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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(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 July 18, 2019 at 9:30 a.m. to consider the following Motions:

- *Debtor’s Application for Entry of an Order Authorizing the Retention and Employment of Crowe & Dunlevy, P.C. as the Debtor’s Counsel Effective Nunc Pro Tunc to the Petition Date [Docket No. 114] (the “C&D Application”);*

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.

- *Debtors’ Application for Entry of an Order Authorizing the Debtors to Retain and Employ Donlin, Recano & Company, Inc. as Administrative Advisor Effective Nunc Pro Tunc to the Petition Date* [Docket No. 115] (the “DRC Application”); and
- *Application for Entry of an Order Authorizing the Employment and Retention of Haynes and Boone, LLP as Special Counsel for Debtor The LaSalle Group, Inc. Nunc Pro Tunc to May 19, 2019 Pursuant to 11 U.S.C. § 327(e)* [Docket No. 153] (the “Haynes and Boone Application”).

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
	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.	Declaration of Vickie Driver [Dkt. No. 114-2]
2.	Declaration of Karen Nicolaou In Support of the C&D Application [Dkt. No. 114-3]
3.	Donlin, Recano & Company Engagement Agreement [Dkt No. 115-1]
4.	Declaration of Matt Ferris [Dkt. No. 153]
5.	Any exhibit listed by any other party
6.	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: July 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, and/or electronic transmission via the Court's ECF noticing system on this 15th day of July, 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