

SCHEDULE A

DOCUMENT REQUESTS PURSUANT TO BANKRUPTCY RULE 2004

Pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure, Linconshire Campus, LLC, Naperville Campus, LLC, Monarch Landing, Inc., and Sedgbrook, Inc. (collectively referred to herein as the “Debtors”), hereby request that Wells Fargo Bank National Association (“Wells Fargo” or the “Bond Trustee”) designate one or more officers, directors, or other representatives with personal knowledge of the Bond Trustee’s financial condition and business activities for examination by the Debtors and produce all documents responsive to the following Requests for Production of Documents (collectively, the “Discovery Requests”). Each of the Discovery Requests is to be answered fully and separately, in writing and under oath, and provided to the offices of DLA Piper LLP (US), Attn: Thomas R. Califano. These Discovery Requests are continuing and each and all answers and responses must be supplemented in accordance with the Federal Rules of Bankruptcy Procedure.

DEFINITIONS AND INSTRUCTIONS

I. Definitions.

The following definitions apply to each of the Discovery Requests set forth herein and are deemed to be incorporated in each of said Discovery Requests.

- A. “Debtors” shall mean the debtors in the above-captioned bankruptcy proceeding.
- B. “Wells Fargo” shall mean Wells Fargo Bank National Association.
- C. “Bond Trustee” shall mean Wells Fargo Bank National Association.
- D. “Monarch” shall mean the real property and improvements known as the “Monarch Landing Campus,” located in and around 2255 Erickson Drive, in Naperville, Illinois.
- E. “Bonds” shall mean the municipal bond offerings secured by Monarch or Sedgbrook in favor of the Bond Trustee.

- F. “ERC Plan” shall mean the Fourth Amended Joint Plan of Reorganization under Chapter 11 of the Bankruptcy Code approved in In re Erickson Retirement Communities, Case No. 09-37010 (SGJ) (N.D. Tex. 2010).
- G. “You” and “Your” means the Bond Trustee, individually and collectively, and their respective attorneys, agents, employees, consultants, accountants, private investigators and any other representative as the context may require.
- H. “Court” shall mean the United States Bankruptcy Court for the Northern District of Texas.
- I. “Document” or “Documents” is synonymous in meaning and scope to the usage of the term in Federal Rules of Civil Procedure 34(a), and includes, but is not limited to, writings, drawings, graphs, charts, photographs, video or audio recordings, facsimile transmissions, or other data compilations, from which any intelligence can be perceived or information can be obtained, with or without the use of detection devices (including all non-identical drafts, copies or reproductions thereof), including information stored electronically in computer or any media, which are in your possession, custody or control.
- J. “All Documents” shall mean every document within the custody, possession or control of the person or entity to whom a Discovery Request is directed, and/or its attorneys, representatives, employees, and/or agents, whether an original or copy, as defined above, known to you and every such document or writing which you can locate or discover by reasonably diligent efforts.
- K. “Concerning” shall mean relating to, referring to, regarding, describing, evidencing or constituting.
- L. The singular includes the plural and the plural includes the singular. The masculine includes the feminine and the neutral genders.
- M. “And” shall mean and/or.
- N. “Or” shall mean and/or.
- O. “Including” means “including, but not limited to.”
- P. The phrases following “including” are intended to illustrate the kinds of matters that we believe are responsive to the Discovery Request. Such examples are not intended to be exhaustive of the materials sought and shall not in any way be read to limit the scope of the Discovery Request.
- Q. The term “relate” or “relate to” or “relating to” as used herein mean refer to, summarize, reflect, constitute, contain, embody, mention, show,

comprise, evidence, discuss, establish, describe, comment upon, reflect, identify, state, or in any way relevant to the subject matter stated.

II. Instructions.

1. These Discovery Requests shall be deemed to be continuing in nature and require any responses to these requests, including any documents or tangible things provided pursuant to these Discovery Requests, which are later found to be incorrect or incomplete, or to have been incorrect or incomplete because of changed circumstances, to be corrected and completed by means of supplementary responses. Unless otherwise specified, each Discovery Request calls for documents, or tangible things, through the date on which the response is served.
2. If a claim of privilege is asserted to any document or tangible thing requested to be produced herein, such documents shall be sufficiently described in connection with such claim. A document or tangible thing is sufficiently described for this purpose if the following information is provided:
 - (a) The nature of the privileged claim;
 - (b) In the case of a document, the approximate date on which the document was prepared, its title, the type of document (e.g., letter, memo, etc.) and its author;
 - (c) In the case of a tangible thing, the date the thing came into Your possession and the generic or trade name of the thing;
 - (d) The name and position of each person, other than attorneys representing You in connection with this lawsuit, to whom the contents of the document or the characteristics of the tangible thing have been communicated by copy, exhibition, reading or substantial summarization; and
 - (e) A brief description or summary of the contents and/or characteristics of the document or tangible thing sufficient to explain the subject matter and the privilege involved.
3. The documents and tangible things produced pursuant to the Discovery Requests shall be segregated according to the paragraphs and subparagraphs pursuant to which they are produced.
4. If any document or tangible thing requested was, but no longer is, in Your possession or subject to Your custody or control or was, but no longer is, in existence, state the following:

- (a) Whether it is missing or lost;
 - (b) Whether it has been destroyed;
 - (c) Whether it has been transferred, voluntarily or involuntarily to others; and
 - (d) Whether it has been disposed of otherwise.
5. With respect to each such document, explain the circumstances surrounding such disposition, identify each person directly or immediately authorizing same and the date(s) thereof. Identify each document by listing its author and the author's address, the type of document (e.g., letter, memo, etc.); its date and subject matter, its present location and custodian, and whether the document or any copy thereof is still in existence.
6. These Requests are directed at You with respect to documents in Your possession or custody or subject to Your control. You have an obligation and duty to respond fully and separately as to each of the following Requests.
7. With respect to any document that is requested pursuant to a Request for Production of Documents, each document that is attached by staple, clip, or otherwise to a document, the production of which is requested herein, shall also be produced (attached in the same manner as the original) regardless of whether production of that document is otherwise requested herein.
8. If more than one copy of any requested document is in Your possession, custody or control, produce each copy that in any way differs from any other copy, including, without limitation, differences caused by writings placed thereon by any person, numbers of pages comprising the document, or documents attached thereto by staple, clip or otherwise.
9. Unless another timeframe is provided in a specific Request, information and/or documents from January 1, 2010 to June 15, 2010 should be produced.

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 1:

All documents concerning the value of any of the Debtors' assets.

REQUEST FOR PRODUCTION NO. 2:

All documents concerning any efforts to market the property or assets of any of the Debtors.

REQUEST FOR PRODUCTION NO. 3:

All documents concerning any demand for payment by the Bond Trustee relating to the Bonds.

REQUEST FOR PRODUCTION NO. 4:

All documents that refer or relate to the Bond Trustee's acquiescence or agreement to the terms of the ERC Plan.

REQUEST FOR PRODUCTION NO. 5:

All documents that refer or relate to the Bond Trustee's efforts to collect payments relating to the Bonds.

REQUEST FOR PRODUCTION NO. 6:

All documents concerning any of the Debtors' reserve funds which the Bond Trustee may have set off.

REQUEST FOR PRODUCTION NO. 7:

All documents that refer or relate to communications between the Bond Trustee and any holders of Bonds relating to the Bonds.

REQUEST FOR PRODUCTION NO. 8:

All documents that refer or relate to communications between the Bond Trustee and the Debtors relating to the Bonds.

REQUEST FOR PRODUCTION NO. 9:

All documents concerning the payment of the Bond Trustee's professional fees from escrow accounts of the Debtors.

REQUEST FOR PRODUCTION NO. 10:

All documents concerning property condition assessment for the Debtors' properties.

REQUEST FOR PRODUCTION NO. 11:

All documents concerning Phase 1 environmental reports for the Sedgebrook campus.