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**COUNSEL FOR KEYBANK NATIONAL
ASSOCIATION**

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

IN RE:	§	Chapter 11
	§	
THE LASALLE GROUP, INC., et al.,	§	CASE NO. 19-31484
	§	
Debtors.	§	(Jointly Administered)

**LIMITED OBJECTION TO DEBTOR’S MOTION TO APPROVE
PROCEDURES FOR DE MINIMIS ASSET TRANSACTIONS**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, KeyBank National Association (“KeyBank”), an interested party in the above-referenced case, by and through their undersigned counsel, and hereby asserts its limited objection with respect to Debtor’s Motion to Approve Procedures for De Minimis Asset Transactions (the “Motion”) [Dkt. No. 285] and states as follows:

1. The LaSalle Group, Inc. (“LaSalle”) owns an equity interest in a healthcare facility located in Denton County, Texas known as Carrollton Autumn Leaves, L.P. (“Carrollton Autumn Leaves”).
2. KeyBank is the lender for that certain loan made to Carrollton Autumn Leaves in the original principal amount of \$4,490,600.00 as evidenced by the Healthcare Facility Note, dated

December 1, 2013 (the “Mortgage Note”), which Mortgage Note was insured by the United States Department of Housing and Urban Development (“HUD”).

3. Carrollton Autumn Leaves’ obligations under the Mortgage Note are secured by the Healthcare Deed of Trust, Assignment of Leases, Rents and Revenue and Security Agreement, dated December 1, 2013 (the “Deed of Trust”).

4. The loan is governed by HUD statutes, regulations and guidelines as well as the Mortgage Note, Deed of Trust, and other loan documents executed in connection with the above-described mortgage loan.

5. Carrollton Autumn Leaves is in default under the Mortgage Note and other loan documents.

6. KeyBank recently learned that the Motion may encompass and, thus, seek to establish procedures relating to the future sale or transfer of LaSalle’s equity interests in Carrollton Autumn Leaves.

7. While KeyBank is generally supportive of a sale or transfer of LaSalle’s equity interests in Carrollton Autumn Leaves, pursuant to applicable HUD rules and regulations as well as the governing loan documents, any such transaction would require prior review and approval by KeyBank, as lender, and HUD.

CONCLUSION

WHEREFORE, KeyBank respectfully requests that the Court approve the Motion only if the proposed order is revised to reflect that no sale of LaSalle’s equity interests in Carrollton Autumn Leaves can be effectuated without prior review and approval by KeyBank and HUD, based on the objections of KeyBank as set forth herein, and grant such other and further relief as this Court deems appropriate.

Dated: October 8, 2019

Respectfully submitted,

By: /s/ Bonnie Y. Hochman Rothell

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CERTIFICATE OF SERVICE

This is to certify that on October 8, 2019, a true and correct copy of the above and foregoing *Limited Objection to Debtor's Motion to Approve Procedures for De Minimis Asset Transactions* was filed with the court via CM/ECF and served on all parties requesting electronic notification.

/s/ Bonnie Y. Hochman Rothell
Bonnie Y. Hochman Rothell