

EXHIBIT A
Proposed Order

**ORDER GRANTING DEBTORS' EMERGENCY MOTION FOR ENTRY OF AN ORDER
AUTHORIZING THE DEBTORS TO (I) MAINTAIN AND ADMINISTER THEIR RESIDENT REFUND
PROGRAM, AND (II) HONOR AND PAY OBLIGATIONS RELATED THERETO - Page 1**

**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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**ORDER GRANTING DEBTORS’ EMERGENCY MOTION FOR ENTRY OF AN
ORDER AUTHORIZING THE DEBTORS TO (I) MAINTAIN AND ADMINISTER
THEIR RESIDENT REFUND PROGRAM, AND (II) HONOR AND
PAY OBLIGATIONS RELATED THERETO**

ON THIS DATE this Court considered the Debtors’ *Emergency Motion for Entry of an Order Authorizing the Debtors to (I) Maintain and Administer their Resident Refund Program, and (II) Honor and Pay Obligations Related Thereto* (the “Motion”). Upon review of the

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 to hereto as **Schedule 1**. The Debtors’ mailing address is 545 E. John Carpenter Freeway, Suite 500, Irving, Texas 75062.

Motion and the Declaration of Karen Nicolaou (the “Nicolaou Declaration”) and upon consideration of the statements made in support of the Motion at a hearing held before the Court (the “Hearing”), the Court finds that it has jurisdiction over this matter pursuant to 28 U.S.C. § 1334; that the Motion is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); that the venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; that the Debtors provided adequate and appropriate notice of the Motion under the circumstances and that no other or further notice is required; that the legal and factual bases set forth in the Motion and at the Hearing established just cause for the relief granted in this Order; and any objections filed in response to the Motion have been withdrawn or overruled on the merits.²

Accordingly, **IT IS HEREBY ORDERED THAT:**

1. The Motion is **GRANTED** to the extent set forth herein.
2. The Debtors are authorized, but not directed, to continue to administer the Refund Program that was maintained by the Debtors before the commencement of these Chapter 11 Cases.
3. The Debtors are further authorized, but not directed, to honor and pay refund obligations that have either accrued under the Refund Program prepetition, or that may accrue post-petition under the Refund Program in the ordinary course of the Debtors’ business.
4. Nothing contained in this Order shall constitute, nor is it intended to constitute (a) an admission as to the validity of any claim against the Debtors; (b) a waiver of the Debtors’ rights to dispute any claim on any basis; or (c) an approval or assumption of any agreement, contract or lease, pursuant to section 365 of the Bankruptcy Code.

² All capitalized terms used but not otherwise defined in this Motion have the same meaning given to them in the Motion.

5. The Debtors are authorized to take all actions necessary to effectuate the relief granted pursuant to the Order.

6. Notice of the Motion provided by the Debtors is deemed to be good and sufficient notice of the Motion, and the requirements of the Local Rules are satisfied by the contents of the Motion.

7. Notwithstanding any Bankruptcy Rule to the contrary, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

8. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

END OF ORDER

PREPARED AND SUBMITTED BY:

CROWE & DUNLEVY, P.C.

By: /s/ Christina W. Stephenson

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PROPOSED ATTORNEYS 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