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**COUNSEL FOR THE DEBTORS**

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

	§	
<b>In re:</b>	§	<b>Chapter 11</b>
	§	
<b>THE LASALLE GROUP, INC., et al.,<sup>1</sup></b>	§	<b>Case No. 19-31484-sgj-11</b>
	§	
<b>DEBTORS.</b>	§	<b>(Jointly Administered)</b>
	§	
	§	
	§	

**NOTICE OF POTENTIAL ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY  
CONTRACTS AND UNEXPIRED LEASES AND OBJECTION  
DEADLINE FOR CURE SCHEDULE**

PLEASE TAKE NOTICE that on July 26, 2019, The LaSalle Group, Inc., West Houston Memory Care, LLC, Pearland Memory Care, LLC, and Cinco Ranch Memory Care, LLC (collectively, the “Debtors”)<sup>2</sup> filed with the United States Bankruptcy Court for the Northern District of Texas (the “Bankruptcy Court”) a motion (the “Motion”)<sup>3</sup> seeking entry of an order

<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 1900 Enchanted Way, Suite 200, Grapevine, TX 76051.

<sup>2</sup> Riverstone Memory Care, LLC is not marketing or selling their facility or assets pursuant to this Motion, nor are any of their executory contracts or leases being assumed or assigned or rejected. Riverstone Memory Care, LLC as a Debtor is unaffected by this Order.

<sup>3</sup> Terms not otherwise defined herein shall have the same meaning as set forth in the Motion.

(the “Procedures Order”) (I)(A) approving the sale of all or part of the Debtors’ assets (“Purchased Assets”) free and clear of all liens, claims, encumbrances and other interests pursuant to Sections 105, 363(b), (f) and (m) of Title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the “Bankruptcy Code”), and (B) authorizing the assumption, assignment and sale of certain executory contracts and unexpired leases (the “Contracts and Leases”) pursuant to Bankruptcy Code sections 363 and 365, (II) approving bidding procedures in advance of sale and (III) granting related relief. On August 2, 2019, the Bankruptcy Court entered the Procedures Order.

PLEASE TAKE FURTHER NOTICE that the Debtors will conduct an Auction to determine the highest bid or bids for the Purchased Assets on August 27, 2019 at the law offices of Crowe & Dunlevy, P.C., 1919 McKinney Ave., Ste. 100, Dallas, TX 75201, beginning at 10:30 a.m. (prevailing Central Time).

PLEASE TAKE FURTHER NOTICE that in conjunction with the intended sale of the Assets, the Debtors may seek to assume and assign the executory contracts and unexpired leases set forth in the attached Schedule A of the Debtors’ Contracts and Leases (each defined in the Motion) to be assumed and assigned (the “Cure Schedule”) to the successful bidder or bidders at the Auction. The cure amounts for the Contracts and Leases to be assumed and assigned, within the meaning of 11 U.S.C. § 365, as proposed by the Purchaser, are in the attached Cure Schedule.

PLEASE TAKE FURTHER NOTICE that any objections to the stated cure amounts, to assumption and assignment of any of the Contracts or Leases, and/or to adequate assurance of future performance must be filed with the Bankruptcy Court, and served in such a manner that it is actually RECEIVED on or before **August 18, 2019, at 4:00 p.m. prevailing Central time**, by (i) the Debtors’ counsel, Crowe & Dunlevy, P.C., Attn: Vickie Driver, Crissie Stephenson, and Christopher Staine, 1919 McKinney Ave, Ste. 100, Dallas, TX 75201; (ii) counsel for the Secured Lenders: Streusand Landon, Ozburn Lemmon, LLP, Attn: Steve Lemmon and Rhonda Mates, 1801 S. MOPAC Expwy., Ste. 320, Austin, TX 78746, Forshey Prostok, LLP, Lynda Lankford and Bobby Forshey, 777 Main St., Ste. 1290, Fort Worth, TX, 76102; and (iii) counsel for the United States Trustee, Stephen McKitt, 1100 Commerce Street, Ste. 976, Dallas, TX 75242; (iv) counsel for the Official Unsecured Creditors Committee, Drinker Biddle, Attn: Vince Slusher, 1717 Main St., Ste. 5400, Dallas, TX 75201. Any such objection must set forth a specific default in any executory contract or unexpired lease and claim a specific monetary amount that differs from the amount, if any, specified in the Cure Schedule.

PLEASE TAKE FURTHER NOTICE that if no objection is received to the cure amount of any Contract or Lease, then the cure amount, if any, set forth in the Cure Schedule shall be binding upon the nondebtor party to each such Contract or Lease for all purposes in these cases and will constitute a final determination of the total cure amount, if any, required to be paid in connection with the assignment to, and assumption by, any purchaser. In addition, each nondebtor contracting party in connection with a Contract or Lease shall be forever barred from objecting to the cure amount set forth in the Cure Schedule, including, without limitation, the right to assert any addition cure or other amounts with respect to the Contract or Lease. Any party failing to object to the proposed sale transaction shall be deemed to consent to the

treatment of its Contract or Lease under Section 365 of the Bankruptcy Code and to consent to the assumption and assignment of its Contract or Lease notwithstanding any anti-alienation provision or other restriction on assignment.

PLEASE TAKE FURTHER NOTICE that if a timely objection is received, the hearing to consider objections to the proposed Cure Schedule will be held on **August 28, 2019, at 1:30 p.m.** (prevailing Central Time).

Dated August 7, 2019

By: /s/ Christina W. Stephenson

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**Schedule A**  
**Cure Amounts**