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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.,<sup>1</sup>** § **Case No. 19-31484-sgj-11**  
§  
**Debtors.** § **(Jointly Administered)**

**DEBTORS’ WITNESS AND EXHIBIT LIST**

Pursuant to Local Rule 9014-1(c), 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 25, 2019 at 9:30 a.m. to consider the following Motions:

- Interim Hearing on *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)*

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<sup>1</sup> 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.

*Granting Adequate Protection to the Pre-Petition Secured Lenders* [Docket No. 8] (the “Cash Collateral Motion”);

- Final 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 to Use Existing Cash Management System, (II) Maintain Existing Bank Accounts, and (III) Waive Certain Deposit Guidelines* [Docket No. 9] (the “Cash Management Motion”);
- Final Hearing on *Debtor’s Emergency Motion for Authority to Enter into and Meet Obligations Under Insurance Premium Finance Agreements* [Docket No. 60] (the “Insurance Premium Motion”); and
- *Debtors’ Emergency Motion for an Order Authorizing the Debtors to Continue to Honor in the Ordinary Course of Business Certain Non-Insider Bonus Obligations* [Docket No.129] (the “Bonus Obligations Motion”).

**WITNESSES**

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

<b><u>No.</u></b>	<b><u>Name</u></b>
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
	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:

<b><u>No.</u></b>	<b><u>Description</u></b>
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 [Dkt No. 9]
4.	Bonus Obligations [Dkt No. 129-1]
5.	Titles of Key Employees [Dkt No. 129-2]
6.	Insurance Premium Agreement [To be provided]
7.	Any exhibit listed by any other party
8.	Rebuttal exhibits
	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 20, 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 20th day of June, 2019.

/s/ Christina W. Stephenson

Christina W. Stephenson

**Schedule 1**

**List of Debtors**

<b>#</b>	<b>Debtor Name</b>	<b>Case No.</b>	<b>EIN</b>
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