

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.
Spaces McKinney Avenue
1919 McKinney Avenue, Suite 100
Dallas, TX 75201
Telephone: 214.420.2163
Facsimile: 214.736.1762
Email: vickie.driver@crowedunlevy.com
Email: crissie.stephenson@crowedunlevy.com
E-mail: christopher.staine@crowedunlevy.com

PROPOSED 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 AGENDA FOR MAY 17, 2019 HEARING

Hearing Date/Time: **May 17, 2019 at 1:30 p.m (CST)**

Hearing Location: Courtroom of the Honorable Stacey G.C. Jernigan,
United States Bankruptcy Court
for the Northern District of Texas, Dallas Division,
Earle Cabell Federal Building,
1100 Commerce St.,
Dallas, Texas 75242

1. 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 [Docket No .8] (the “Cash Collateral Motion”)

Time: 30 minutes

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.

Contested.

Related Documents: Texas Taxing Authorities' Objection to the 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 [Dkt. #32]

Interim Order Authorizing Debtors' Use of Cash Collateral and Providing Partial Adequate Protection [Dkt . # 33]

Status: The Debtors' expect to resolve all objections in advance of hearing.

2. 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]:

Time: 5 minutes

Uncontested.

Related Documents: N/A

Status: Proposed order to be submitted

3. 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]:

Time: 5 minutes

Uncontested.

Related Documents: N/A

Status: Proposed order to be submitted

4. Debtors' Emergency Motion (I) to Authorize Certain Procedures to Maintain the Confidentiality of Resident Information, (II) for Authority to File Under Seal Separate Matrix and Schedule F Containing Resident Information, (III) to Modify Notice to Former

Residents, and (IV) for Relief from Required Form of Mailing Matrix with Regard to Separate Matrix [Docket No. 58]:

Time: 5 minutes
Uncontested.
Related Documents: N/A
Status: Proposed order to be submitted

5. Debtors' Emergency Motion for an Order Under 11 U.S.C. §§ 105(a) and 366 (I) Prohibiting Utility Companies From Altering or Discontinuing Service on Account of Prepetition Invoices, (II) Approving Deposit Account as Adequate Assurance of Payment, and (III) Establishing Procedures for Resolving Requests by Utility Companies for Additional Adequate Assurance of Payment [Docket No. 59]:

Time: 5 minutes
Uncontested.
Related Documents: N/A
Status: Proposed order to be submitted

6. Emergency Motion for Authority to Enter Into and Meet Obligations Under Insurance Premium Finance Agreement [Docket No. 60]:

Time: 5 minutes
Uncontested.
Related Documents: N/A
Status: Proposed order to be submitted.

7. Debtors' Emergency Motion for an Extension of Time to File Schedules of Assets and Liabilities, Schedules of Executory Contracts, and Statements of Financial Affairs [Docket No. 61]:

Time: 5 minutes
Uncontested.
Related Documents: N/A
Status: Proposed order to be submitted.

Dated: May 15, 2019

CROWE & DUNLEVY, P.C.

By: /s/ Christina W. Stephenson

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PROPOSED ATTORNEYS FOR DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was served upon the parties listed on the Limited Service List via e-mail, U.S. Mail, overnight delivery, and/or electronic transmission via the Court's ECF noticing system on this 15th day of May, 2019.

/s/ Christina W. Stephenson

Christina W. Stephenson

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