




CLERK, U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF TEXAS

ENTERED

THE DATE OF ENTRY IS ON
THE COURT'S DOCKET

The following constitutes the ruling of the court and has the force and effect therein described.

Signed December 31, 2019


United States Bankruptcy Judge

**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)
	§	
	§	
	§	
	§	
	§	

ORDER GRANTING DEBTORS' MOTION FOR ORDER TO (1) CONDITIONALLY APPROVE THE DISCLOSURE STATEMENT, (2) APPROVE FORM OF NOTICE OF COMBINED HEARING ON FINAL APPROVAL OF THE DISCLOSURE STATEMENT AND CONFIRMATION OF THE PLAN, (3) ESTABLISH PROCEDURES FOR VOTING ON THE PLAN, (4) FIX DATE FOR RETURNING ACCEPTANCES OR REJECTIONS OF THE PLAN, (5) FIX DATE FOR FILING OBJECTIONS TO THE DISCLOSURE STATEMENT AND CONFIRMATION, (6) SET DEADLINES BY WHICH GOVERNMENTAL ENTITIES MUST FILE PROOFS OF CLAIM, AND (7) SET HEARING ON FINAL APPROVAL OF THE DISCLOSURE STATEMENT AND CONFIRMATION OF THE PLAN

This Court, having acted upon and considered the conditional approval and other relief

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.

requested by 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, with regard to that certain *Disclosure Statement in Support of Debtors’ Joint Chapter 11 Plan of Reorganization* (as the same may be amended, modified, or supplemented from time to time, the “Disclosure Statement”) and the *Debtors’ Joint Chapter 11 Plan of Reorganization* (as the same may be amended, modified, or supplemented from time to time, the “Plan”), finds that the Disclosure Statement should be conditionally approved and the other relief specifically set forth in this Order granted. The Court further finds and concludes that the procedures for transmission of the Disclosure Statement, the approval of the form of notice, the procedures with respect to voting and confirmation of the Plan, and the other matters set forth in this Order are appropriate and should be approved pursuant to Section 105(d)(2)(vi) of Title 11 of the United States Code (the “Bankruptcy Code”) and therefore

It is hereby **ORDERED** that:

1. The Disclosure Statement, with any amendments stated on the record at the hearing, is **CONDITIONALLY APPROVED** subject to final approval after notice and a hearing.

2. A combined hearing on final approval of the Disclosure Statement (the “Final Disclosure Statement Hearing”) and confirmation of the Plan (the “Confirmation Hearing”) is hereby set for **February 13, 2020 at 9:30 a.m. (Prevailing Central Time)**, which hearing may be adjourned or continued to a different date without further notice, other than notice given in open court at such hearing.

3. The form of the notice of the Final Disclosure Statement Hearing and Confirmation Hearing attached hereto as **Exhibit A** and incorporated herein by reference (the “Notice”) is hereby **APPROVED**.

4. The record date for determining creditors and other parties-in-interest entitled to receive a Solicitation Package (as defined herein) and to vote on the Plan shall be December 31, 2019 (the “Voting Record Date”).

5. The form of ballots attached hereto as **Exhibit B** and incorporated herein by reference (the “Ballots”) is **APPROVED** for distribution to creditors and parties-in-interest entitled to vote on the Plan.

6. The following materials shall constitute the solicitation package (the “Solicitation Package”):

- a. the Disclosure Statement (including the Plan and all exhibits attached thereto);
- b. a copy of the Notice;
- c. a copy of this Order (with exhibits intentionally omitted);
- d. the applicable form of Ballot, as applicable; and
- e. any additional documents that the Court has ordered to be made available.

7. The Disclosure Statement, Plan and this Order (without exhibits), and all other contents of the Solicitation Package, including Ballots, shall be provided in paper format.

8. No later than five (5) business days after the entry of this Order, the Debtors shall serve, or cause to be served, all of the materials in the Solicitation Package upon all holders of Claims in the Voting Classes² who are entitled to vote on the Plan. Additionally, the Debtors shall serve or caused to be served, all of the materials in the Solicitation Package (excluding the Ballots) on all parties listed on the Master Service List, including the Internal Revenue Service and the United States Trustee. Finally, the Debtors shall serve or cause to be served, the Notice, upon (a) all creditors not entitled to vote; (b) all equity security holders, as of the Voting Record

² Voting Classes are defined as Classes 1.1, 1.2, 2.1, 2.2, 2.3, and 2.4.

Date; and (c) all former employees of the Debtors listed on the Debtors' schedules (collectively, the "Notice Parties"). The Debtors are excused from re-distributing Solicitation Packages that are returned marked "undeliverable as addressed," "Moved – left no forwarding address," "forwarding order expired" or similar marking or reason, unless the Debtors have been informed in writing by such person of that person's new address.

9. The date and time by which all Ballots must be received for tabulation is **5:00 p.m. (Prevailing Central Time) on February 6, 2020** (the "Voting Deadline"). All ballots must be properly, executed, completed, and the original thereof shall be mailed, hand-delivered, delivered by overnight courier so as to actually received by the Voting Deadline to be counted.

10. No Ballots received after the Voting Deadline shall be counted or otherwise included in the tabulation of acceptances and rejections of the Plan without further Court order. Further, the following Ballots shall not be counted in determining the acceptance or rejection of the Plan: (i) any Ballot that is illegible or contains insufficient information to permit the identification of the holder of such Claim; (ii) any Ballot cast by any Entity that does not hold a Claim in a Voting Class; (iii) any Ballot cast for a Claim scheduled as unliquidated, contingent, or disputed for which no Proof of Claim was timely filed, provided that if the applicable Claims Bar Date has not expired prior to the Voting Record Date, a Claim listed in the Schedules as contingent, disputed, or unliquidated shall be allowed to vote only in the amount of \$1.00; (iv) any unsigned Ballot or Ballot lacking an original signature; (v) any Ballot not marked to accept or reject the Plan or marked both to accept and reject the Plan; (vi) any Ballot submitted by any Entity not entitled to vote pursuant to the procedures described herein; and (vii) any Ballot transmitted by facsimile (fax), e-mail, or other electronic means.

11. The Debtors may make administrative, non-substantive modifications to the Disclosure Statement and the Plan at or prior to the Confirmation Hearing upon notice to the Notice Parties.

12. If a holder of a Claim casts more than one Ballot voting the same Claim(s) prior to the Voting Deadline, the latest dated, properly executed Ballot received before the Voting Deadline will be deemed to reflect the claimant's intent and supersede any prior ballots. If a holder of Claim casts Ballots that are dated as of the same day, but which are voted inconsistently, such Ballots will not be counted. A holder of a claim must vote all of its claim within a particular class either to accept or reject the Plan and may not split its vote, and any Ballot that partially rejects and partially accepts the Plan will not be counted.

13. To the extent possible, the Debtors shall mail each voting claimant a single Ballot on behalf of all claims held by such claimant in a particular class of claims.

14. If a party that is entitled to vote has more than one Claim within the same Class against one or more of the Debtors based upon different transactions, such party shall be entitled to one vote for numerosity purposes in the aggregate dollar amount of all of said Claims for each Debtor against which such party holds a Claim.

15. If any objection to Claims for voting purposes is filed under/or a Rule 3018 Motion is timely filed, the Ballot in question shall be counted for voting purposes only (a) in the amount established in an order entered by the Court; (b) in the amount agreed to by the Debtors and the affected creditor; or (c) in the absence of a Court order or consensual agreement, in the amount equal to the preprinted amount on the Ballot.

16. The method of delivery of Ballots to be sent to the Voting Agent is at the election and risk of each holder, and except as otherwise provided, a Ballot will be deemed delivered only

when the Voting Agent actually receives the executed Ballot. No Ballot should be sent to the Debtors, the Debtors' agents (other than the Voting Agent), the Debtors' financial or legal advisors, and if so sent will not be counted. Neither the Debtors, nor any other Entity, will be under any duty to provide notification of defects or irregularities with respect to delivered Ballots, nor will any of them incur any liability for failure to provide such notification.

17. In accordance with Section 1126(f) of the Bankruptcy Code, acceptances and rejections will not be solicited from any class that is not impaired under the Plan.

18. The last day for filing and serving objections or comments to the Disclosure Statement and/or confirmation of the Plan is hereby set at 5:00 p.m. (Prevailing Central Time) on January 31, 2020 (the "Objection Deadline"). Any objection, comment, or response to final approval of the Disclosure Statement and/or confirmation of the Plan shall be in writing and shall be filed with the Court and served so that they are received by the Objection Deadline on the following:

Vickie L. Driver
Christina W. Stephenson
CROWE & DUNLEVY, P.C.
2525 McKinnon, St., Suite 425
Dallas, Texas 75201

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

19. To be considered timely, any comments or objections must be actually filed with and received by the Court and the foregoing counsel for the Debtors prior to the Objection Deadline.

20. The Court shall only consider timely-filed written comments or objections and all comments or objections not timely filed and served in accordance with the provisions of this Order shall be deemed to be waived.

21. The deadline for governmental entities to file proofs of claim against the Debtors is **January 31, 2020.**

END OF ORDER

Submitted by:

/s/ Christina Stephenson

Vickie L. Driver

State Bar No. 24026886

Christina W. Stephenson

State Bar No. 24049535

Christopher M. Staine

State Bar No. 24104576

CROWE & DUNLEVY, P.C.

2525 McKinnon St., Suite 425

Dallas, TX 75201

Telephone: 214.420.2163

Facsimile: 214.736.1762

Email: vickie.driver@crowedunlevy.com

Email: christina.stephenson@crowedunlevy.com

Email: christopher.staine@crowedunlevy.com

COUNSEL FOR THE 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

Vickie L. Driver
State Bar No. 24026886
Christina W. Stephenson
State Bar No. 24049535
Christopher M. Staine
State Bar No. 24104576
CROWE & DUNLEVY, P.C.
2525 McKinnon St., Suite 425
Dallas, TX 75201
Telephone: 214.420.2163
Facsimile: 214.736.1762
Email: vickie.driver@crowedunlevy.com
Email: christina.stephenson@crowedunlevy.com
Email: christopher.staine@crowedunlevy.com

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’ Joint Chapter 11 Plan of Liquidation* (as may be amended,

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.

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 [---], the Bankruptcy Court entered an order (the “Conditional Order”) conditionally approving the *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
Christina W. Stephenson
CROWE & DUNLEVY, P.C.
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, May 2, 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: December 31, 2019

CROWE & DUNLEVY, P.C.

By: /s/ Christina W. Stephenson

Vickie L. Driver

State Bar No. 24026886

Christina W. Stephenson

State Bar No. 24049535

Christopher M. Staine

State Bar No. 24104576

2525 McKinnon St., Suite 425

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Telephone: 214.420.2163

Facsimile: 214.736.1762

Email: vickie.driver@crowedunlevy.com

Email: christina.stephenson@crowedunlevy.com

Email: christopher.staine@crowedunlevy.com

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

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

In re: THE LASALLE GROUP, INC., et al.,¹ <p style="text-align: center;">DEBTORS.</p>	§ § § § § § § § § §	Chapter 11 Case No. 19-31484-sgj-11 (Jointly Administered)
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**CLASS [---] BALLOT FOR ACCEPTING OR REJECTING THE DEBTORS’
JOINT CHAPTER 11 PLAN OF REORGANIZATION**

**THE VOTING DEADLINE BY WHICH YOUR BALLOT MUST BE ACTUALLY RECEIVED IS
FEBRUARY 6, 2020 at 5:00 P.M. (CENTRAL TIME) (THE “VOTING DEADLINE”).**

**IF YOUR BALLOT IS NOT ACTUALLY RECEIVED BY THE VOTING DEADLINE, OR IS NOT
COMPLETED IN ACCORDANCE WITH THE INSTRUCTIONS SET FORTH IN THIS BALLOT,
THE VOTE REPRESENTED BY YOUR BALLOT WILL NOT BE COUNTED.**

**YOU HAVE A RIGHT TO AND SHOULD CONSULT AN ATTORNEY BEFORE COMPLETING
THIS BALLOT.**

Cinco Ranch Memory Care, LLC (“Cinco Ranch”) and Pearland Memory Care, LLC (“Pearland,” and collectively with Cinco Ranch (the “Debtors”) filed the *Disclosure Statement in Support of Debtors’ Joint Chapter 11 Plan of Liquidation* (as the same may be amended, modified, or supplemented from time to time, the “Disclosure Statement”) and the *of Debtors’ Joint Chapter 11 Plan of Liquidation* (as the same may be amended, modified, or supplemented from time to time, the “Plan”).²

The United States Bankruptcy Court for the Northern District of Texas (the “Court”) conditionally approved the Disclosure Statement as containing adequate information pursuant to § 1125 of the Bankruptcy Code, as well as certain procedures and materials for the solicitation of votes to accept or reject the Plan, pursuant to an Order dated [---] (the “Solicitation Procedures Order”). The Court’s approval does not indicate approval of the Plan by the Court.

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.

² Capitalized terms not defined herein shall have the meanings ascribed to them in the Plan.

You should review the Plan and Disclosure Statement before you vote. You should seek legal advice concerning the Plan and your classification and treatment under the Plan. You have a Claim in the Chapter 11 Case of [---]. Your Claim has been placed in Class [---] under the Plan. If you hold Claims in more than one class, you will receive a ballot for each class in which you are entitled to vote.

If your ballot is not received by the Voting Agent on or before 5:00 p.m. (Central Time) on February 6, 2020, your vote will not count as either an acceptance or rejection of the Plan.

If the Plan is confirmed by the Court, it will be binding on you whether or not you vote.

Voting Information and Instructions for Completing the Ballot

1. Ballots must be mailed via first class mail (or the enclosed reply envelope), hand-delivered, or delivered by overnight courier so that they are received by the Voting Agent on or before **5:00 p.m. (Central Time) on February 6, 2020** (the “Voting Deadline”) at the following address:

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

If the ballot is received after the Voting Deadline, it will not be counted, notwithstanding any postmark or courier report that indicates it was sent prior to the Voting Deadline. **Any Ballot transmitted by facsimile (fax), e-mail, or other electronic means will not be counted.**

2. If neither the “accept” nor “reject” box is checked or if both the “accept” and “reject” boxes are checked, an otherwise properly completed, executed, and timely returned ballot will not be counted as a vote for or against the Plan for purposes of determining whether the class accepts or rejects the Plan. **Only creditors or their counsel may vote unless a properly executed, specific,**

^[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.

written power of attorney or court order authorizing the signatory to execute the ballot is submitted with this ballot evidencing such creditor's intention to have such other person complete the ballot on the creditor's behalf. **Failure to attach such documentation, if required, will result in this ballot not being counted.** Additionally, the following ballots will not be counted:

- a. any ballot that partially rejects and partially accepts the Plan;
 - b. Ballots sent to the Debtors, the Debtors' agents (other than the Voting Agent), or the Debtors' financial or legal advisors;
 - c. any ballot that is illegible or contains insufficient information to permit the identification of the holder of the Claim;
 - d. any ballot cast by an Entity that does not hold a Claim in Class [---];
 - e. any ballot submitted by a holder not entitled to vote pursuant to the Plan;
 - f. any unsigned ballot; and/or
 - g. any non-original ballot.
3. The method of delivery of ballots to the Voting Agent is at the election and risk of each holder of a Class [---] Claim. Except as otherwise provided herein, such delivery will be deemed made only when the Voting Agent *actually receives* the originally executed ballot. In all cases, holders should allow sufficient time to assure timely delivery. The ballot does not constitute, and will not be deemed, a Proof of Claim or an assertion of a Claim.
 4. If you cast more than one ballot voting the same Claim(s) prior to the Voting Deadline, the latest dated, properly executed ballot received before the Voting Deadline will be deemed to reflect your intent and supersede any prior ballots. If you cast ballots that are dated as of the same day, but which are voted inconsistently, such ballots will not be counted.
 5. You must vote all of your Claims within Class [---] either to accept or reject the Plan and may not split your vote. Further, if a holder has multiple Claims within Class [---], the Debtors may, in their discretion, aggregate the Claims of any particular holder with multiple Claims within Class [---] for the purpose of counting votes.
 6. If a holder of Claims within Class [---] identifies a claim amount on its ballot that is less than the amount otherwise calculated in accordance with these Tabulation Rules, the Claim will be temporarily allowed for voting purposes in the lesser amount identified on such ballot.
 7. If you received a damaged ballot, have lost your ballot, or if you have any questions concerning this ballot or the voting procedures, please call or email the Debtors' Voting Agent, Donlin Recano & Company, Inc. at (212) 771-1128 or DRCVote@DonlinRecano.com. The Debtors' Voting Agent is not authorized to provide, and will not provide, legal or financial advice.

Ballot Signature Page

READ THE ATTACHED VOTING INFORMATION AND INSTRUCTIONS BEFORE COMPLETING THIS BALLOT

COMPLETE ALL ITEMS BELOW. IF THIS BALLOT IS NOT SIGNED ON THE APPROPRIATE LINES, THIS BALLOT WILL NOT BE VALID OR COUNTED AS HAVING BEEN SUBMITTED.

Item 1: Vote on Plan

The undersigned, the holder of a Class [---] Claim against [---] in the amount of \$_____.

ACCEPTS THE PLAN

REJECTS THE PLAN

By signing this ballot, the undersigned acknowledges receipt of the Plan and Disclosure Statement and the other applicable solicitation materials and certifies that the undersigned is the claimant or has the power and authority to vote to accept or reject the Plan on behalf of the claimant. The undersigned understands that an otherwise properly completed, executed, and timely returned ballot that does not indicate either acceptance or rejection of the Plan, or indicates both acceptance and rejection of the Plan, will not be counted as having been cast. The undersigned further understands that, if this ballot is otherwise validly executed but is not timely submitted, this ballot will not be counted as having been cast.

Name of Creditor: _____

Dated: _____

Claim Number: _____

Address: _____

Signature: _____

Title/Capacity: _____

Telephone: _____

COMPLETE, SIGN, AND DATE THIS BALLOT AND RETURN TO THE FOLLOWING ADDRESS BY FEBRUARY 6, 2020 AT 5:00 P.M. CENTRAL TIME:

If by first class mail:

If by courier or hand delivery:

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

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

Schedule 1
List of Debtors

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