

**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)
	§	

**PATIENT CARE OMBUDSMAN’S SECOND INTERIM REPORT
PEARLAND LOCATION**

Pursuant to 11 U.S.C. §333 of the Bankruptcy Code and the May 15, 2019 *Agreed Order Appointing a Patient Care Ombudsman Pursuant to 11 U.S.C. §333* [Docket No. 69], the United States Trustee provided *Notice of Appointment of Patient Care Ombudsman* (“**PCO**”) at Docket No. 86 on May 21, 2019. The PCO was directed to monitor the quality of care and represent resident interests at four locations: West Houston Memory Care, LLC (Case No. 19-31485) (“**West Houston**”); Cinco Ranch Memory Care, LLC (Case No. 19-31486) (“**Cinco Ranch**”); Pearland Memory Care, LLC (Case No. 19-31488) (“**Pearland**”); and, Riverstone Memory Care, LLC (Case No. 19-31493) (“**Riverstone**,” collectively “**Debtors**”).

Accordingly, PCO submitted *Patient Care Ombudsman’s First Interim Report Pearland Location* on July 5, 2019 at Docket No. 194. PCO comes now and submits this *Patient Care Ombudsman’s Second Interim Report, Pearland Location* (“**Pearland Second Report**”) detailing interim monitoring and second site visit observations and analysis of services provided at Pearland.

SITE VISIT SUMMARY

Pearland’s census on the date of PCO’s second site visit was thirty-four (34). At the time of PCO’s visit, the clinical team included a Director of Healthcare (“**DOH**”), a Resident Services

¹ In addition to the LaSalle Group, Inc. (last four EIN 0143), other Debtors include: West Houston Memory Care, LLC, Case No. 19-31485, last four EIN 2760; Cinco Ranch Memory Care, LLC, Case No. 19-31486, last four EIN 2716; Pearland Memory Care, LLC, Case No. 19-31488, last four EIN 5311; and, Riverstone Memory Care, LLC, Case No. 19-31493, last four EIN 5407.

Coordinator² (“**RSC**”), a medication technician, and three caregivers. Staffing appeared consistent with that observed during PCO’s first site visit. Clinical and Executive Leadership denied staffing challenges or departures associated with the bankruptcy.

The day before PCO’s site visit, landscaping services were provided. Staff described the grass as approximately 8 inches tall with extensive weeds at the time the service was provided. One prospective resident placement was reported as potentially lost due to the appearance of the landscaping. The replacement pest control vendor was reported as not yet in place with the site Maintenance Manager providing breakthrough treatment coverage awaiting new contract implementation. However, in the interim period the Life Safety visit did get accomplished and is up-to-date.

During the interim site visit period, the Executive Director (“**ED**”) reported having a washer and a dryer down for repairs. At the time of PCO’s visit, one dryer was broken, reported as “going down that day.” Further, the automatic laundry detergent dispensers in all four laundry rooms were not working. Staff was continuing to utilize the liquid soap concentrate although no measuring devices to assist them with dispensing a consistent amount from the 2.5-gallon container were noted. PCO checked the four laundry areas for soap, noting that two were out of soap and a third was close to being out. The Maintenance Manager had two additional 2.5-gallon containers available to place in the laundry areas.

At the time of PCO’s visit, one individual was working in the kitchen. Additional resident water was noted in the dry food stores. PCO reviewed kitchen log documentation. Consistent recording of food preparation temperatures was recommended. PH Testing logs were not immediately available for review. The sink issues reported in the First Report, that predated bankruptcy, remain. Additionally, one steam table well was noted to be down at the time of PCO’s visit. The kitchen team member denied resident impact from the needed repairs.

² The Resident Services Care Coordinator role is utilized at Cinco Ranch and Pearland locations.

As discussed in the other reports, Pearland experienced a period of difficult supply flow associated with the corporate office relocation transition. Donated supplies filled supply gaps during this period. While the issues associated with that move were believed to be improved, some supply order pacing was reported, whereby partial orders/shipments were made relative to what was requested. Resident impact was denied.

NEXT STEPS

Although PCO did not observe resident care decline as contemplated under 11 U.S.C. §333, the bankruptcy does appear to be having operational impact. Certainly, across the various locations, laundry equipment repair delays and changes in cleaning and detergent supply vendors appear to be financially related. Landscaping maintenance and pest vendor replacement delays are likely similarly related. Given these various dynamics, PCO would not be comfortable moving to remote-only monitoring and would need to plan on additional site visits in forty-five to sixty days.

DATED: September 5, 2019.

Respectfully submitted,

By: /s/Susan N. Goodman, AZ Bar #019483
Susan N. Goodman
Pivot Health Law, LLC
P.O. Box 69734
Oro Valley, AZ 85737
Phone: (520) 744-7061
Fax: (520) 575-4075
sgoodman@pivthealthaz.com
Patient Care Ombudsman

CERTIFICATE OF SERVICE

I, Susan N. Goodman, hereby certify that a copy of this document has been electronically filed with the Clerk of Court using the Court's electronic case filing system and a true and correct copy of this report has been sent to the following parties or counsel of record who have registered to receive electronic service.

DATED: September 5, 2019.

Respectfully submitted,

By: /s/Susan N. Goodman, AZ Bar #019483
 Pivot Health Law, LLC
 P.O. Box 69734
 Oro Valley, AZ 85737
 Phone: (520) 744-7061
sgoodman@pivothealthaz.com
Patient Care Ombudsman

<p>Crowe & Dunlevy Vickie L. Driver (DAL Office) Christopher Michael Staine (OKC Office) Christina Walton Stephenson (DAL Office) William H. Hoch III (OKC Office) 2525 McKinnon St., #425 Dallas, TX 75201 vickie.driver@crowedunlevy.com christopher.staine@crowedunlevy.com crissie.stephenson@crowedunlevy.com will.hoch@crowedunlevy.com <i>Attorneys for the Debtors</i></p>	<p>The United States Trustee’s Office Stephen McKitt Earle Cabell Federal Building 1100 Commerce Street, Room 976 Dallas, TX 75242 stephen.mckitt@usdoj.gov <i>Attorney for United States Trustee, Region 6</i></p>
<p>Streusand Landon Ozburn & Lemmon, LLP Stephen W. Lemmon Rhonda B. Mates 1801 S. MoPac Expressway, Suite 320 Austin, TX 78746 lemmon@slollp.com mates@slollp.com <i>Attorneys for Veritex Community Bank</i></p>	<p>Winstead PC Mike Massad Jason Enright 500 Winstead Building 2728 N. Harwood Street Dallas, TX 75201 mmassad@winstead.com jenright@winstead.com <i>Attorneys for Silverado Interests Holdings, LLC</i></p>
<p>MBL Law Cliff A. Wade Garrett L. Roberts 17330 Preston Road, Suite 160B Dallas, TX 75252 cliff.wade@mbl-law.com garrett.roberts@mbl-law.com <i>Attorneys for BOKF, N.A.</i></p>	<p>Linebarger Goggan Blair & Sampson, LLP Laurie A. Spindler 2777 N. Stemmons Freeway, Suite 1000 Dallas, TX 75207 dallas.bankruptcy@publicans.com <i>Attorneys for Irving ISD, Dallas County</i></p>
<p>McCreary, Veselka, Bragg & Allen P.C. Tara LeDay P.O. Box 1269 Round Rock, TX 78680 tleday@mvalaw.com <i>Attorneys for The County of Denton, Texas</i></p>	<p>Hedrick Kring, PLLC Katharine Battaia Clark 1700 Pacific Avenue, Suite 4650 Dallas, TX 75201 kclark@hedrickkring.com <i>Attorneys for TLG Family Management, LLC</i></p>

<p>Johnston Pratt PLLC Kenneth C. Johnston George H. Barber Sean M. Affleck 1717 Main Street, Suite 3000 Dallas, TX 75201 kjohnston@johnstonpratt.com gbarber@johnstonpratt.com saffleck@johnstonpratt.com Attorneys for First National Bank of Wichita Falls</p>	<p>Polsinelli PC Trey Monsour Savanna Barlow 2950 N. Harwood Street, Suite 2100 Dallas, TX 75201 tmonsour@polsinelli.com sbarlow@polsinelli.com Attorneys for NHI-REIT of TX-IL, LLC</p>
<p>Linebarger Goggan Blair & Sampson, LLP John P. Dillman P.O. Box 3064 Houston, TX 77253 houston_bankruptcy@publicans.com Attorneys for Cypress-Fairbanks ISD; Montgomery County; Fort Bend County; and, Harris County</p>	<p>Forshey & Prostok, LLP Jeff P. Prostok Lydia L. Lankford 777 Main Street, Suite 1290 Fort Worth, TX 76102 jprostok@forsheyprostok.com llankford@forsheyprostok.com Attorneys for Origin Bank</p>
<p>Bryan Cave Leighton Paisner, LLP Trinitee G. Green 161 N. Clark Street, Suite 4300 Chicago, IL 60601 trinitee.green@bclplaw.com Attorneys for U.S. Foods</p>	<p>Chapman and Cutler LLP Mia D. D'Andrea 111 W. Monroe Street Chicago, IL 60603 dandrea@chapman.com Attorneys for BMO Harris Bank N.A.</p>
<p>Carver, Darden, Koretzky, Tessier, Finn ,Blossman & Areaux, L.L.C. Leann Opotowsky Moses 1100 Poydras Street, Suite 3100 New Orleans, LA 70163 moses@carverdarden.com Attorneys for Hancock Whitney Bank</p>	<p>McGuire, Craddock & Strother, P.C. J. Mark Chevallier 2501 N. Harwood, Suite 1800 Dallas, TX 75201 mchevallier@mcsllaw.com Attorneys for TCF National Bank, N.A.</p>
<p>Howard & Howard Gustaf R. Andreasen 450 W. 4th Street Royal Oak, MI 48067 gandreasen@howardandhoward.com Attorneys for TCF National Bank, N.A.</p>	<p>Texas Attorney General's Office Bankruptcy & Collections Division J. Casey Roy P.O. Box 12548-MC 008 Austin, TX 78711-2548 casey.roy@oag.texas.gov Attorneys for Texas Health & Human Services Commission</p>
<p>Reed Smith LLP Michael P. Cooley Keith M. Aurzada Lindsey L. Robin 2501 N. Harwood, Suite 1700 Dallas, TX 75201 mpcooley@reedsmith.com kaurzada@reedsmith.com lrobin@reedsmith.com Attorneys for Fannie Mae</p>	<p>Perdue, Brandon, Fielder, Collins & Mott, L.L.P. Ebony Cobb 500 E. Border Street, Suite 640 Arlington, TX 76010 ecobb@pbfc.com Attorneys for Richardson ISD; DCURD; Crowley ISD; Arlington ISD; City of Haltom City</p>

<p>Bell Nunnally & Martin LLP Russell W. Mills 2323 Ross Ave., Suite 1900 Dallas, TX 75201 rmills@bellnunnally.com Attorneys for Bell Nunnally & Martin LLP</p>	<p>Drinker Biddle & Reath LLP Vincent P. Slusher (DAL Office) James H. Millar (NYC Office) Steven K. Kortanek (DEL Office) 1717 Main Street, Suite 5400 Dallas, TX 75201-7367 vince.slusher@dbr.com james.millar@dbr.com steven.kortanek@dbr.com Attorneys for Ad Hoc Group of Creditors; Unsecured Creditors Committee</p>
<p>John P. Lewis 1412 Main Street, Suite 210 Dallas, TX 75202 jplewisjr@mindspring.com Attorney for Melvin W. Warren, Jr.</p>	<p>Griffith Jay & Michel, LLP Mark J. Petrocchi 2200 Forest Park Blvd. Fort Worth, TX 76110 mpetrocchi@lawgjm.com Attorneys for Mitchell Warren, Party in Interest</p>
<p>Morris, Manning & Martin, LLP Bonnie Y. Hochman Rothell Jessica A. Rodriguez 1401 Eye Street NW, Suite 600 Washington D.C. 20005 bhrothell@mmmlaw.com jrodriguez@mmmlaw.com Attorneys for KeyBank National Assoc.</p>	<p>Williams, Morris & Waymire Jason Waymire 4330 S. Lee Street, Bldg. 400, Ste. A Buford, GA 30518 jason@wmwlaw.com Attorneys for Christine Mennella; Estate of J. Mennella and Diane Hood</p>
<p>Underwood Perkins, P.C. David L. Campbell Kimberly D. Annelo Eli D. Pierce 5420 LBJ Freeway, Suite 1900 Dallas, TX 75240 dcampbell@uplawtx.com kannello@uplawtx.com epierce@uplawtx.com Attorneys for First Secure Community Bank</p>	<p>Munsch Hardt Kopf & Harr, P.C. Deborah M. Perry 500 N. Akard Street, Suite 3800 Dallas, TX 75201-6659 dperry@munsch.com Attorneys for United Community Bank</p>
<p>Horwood Marcus & Berk Chartered Eric S. Rein John Guzzardo 500 W. Madison Street, Suite 3700 Chicago, IL 60661 rrein@hmblaw.com jguzzardo@hmblaw.com Attorneys for First Secure Community Bank</p>	<p>Higier Allen & Lautin, P.C. Jason T. Rodriguez, Esq. The Tower at Cityplace 2711 N. Haskell Ave., Suite 2400 Dallas, TX 75204 jrodriguez@higierallen.com Attorneys for Branch Banking & Trust Co.</p>
<p>Missouri Department of Revenue General Counsel's Office John Whiteman, Special Assistant Attorney General 301 W. High Street, Room 670 P.O. Box 475 Jefferson City, MO 65105-0475 ndtx@dor.mo.gov Attorneys for Missouri Department of Revenue</p>	<p>Hoover Slovacek LLP Curtis W. McCreight Galleria Tower II 5051 Westheimer, Suite 1200 Houston, TX 77056 mccreight@hooverslovacek.com Attorneys for Cinco Commercial Property Assoc., Inc.; Shadow Creek Ranch Commercial Owners Association, Inc.; Cinco Landscape Maintenance Assoc., Inc.</p>

<p>HEDRICK KRING, PLLC Katharine B. Clark Laura Fontaine Megan Servage 1700 Pacific Avenue, Suite 4650 Dallas, Texas 75201 214-880-9600 (Telephone) 214-481-1844 (Facsimile) kclark@hedrickkring.com laura@hedrickkring.com megan@hedrickkring.com Attorneys for The LaSalle Group Family Management LLC</p>	<p>ShaQaz Wilder 200 E. 5th Avenue, Suite 123 Naperville, Illinois 60563 shaqazw@gmail.com (emails returned undeliverable) Creditor Appointed to Unsecured Creditors' Committee</p>
<p>Aracelis Ruffolo 38W401 Sidney Court St. Charles, Illinois 60175 alice@ruffolo.com Creditor Appointed to Unsecured Creditors' Committee</p>	<p>Vilora L. Williams 2636 Glenmore Dr. Mesquite, TX 75150 vlwilliams10@yahoo.com Creditor Appointed to Unsecured Creditors' Committee</p>
<p>Holland and Knight Robert W. Jones Brian J. Smith 200 Crescent Court, Suite 1600 Dallas, TX 75201 robert.jones@hklaw.com brian.smith@hklaw.com Attorneys for First American Payment Systems, L.P.</p>	<p>Morris, Manning & Martin LLP Bonnie Y. Hochman Rothell Jessica A. Rodriguez 1401 Eye Street NW, Suite 600 Washington DC 20005 bhrothell@mmmlaw.com jrodriguez@mmmlaw.com Attorneys for Key Bank Nat'l Assoc.</p>
<p>Perdue, Brandon, Fielder, Collins & Mott, LLP Owen M. Sonik 1235 N. Loop West, Suite 600 Houston, TX 77008 osonik@pbfc.com Attorneys for Brazoria County, et al.</p>	<p>Texas Comptroller of Public Accounts John Mark Stern Sherri K. Simpson, Paralegal Atty Gen. Office, Bankruptcy & Collections Division P.O. Box 12548 Austin, TX 78711-2548 bk-jstern@oag.texas.gov sherri.simpson@oag.texas.gov Attorneys for Texas Comptroller of Public Accts.</p>