impaired.	No (deemed to reject)	0%

**8. Treatment of Concord GP Claims and Interests.**

<b>Class</b>	<b>Description</b>	<b>Treatment</b>	<b>Entitled to Vote</b>	<b>Estimated Recovery</b>
---	Administrative Expense Claims	Payment in full.	No	100%
---	Compensation and Reimbursement Claims	Payment in full.	No	100%
---	Priority Tax Claims	Payment in full.	No	100%
---	DIP Funding Claims	Payment in full.	No	100%
1	Other Priority Claims	Unimpaired.	No (deemed to accept)	100%
2	Secured Tax Claims	Unimpaired.	No (deemed to accept)	100%
3	General Unsecured Claims	Impaired.	Yes	-----
4	Interests in Concord GP	Impaired.	No (deemed to reject)	0%



**9. Treatment of Dallas Claims and Interests.**

<b>Class</b>	<b>Description</b>	<b>Treatment</b>	<b>Entitled to Vote</b>	<b>Estimated Recovery</b>
---	Administrative Expense Claims	Payment in full.	No	100%
---	Compensation and Reimbursement Claims	Payment in full.	No	100%
---	Priority Tax Claims	Payment in full.	No	100%
---	DIP Funding Claims	Payment in full.	No	100%
1	Other Priority Claims	Unimpaired.	No (deemed to accept)	100%
2	Secured Tax Claims	Unimpaired.	No (deemed to accept)	100%
3	Mechanic's Lien Claims	Impaired.	Yes	-----
4	Dallas Construction Loan Claims	Impaired.	Yes	35.7%
5	Texas A&M Note Claims	Impaired.	Yes	82.8%
6	Dallas Community Loan Claims	Impaired.	Yes	100%
7	Dallas Junior Loan Claims	Impaired.	Yes	-----
8	NFP Claims	Impaired.	No (deemed to reject)	0%
9	General Unsecured Claims	Impaired.	Yes	-----
10	Interests in Dallas	Impaired.	No (deemed to reject)	0%

**10. Treatment of Dallas GP Claims and Interests.**

<b>Class</b>	<b>Description</b>	<b>Treatment</b>	<b>Entitled to Vote</b>	<b>Estimated Recovery</b>
---	Administrative Expense Claims	Payment in full.	No	100%
---	Compensation and Reimbursement Claims	Payment in full.	No	100%
---	Priority Tax Claims	Payment in full.	No	100%
---	DIP Funding Claims	Payment in full.	No	100%
1	Other Priority Claims	Unimpaired.	No (deemed to accept)	100%
2	Secured Tax Claims	Unimpaired.	No (deemed to accept)	100%
3	General Unsecured Claims	Impaired.	Yes	-----
4	Interests in Dallas GP	Impaired.	No (deemed to reject)	0%

# **11. Treatment of Houston Claims and Interests.**

<b>Class</b>	<b>Description</b>	<b>Treatment</b>	<b>Entitled to Vote</b>	<b>Estimated Recovery</b>
---	Administrative Expense Claims	Payment in full.	No	100%
---	Compensation and Reimbursement Claims	Payment in full.	No	100%
---	Priority Tax Claims	Payment in full.	No	100%
---	DIP Funding Claims	Payment in full.	No	100%
1	Other Priority Claims	Unimpaired.	No (deemed to accept)	100%
2	Secured Tax Claims	Unimpaired.	No (deemed to accept)	100%
3	Mechanic's Lien Claims	Impaired.	Yes	-----
4	Houston Construction Loan Claims	Impaired.	Yes	16.1%
5	Houston Community Loan Claims	Impaired.	Yes	100%
6	Houston Junior Loan Claims	Impaired.	Yes	[Participation in HCP Settlement]
7	NFP Claims	Impaired.	No (deemed to reject)	0%
8	General Unsecured Claims	Impaired.	Yes	-----
9	Interests in Houston	Impaired.	No (deemed to reject)	0%

**12. Treatment of Kansas Claims and Interests.**

<b>Class</b>	<b>Description</b>	<b>Treatment</b>	<b>Entitled to Vote</b>	<b>Estimated Recovery</b>
---	Administrative Expense Claims	Payment in full.	No	100%
---	Compensation and Reimbursement Claims	Payment in full.	No	100%
---	Priority Tax Claims	Payment in full.	No	100%
---	DIP Funding Claims	Payment in full.	No	100%
1	Other Priority Claims	Unimpaired.	No (deemed to accept)	100%
2	Secured Tax Claims	Unimpaired.	No (deemed to accept)	100%
3	Mechanic's Lien Claims	Impaired.	Yes	-----
4	Kansas Special Assessment Bond Claims	Unimpaired.	No (deemed to accept)	100%
5	Kansas Construction Loan Claims	Impaired.	Yes	4.4%
6	Kansas Community Loan Claims	Impaired.	Yes	100%
7	Kansas Junior Loan Claims	Impaired.	Yes	-----
8	NFP Claims	Impaired.	No (deemed to reject)	0%
9	General Unsecured Claims	Impaired.	Yes	-----
10	Interests in Kansas	Impaired.	No (deemed to reject)	0%

### 13. Treatment of Littleton Claims and Interests.

Class	Description	Treatment	Entitled to Vote	Estimated Recovery
---	Administrative Expense Claims	Payment in full.	No	100%
---	Compensation and Reimbursement Claims	Payment in full.	No	100%
---	Priority Tax Claims	Payment in full.	No	100%
---	DIP Funding Claims	Payment in full.	No	100%
1	Other Priority Claims	Unimpaired.	No (deemed to accept)	100%
2	Secured Tax Claims	Unimpaired.	No (deemed to accept)	100%
3	Mechanic's Lien Claims	Impaired.	Yes	-----
4	Littleton Construction Loan Claims	Impaired.	Yes	87.5%
5	Littleton Community Loan Claims	Impaired.	Yes	100%
6	Littleton Junior Loan Claims	Impaired.	Yes	12%
7	Other Secured Claims	Impaired.	Yes	TBD
8	NFP Claims	Impaired.	No (deemed to reject)	0%
9	General Unsecured Claims	Impaired.	Yes	-----
10	Interests in Littleton	Impaired.	No (deemed to reject)	0%

**14. Treatment of Novi Claims and Interests.**

<b>Class</b>	<b>Description</b>	<b>Treatment</b>	<b>Entitled to Vote</b>	<b>Estimated Recovery</b>
---	Administrative Expense Claims	Payment in full.	No	100%
---	Compensation and Reimbursement Claims	Payment in full.	No	100%
---	Priority Tax Claims	Payment in full.	No	100%
---	DIP Funding Claims	Payment in full.	No	100%
1	Other Priority Claims	Unimpaired.	No (deemed to accept)	100%
2	Secured Tax Claims	Unimpaired.	No (deemed to accept)	100%
3	Mechanic's Lien Claims	Unimpaired.	Yes	-----
4	Novi Construction Loan Claims	Impaired.	Yes	79.4%
5	Novi Community Loan Claims	Impaired.	Yes	100%
6	Novi Junior Loan Claims	Impaired.	Yes	[Participation in HCP Settlement]
7	Other Secured Claims	Impaired.	Yes	TBD
8	NFP Claims	Impaired.	No (deemed to reject)	0%
9	General Unsecured Claims	Impaired.	Yes	-----
10	Interests in Novi	Impaired.	No (deemed to reject)	0%

**15. Treatment of Warminster Claims and Interests.**

<b>Class</b>	<b>Description</b>	<b>Treatment</b>	<b>Entitled to Vote</b>	<b>Estimated Recovery</b>
---	Administrative Expense Claims	Payment in full.	No	100%
---	Compensation and Reimbursement Claims	Payment in full.	No	100%
---	Priority Tax Claims	Payment in full.	No	100%
1	Other Priority Claims	Unimpaired.	No (deemed to accept)	100%
2	Secured Tax Claims	Unimpaired.	No (deemed to accept)	100%
3	Mechanic's Lien Claims	Impaired.	Yes	-----
4	Warminster Community Loan Claims	Impaired.	Yes	100%
5	Warminster Purchase Option Deposit Refund Claims	Impaired.	Yes	100%
6	Warminster Junior Loan Claims	Impaired.	Yes	66.2%
7	Other Secured Claims	Impaired.	Yes	TBD
8	NFP Claims	Impaired.	No (deemed to reject)	0%
9	General Unsecured Claims	Impaired.	Yes	-----
10	Interests in Warminster	Impaired.	No (deemed to reject)	0%

# **16. Treatment of Warminster GP Claims and Interests.**

<b>Class</b>	<b>Description</b>	<b>Treatment</b>	<b>Entitled to Vote</b>	<b>Estimated Recovery</b>
---	Administrative Expense Claims	Payment in full.	No	100%
---	Compensation and Reimbursement Claims	Payment in full.	No	100%
---	Priority Tax Claims	Payment in full.	No	100%
1	Other Priority Claims	Unimpaired.	No (deemed to accept)	100%
2	Secured Tax Claims	Unimpaired.	No (deemed to accept)	100%
3	General Unsecured Claims	Impaired.	Yes	-----
4	Interests in Warminster GP	Impaired.	No (deemed to reject)	0%

## **B. Treatment of Unclassified Claims under the Plan.**

### **1. Administrative Expense Claims.**

Except to the extent that a Holder of an Allowed Administrative Expense Claim agrees to a different treatment, the Debtors shall pay to each Holder of an Allowed Administrative Expense Claim Cash in an amount equal to such Claim on the Effective Date, or as soon thereafter as is reasonably practicable; provided, however, that Allowed Administrative Expense Claims representing liabilities incurred in the ordinary course of business by the Debtors, as Debtors in Possession, or liabilities arising under obligations incurred by the Debtors, as Debtors in Possession, in accordance with the Budget (as defined in the DIP Facility), shall be paid by the Debtors, as applicable, in the ordinary course of business, consistent with past practice and in accordance with the terms and subject to the conditions of any agreements governing, instruments evidencing, or other documents relating to such transactions.

### **2. Compensation and Reimbursement Claims.**

All parties seeking payment of Compensation and Reimbursement Claims (i) shall file their respective final applications for allowance of compensation for services rendered and reimbursement of expenses incurred by the date that is forty-five (45) days after the Effective Date, (ii) shall be paid in full from the Debtors' or Reorganized Debtors' Cash on hand in such amounts as are allowed by the Bankruptcy Court (a) upon the later of (i) the Effective Date, (ii) the date upon which the order relating to any such Allowed Administrative Expense Claim is entered, or (b) upon such other terms as may be mutually agreed upon between the Holder of such an Allowed Administrative Expense Claim and the Debtors or the Reorganized Debtors.