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PROPOSED ATTORNEYS FOR DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

In re: § **Chapter 11**
§
THE LASALLE GROUP, INC., et al.,¹ § **Case No. 19-31484**
§
Debtors. § **(Joint Administration Requested)**

**REQUEST FOR EMERGENCY CONSIDERATION
OF CERTAIN "FIRST DAY" MATTERS**

On May 2, 2019, the LaSalle Group, Inc., debtors and debtors-in-possession (the “Debtors”), debtors-in-possession in the above-referenced chapter 11 cases filed a petition for relief under Chapter 11 of the Bankruptcy Code. Counsel for the Debtors believes that the cases qualify as "Complex Chapter 11 Cases." The Debtors need emergency consideration of the following initial case matters:

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 545 E. John Carpenter Freeway, Suite 500, Irving, Texas 75062.

- ✓ Debtors' Emergency Motion for Entry of an Order Authorizing Joint Administration of Chapter 11 Cases Pursuant to Rule 1015(b) of the Federal Rules of Bankruptcy Procedure ("Joint Admin Motion") [Docket No. 6]
- ✓ Debtors' Emergency Motion Pursuant to Sections 105(a), 345(b), 363(c), and 364(a) of the Bankruptcy Code for Authorization to (I) Continue Use of Existing Cash Management System, (II) Maintain Existing Bank Accounts, and (III) Waive Certain Deposit Guidelines (the "Cash Management Motion") [Docket No. 9]
- ✓ Debtors' Emergency Motion for an Order Under 11 U.S.C. §§105, 363, and 507 (I) Authorizing Payment of Pre-Petition Employee Obligations and Related Amounts, (II) Confirming Debtors' Right to Pay Withholding and Payroll-Related Taxes and (III) Directing Banks to Honor Pre-Petition Checks for Employee Obligations (the "Prepetition Wages Motion") [Docket No. 11]
- ✓ Debtors' Emergency Motion for an Interim and Final Order (I) Authorizing the Use of Cash Collateral Pursuant to sections 105, 361, and 363 of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 4001(B) and (II) Granting Adequate Protection to the Pre-petition Secured Lenders (the "Cash Collateral Motion") [Docket No. 8]
- ✓ Debtors' Expedited Motion to Establish Notice Procedures ("Notice Motion") [Docket No.12]

RESPECTFULLY SUBMITTED this 2nd day of May, 2019.

CROWE & DUNLEVY, P.C.

By: /s/ Vickie L. Driver

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**REQUEST FOR EMERGENCY CONSIDERATION OF CERTAIN "FIRST DAY"
MATTERS - PAGE 2**

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CERTIFICATE OF CONFERENCE

I hereby certify that on April 28, 2019, I spoke with Lisa Lambert with the US Trustee's Office regarding the relief requested herein. Ms. Lambert requested an opportunity to review the specific Motion and comment on the specific relief requested herein. Accordingly, we will continue to work with the US Trustee's Office to address any and all concerns in advance of the hearing on this Motion.

/s/ Vickie L. Driver
Vickie L. Driver

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading provided by me to Donlin Recano for service upon the parties listed below via e-mail, facsimile, overnight delivery, and/or courier on this 2nd day of May, 2019. I further certify that Donlin Recano will file a certificate of service with the court verifying service upon the following upon completion.

- (a) The Office of the United States Trustee for the Northern District of Texas
- (c) Counsel to each of the Debtors' pre-petition secured lenders, or if none, the lender itself;
- (d) The 20 largest unsecured creditors for each Debtor regarding which the pleading impacts, unless and until such time as an official committee of unsecured creditors is appointed, if any;
- (e) Counsel to any official committee established in these Chapter 11 Cases pursuant to section 1102 of the Bankruptcy Code, if any;
- (f) The Office of the Attorney General of the State of Texas;
- (g) The United States Attorney's Office for the Northern District of Texas;
- (h) The Internal Revenue Service;
- (i) The Office of Health and Human Services; and
- (j) All parties who have filed a notice of appearance and request for notice or service of all pleadings pursuant to Bankruptcy Rule 2002.

/s/ Vickie L. Driver

Vickie L. Driver

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