

# Exhibit A

## List of Causes of Action

In accordance with section 1123(b)(3) of the Bankruptcy Code and except as otherwise provided in the Plan, the Debtors shall transfer to, and the Liquidation Trust shall receive and retain and may, in its sole discretion, enforce or prosecute all Causes of Action, including those set forth in the Plan and identified in this exhibit to the Plan, but excluding any Released KPN Claims, Claims against RFC or RFC-Related Entities, and any Causes of Action and Claims settled and compromised by the Debtors prior to the Effective Date. The Liquidation Trust, in its sole and absolute discretion, will determine whether to bring, settle, release, compromise, or enforce such rights (or decline to do any of the foregoing). The Liquidation Trust or any successor may prosecute (or decline to prosecute) such Causes of Actions in accordance with the best interests of the beneficiaries of the Liquidation Trust or any successors holding such rights of action. Except as otherwise provided herein, the failure of the Debtors to specifically list any Cause of Action, Claim, right of action, suit or proceeding does not, and will not be deemed to, constitute a waiver or release by the Debtors or the Liquidation Trust of such claim, right of action, suit or proceeding, and the Liquidation Trust will receive and retain the right to pursue such claims, rights of action, suits or proceedings in its sole discretion and, therefore, no preclusion doctrine, collateral estoppel, issue preclusion, claim preclusion, estoppel (judicial, equitable or otherwise) or laches will apply to such cause of action, claim, right of action, suit or proceeding upon or after the confirmation or consummation of the Plan.

For the avoidance of any confusion, in addition to the Causes of Action and Claims set forth in the Plan, the Debtors will transfer to and the Liquidation Trust shall expressly retain:

1. Any and all Claims, Causes of Action, rights of action, suits, and proceedings in favor of the Debtors arising under Chapter 5 of the Bankruptcy Code, and other similar avoidance actions available under applicable non-bankruptcy law, or any other provisions of the Bankruptcy Code, excluding any Released KPN Claims, Claims against RFC or RFC-Related Entities, and any Causes of Action and Claims settled and compromised by the Debtors prior to the Effective Date;
2. Claims and Causes of Action against the Illinois Wetlands Development, Inc.;
3. Claims and Causes of Action against any village, municipality or third party, including but not limited to the Village of Antioch and North Shore Gas, for any and all (a) deposits, fees or refunds of every kind or nature prepaid by or payable to the Debtors, (b) recapture, repayment, assessment and other rights, remedies and defenses, and (c) impact, connection and tap-on fees;
4. Claims and Causes of Action against any village, municipality or third party, including but not limited to the Village of North Aurora, with respect to proceeds of or amounts drawn under letters of credit issued by the Debtors' lenders or on behalf of the Debtors.
5. All claims of the Debtors in the following litigation:

MAIN CASE DOCKET NO.	ADVERSARY PROCEEDING	DEFENDANT	CAUSE OF ACTION
1944	09-01056	City of Kenosha, Wisconsin	Turnover of Estate Property and to Avoid and Recover Preferential Transfers
1945	09-01057	City of Lockport, Illinois	Turnover of Estate Property
1946	09-01058	Village of Carpentersville, Illinois	Turnover of Estate Property
1947	09-01059	Village of Minooka, Illinois	Turnover of Estate Property
1948	09-01060	Village of Round Lake Heights, Illinois	Turnover of Estate Property
1949	09-01061	Village of Wauconda, Illinois	Turnover of Estate Property
1950	09-01062	City of Naperville, Illinois	Turnover of Estate Property and to Avoid and Recover Preferential Transfers
1951	09-01063	Woodstock Community Unit School District 200	Turnover of Estate Property
1952	09-01064	Oswego Community School District	Turnover of Estate Property and to Avoid and Recover Preferential Transfers
1953	09-01065	Parker Water and Sanitation District	Turnover of Estate Property
1954	09-01066	School District No. 34 Antioch, Illinois	Turnover of Estate Property and to Avoid and Recover Preferential Transfers
1955	09-01067	Town of Firestone, Colorado	Turnover of Estate Property

MAIN CASE DOCKET NO.	ADVERSARY PROCEEDING	DEFENDANT	CAUSE OF ACTION
1956	09-01068	Village of Hanover Park, Illinois	Turnover of Estate Property
1957	09-01069	Village of Wonder Lake, Illinois	Turnover of Estate Property
1958	09-01070	City of Aurora, Colorado	Turnover of Estate Property and to Avoid and Recover Preferential Transfers
1959	09-01071	Town of Cortland, Illinois	Turnover of Estate Property
1960	09-01072	Village of Oswego, Illinois	Turnover of Estate Property and to Avoid and Recover Preferential Transfers
1961	09-01073	Commonwealth Edison Company	Avoid and Recover Preferential Transfers
1962	09-01075	Nextel Retail Stores, LLC, d/b/a Sprint	Avoid and Recover Preferential Transfers
1963	09-01076	SBC Internet Services, Inc.	Avoid and Recover Preferential Transfers
1964	09-01077	AT&T Corporation	Avoid and Recover Preferential Transfers
1965	09-01078	Neu Towne Parker Metro District	Avoid and Recover Preferential Transfers
1966	09-01079	Minooka High School District No. 111, Minooka, Illinois	Turnover of Estate Property and to Avoid and Recover Preferential Transfers
1967	09-01080	Village of Gilberts, Illinois	Turnover of Estate Property
1968	09-01081	School District U-46, Elgin, Illinois	Turnover of Estate Property and to Avoid and Recover Preferential Transfers

MAIN CASE DOCKET NO.	ADVERSARY PROCEEDING	DEFENDANT	CAUSE OF ACTION
1969	09-01082	Hanover Park Park District, Illinois	Turnover of Estate Property and to Avoid and Recover Preferential Transfers
1970	09-01083	Village of Sturtevant, Wisconsin	Turnover of Estate Property
1971	09-01084	Minooka, Illinois School District No. 201	Turnover of Estate Property and to Avoid and Recover Preferential Transfers
1972	09-01085	Village of Grayslake, Illinois	Turnover of Estate Property
1973	09-01087	City of Aurora, Illinois	Turnover of Estate Property; Avoid and Recover Preferential Transfers; Unjust Enrichment and Breach of Contract
1974	09-01088	City of Joliet, Illinois	Turnover of Estate Property; Avoid and Recover Preferential Transfers; Unjust Enrichment and Breach of Contract
1975	09-01090	Village of Antioch, Illinois	Turnover of Estate Property; Avoid and Recover Preferential Transfers; Unjust Enrichment and Breach of Contract
1976	09-01091	Cavalli-Dotson Ventures I, LLC, Best Buy Homes Colorado, Inc., Richard Cavalli, and Bailey Dotson	Breach of Contract; Unjust Enrichment; Equitable Lien and Alter Ego
1990	09-01122	Middlesboro at Oakhurst, LLC	Avoid and Recover Fraudulent Transfers

<b>MAIN CASE DOCKET NO.</b>	<b>ADVERSARY PROCEEDING</b>	<b>DEFENDANT</b>	<b>CAUSE OF ACTION</b>
		Tadian Entities (as defined in the KPN Settlement Agreement)	Potential Causes of Action not yet filed