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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)**

DEBTORS’ WITNESS AND EXHIBIT LIST

Pursuant to Local Rule 9014-1(b), The above-captioned debtors (the “Debtors”), debtors-in-possession in the above-referenced chapter 11 cases hereby files this Witness and Exhibit List, and designates the following witnesses and exhibits for use in connection with the Hearing to Consider Second Day Motions (the “Hearing”) to be conducted on May 31, 2019 at 9:30 a.m. on the following Motions:

- Third Interim Hearing on *Debtors’ Emergency Motion for an Interim and Final Order (I) Authorizing the Use of Cash Collateral Pursuant to sections 105, 361,*

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.

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”);

- Hearing on *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]; and
- Hearing on *Order to Show Cause Regarding the Appointment of a Patient Care Ombudsman Pursuant to 11 U.S.C. § 333* (the “Show Cause Order”) [Docket No. 49].

WITNESSES

Debtors may call any one or more of the following witnesses at the Hearing:

<u>No.</u>	<u>Name</u>
1.	Karen Nicolaou, Debtor’s Chief Restructuring Officer
2.	All witnesses to be identified during ongoing discovery and not otherwise objected to by Debtors.
3.	All witnesses listed by any other party, whether or not called to testify, and not otherwise objected to by Debtors
4.	All witnesses needed to authenticate or identify exhibits
5.	Debtors reserve the right to amend and supplement this witness list.

EXHIBITS

Debtors may use one or more of the following exhibits at the Hearing:

<u>No.</u>	<u>Description</u>
1.	June Budgets
2.	Declaration of Karen Nicolaou In Support of First Day Motions, and exhibits thereto [Dkt. No. 13]
3.	Cash Management System Chart, Exhibit A to 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 [Dkt No. 9]
4.	Any exhibit listed by any other party
5.	Rebuttal exhibits
6.	Debtors reserve the right to amend and supplement this exhibit list

RESERVATION OF RIGHTS

The foregoing witness and exhibit list is being submitted based on information reasonably available to Debtors at this time and without waving any objection as to relevance, materiality, or admissibility of evidence in this litigation. Debtors reserve the right at any time to revise, correct, supplement or clarify this witness and exhibit list.

Dated: May 28, 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 28th 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