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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 file this Witness and Exhibit List, and designate the following witnesses and exhibits for use in connection with the hearing to be conducted on June 13, 2019 at 9:30 a.m. to consider the following Motions:

- *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*

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.

Assurance of Payment, and (III) Establishing Procedures for Resolving Requests by Utility Companies for Additional Adequate Assurance of Payment Date [Docket No.59] (the “Utility Motion”); and

- *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 [Docket No. 130] (the “Patient Refund Motion”).*

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

EXHIBITS

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

<u>No.</u>	<u>Description</u>
1.	Utility Companies List [Dkt No. 59]
2.	TXU additional adequate assurance request.
3.	Resident Agreement Form [Dkt No. 143]
4.	List of Resident Refund Obligations [Dkt No. 144]
5.	Declaration of Karen Nicolaou in Support of Patient Refund Motion [Dkt No. 130-2]
6.	Any exhibit listed by any other party
7.	Rebuttal exhibits
8.	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: June 12, 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, and/or electronic transmission via the Court's ECF noticing system on this 12th day of June, 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