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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 October 10, 2019 at 2:30 p.m. to consider the following Motions:

- *Debtor’s Motion to Approve Procedures for De Minimis Asset Transactions*
[Docket No. 285] (the “De Minimis Asset Transactions Motion”);
- *Application for Entry of an Order Authorizing the Retention and Employment of Weaver and Tidwell, L.L.P. as Employee Benefit Plan Auditor for Debtor the LaSalle*

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 I. The Debtors’ mailing address is 1900 Enchanted Way, Ste. 200, Grapevine, TX 76051.

Group, Inc., Effective Nunc Pro Tunc to September 5, 2019 [Docket No. 377] (the “Weaver and Tidwell Employment Application”);

- *Motion to Establish Escrow Procedures for Sales Proceeds Due to Insiders* [Docket No. 391] (the “Escrow Procedures Motion”); and
- *Application for Entry of an Order Authorizing the Retention and Employment of CliftonLarsonAllen, LLP, as Tax Consultant for Debtor The LaSalle Group, Inc. Effective Nunc Pro Tunc to August 15, 2019* [Docket No. 394] (the “CliftonLarsonAllen Employment 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.	[Proposed] Order Authorizing and Approving Procedures for De Minimis Asset Transactions
2.	[Proposed] Order Approving the Employment and Retention of Weaver and Tidwell, L.L.P., as Employee Benefit Plan Auditor
3.	Weaver and Tidwell Engagement Agreement

4.	Declaration of Aracely Rios, Partner in the Assurance Services Division of Weaver and Tidwell
5.	[Proposed] Order Approving the Employment and Retention of CliftonLarsonAllen, LLP, as Tax Consultant
6.	CliftonLarsonAllen Engagement Agreement
7.	Declaration of Richard T. Baumeister, Jr, Managing Principal of CliftonLarsonAllen
	Any exhibit listed by any other party
	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, October 9, 2019

CROWE & DUNLEVY, P.C.

By: /s/ Christina W. Stephenson

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COUNSEL FOR THE DEBTORS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing pleading was served upon all parties receiving notice via the Court's ECF noticing system on this 9th day of October, 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