

Vincent P. Slusher
Drinker Biddle & Reath LLP
1717 Main St., Suite 5400
Dallas, Texas 75201-7367
Phone: (469) 357-2500
Fax: (469) 327-0860
vince.slusher@dbr.com
Texas Bar No. 00785480

*Proposed Attorneys for the Official
Committee of Unsecured Creditors of The
LaSalle Group, Inc., et al.*

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

)	
In re:)	Chapter 11
)	
THE LASALLE GROUP, INC., et al.,¹)	Bankr. Case No. 19-31484-sgj-11
)	
Debtors)	(Jointly Administered)
)	

**LIMITED OBJECTION OF THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS TO THE DEBTORS’ MOTION FOR ORDER
AUTHORIZING THE USE OF CASH COLLATERAL**

1. The Official Committee of Unsecured Creditors (the “Committee”) of The LaSalle Group, Inc. (“LaSalle”), by and through its proposed undersigned counsel, hereby files this limited objection (the “Limited Objection”) to the *Debtors’ Motion for Order Authorizing the Use of Cash Collateral*. In support of its Limited Objection, the Committee respectfully states as follows:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are as follows: The LaSalle Group, Inc. (0143); West Houston Memory Care, LLC (2760); Cinco Ranch Memory Care, LLC (2716); Pearland Memory Care, LLC (5311); and Riverstone Memory Care, LLC (5407). The Debtors’ mailing address is 545 E. John Carpenter Freeway, Suite 500, Irving, Texas 75062.

2. On May 2, 2019, the Debtors filed voluntary petitions for relief under chapter 11 of the Bankruptcy Code. The Debtors continue to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

3. The same day, the Debtors filed Debtors' Emergency Motion for an Interim and Final Order (I) Authorizing the Use of Cash Collateral Pursuant to Section 105, 361 and 363 of the Bankruptcy code and Federal Rule of Bankruptcy Procedure 4001(b); and (II) Granting Adequate Protection to the Pre-Petition Secured Lenders (the "Cash Collateral Motion") [ECF No. 8].

4. On July 3, 2019, the United States Trustee for Region 6 (the "UST") appointed the Committee in these cases pursuant to section 1102 of the Bankruptcy Code. Specifically, the Committee was appointed in the jointly administered case styled *In re The LaSalle Group, Inc., et al.*, No. 19-31484-sgj-11 [ECF No. 189].

5. On August 12, 2019, the United States Trustee for Region 6 (the "UST") filed an amended appointment that appointed the Committee in Case No. 19-31484-SFJ-11, *The LaSalle Group, Inc.*, pursuant to section 1102 of the Bankruptcy Code [ECF No. 297].

6. The relief sought in the Cash Collateral Motion has been granted on an interim basis, with a final hearing on the motion scheduled for August 28, 2019 at 1:30 p.m.

7. The Committee does not object to the entry of a final order on the Cash Collateral Motion, but files this Limited Objection to point out that in accordance with the Agreed Order on Origin Bank's Motion for Adequate Protection [ECF No. 314] entered on August 19, 2019, the Committee was granted a period of forty-five (45) days from the service of the Agreed order to investigate the validity, priority or perfection of Origin Bank's alleged security interest in the Equity Interests or Obligations, as defined in the agreed order, and if warranted, file an objection.

The Committee requests that any relief granted as to the Cash Collateral Motion should be subject to the Committee's investigatory rights as explained herein and as set forth in the Agreed Order on Origin Bank's Motion for Adequate Protection [ECF No. 314].

8. The Committee further notes that the relief proposed in Debtors' Motion for Order Authorizing the Use of Cash Collateral, fails to provide sufficient funds for the Committee's fees and expenses related to complying with its fiduciary obligations pursuant to section 1103 of the Bankruptcy Code.

9. The Committee reserves the right to revise, amend or supplement this Limited Objection at any time prior to the Final Hearing.

CONCLUSION

WHEREFORE, for the reasons stated, the Committee respectfully requests that to the extent Debtor's requested relief is granted in connection with Debtors' Motion for Order Authorizing the Use of Cash Collateral, that this Court require language reserving the Committee's investigatory rights as explained herein and as set forth in the Agreed Order on Origin Bank's Motion for Adequate Protection; and (ii) grant such other and further relief as the Court may deem just and proper.

Dated: August 27, 2019

DRINKER BIDDLE & REATH LLP

By: /s/ Vincent P. Slusher
Vincent P. Slusher
Kristen L. Perry
1717 Main St., Ste. 5400
Dallas, Texas 75201-7367
Phone: (469) 357-2500
Fax: (469) 327-0860
vince.slusher@dbr.com

-and-

James H. Millar
1177 Avenue of the Americas, 41st Floor
New York, New York 10036-2714
Phone: (212) 248-3140
Fax: (212) 248-3141
james.millar@dbr.com

-and-

Stacy A. Lutkus
321 Great Oaks Blvd.
Albany, New York 12203-5791
Phone: (518)452-8787
Fax: (518) 452-8767
stacy.lutkus@dbr.com

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing has been served via the Court's Electronic Filing System on all parties requesting notice in this proceeding on August 27, 2019.

/s/ Vincent P. Slusher
Vincent P. Slusher