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COUNSEL FOR THE DEBTORS

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	
	§	Chapter 11
	§	
THE LASALLE GROUP, INC., et al.,¹	§	Case No. 19-31484-sgj-11
	§	
DEBTORS.	§	(Jointly Administered)
	§	
	§	
	§	
	§	

NOTICE OF (1) FINAL HEARING ON APPROVAL OF THE JOINT DISCLOSURE STATEMENT, (2) HEARING ON CONFIRMATION OF THE PLAN, (3) DEADLINE AND PROCEDURES FOR FILING OBJECTIONS TO CONFIRMATION OF THE PLAN, (4) VOTING RECORD DATE, (5) VOTING DEADLINE FOR RECEIPT OF BALLOTS, AND (6) DEADLINE BY WHICH GOVERNMENTAL ENTITIES MUST FILE PROOFS OF CLAIM

TO ALL CREDITORS OF CINCO RANCH MEMORY CARE, LLC AND PEARLAND MEMORY CARE, LLC:

PLEASE TAKE NOTICE that Cinco Ranch Memory Care, LLC (“Cinco Ranch”) and Pearland Memory Care, LLC (“Pearland,” and collectively with Cinco Ranch, the “Debtors”), debtors and debtors-in-possession in the above-captioned bankruptcy cases, are soliciting acceptances of that certain *Debtors’ First Amended Joint Chapter 11 Plan of Liquidation* (as

¹ A list of the Debtors in these Chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, is attached hereto as **Schedule 1**. The Debtors’ mailing address is 1900 Enchanted Way, Ste. 200, Grapevine, TX 76051.

may be amended, the “Plan”), from holders of impaired claims who are (or may be) entitled to receive distributions under the Plan.

PLEASE TAKE FURTHER NOTICE that on December 31, 2019, the Bankruptcy Court entered an order (the “Conditional Order”) conditionally approving the *First Amended Disclosure Statement in Support of Debtors’ Joint Chapter 11 Plan of Liquidation* (the “Disclosure Statement”) relating to the Plan. The Bankruptcy Court will consider final approval of the Disclosure Statement on **February 13, 2020 at 9:30 a.m. (Prevailing Central Time)** (the “Final Disclosure Statement Hearing”).

PLEASE TAKE FURTHER NOTICE that the hearing to consider confirmation of the Plan (the “Confirmation Hearing”) will be held on **February 13, 2020 at 9:30 a.m. (Prevailing Central Time)**, simultaneously with the Final Disclosure Statement Hearing, or as soon thereafter as counsel can be heard, before the Honorable Stacey G.C. Jernigan for the United States Bankruptcy Court for the Northern District of Texas, Dallas Division, Earle Cabell Federal Building, 1100 Commerce Street, Room 1, Dallas, Texas, 75242-1496. The Confirmation Hearing may be continued from time to time by announcing such continuance in open court should further time be required, and the Plan may be further modified, if necessary, pursuant to 11 U.S.C. § 1127 prior to, during, or as a result of the Confirmation Hearing, without further notice to parties-in-interest.

PLEASE TAKE FURTHER NOTICE that pursuant to the Conditional Order, **January 31, 2020 at 5:00 p.m. (Prevailing Central Time)**, shall be the last date and time for filing and serving objections to the Disclosure Statement and/or confirmation of the Plan (the “Objection Deadline”). To be considered, objections, if any, must (a) be in writing, (b) comply with the Federal Rules of Bankruptcy Procedure and the Bankruptcy Rules for the United States Bankruptcy Court for the Northern District of Texas, (c) set forth the name of the objector and the nature and amount of any claim or interest asserted by the objector against or in the Debtors, their estates, or their properties, (d) state with particularity the legal and factual bases for the objection, including suggested language to be added or existing language to be amended or deleted, and (e) be filed with the Court together with proof of service and served by personal service, overnight delivery, first class mail, or facsimile, so as to be **RECEIVED** no later than the Objection Deadline by the following (collectively, the “Notice Parties”):

Vickie L. Driver
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2525 McKinnon St., Suite 425
Dallas, Texas 75201

*Counsel for Cinco Ranch Memory Care, LLC and
Pearland Memory Care, LLC*

Objections not timely filed and served in the matter set forth above shall not be considered and shall be deemed overruled.

PLEASE TAKE FURTHER NOTICE that pursuant to the terms of the Conditional Order, December 31, 2019 shall be the record date for determining the creditors entitled to vote to accept or reject the Plan (the “Voting Record Date”).

PLEASE TAKE FURTHER NOTICE that if you hold a claim against either Debtor as of the Voting Record Date and are entitled to vote to accept or reject the Plan, a form of ballot and voting instructions appropriate to your claim are included herewith. For your vote to be counted, ballots to accept or reject the Plan must be executed, completed and **RECEIVED** by **February 6, 2020 (Prevailing Central Time) on 5:00 p.m.** (the “Voting Deadline”), by Donlin Recano & Company, Inc. (the “Voting Agent”) at the address below:

If by Electronic Mail:

Ballots may also be delivered to Claims and Balloting Agent by electronic mail sent to: DRCVote@donlinrecano.com with “LaSalle Vote” on the subject line.^[1]

If by Overnight Courier, Messenger, or Hand Delivery:

Donlin, Recano & Company, Inc.
Re: The LaSalle Group, Inc. et al.
Attn: Voting Department
6201 15th Ave.
Brooklyn, NY 11219

If by First Class Mail:

Donlin, Recano & Company, Inc.
Re: The LaSalle Group, Inc. et al.
Attn: Voting Department
P.O. Box 199043
Blythebourne Station
Brooklyn, NY 11219

BALLOTS THAT ARE NOT RECEIVED BY THE VOTING DEADLINE WILL NOT BE COUNTED.

PLEASE TAKE FURTHER NOTICE that any party-in-interest wishing to obtain information about the solicitation procedures and copies of the Disclosure Statement, the Plan, or any exhibits thereto, may request such information or copies by contacting the Voting Agent at the above address. All documents that are filed with the Bankruptcy Court may be reviewed (during regular business hours) at the United States Bankruptcy Court for the Northern District of Texas, Dallas Division, Earle Cabell Federal Building, 1100 Commerce Street, Room 1, Dallas, Texas, 75242-1496 or may be viewed online at <http://www.txnb.uscourts.gov>. All documents filed in the Debtors’ cases may be viewed free of charge online at <https://donlinrecano.com/lasalle>.

^[1] For any Ballot cast via electronic mail the format of the attachment must be found in the common workplace and industry standard format (i.e., industry-standard PDF file) and the received date and time in the Claims and Balloting Agent’s inbox will be used as the timestamp for receipt.

PLEASE TAKE FURTHER NOTICE that **January 31, 2020** is established as the deadline for governmental entities to file proofs of claim against the Debtors, and the deadline for all other entities to file proofs of claim has previously been established as September 9, 2019.

Dated: January 6, 2020

CROWE & DUNLEVY, P.C.

By: /s/ Christina W. Stephenson

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COUNSEL FOR DEBTORS

Schedule 1
List of Debtors

#	Debtor Name	Case No.	EIN
1	The LaSalle Group, Inc.	19-31484	0143
2	West Houston Memory Care, LLC	19-31485	2760
3	Cinco Ranch Memory Care, LLC	19-31486	2716
4	Pearland Memory Care, LLC	19-31488	5311
5	Riverstone Memory Care, LLC	19-31493	5407