

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

IN RE: )  
 ) Chapter 11  
TEHUM CARE SERVICES, INC.,<sup>1</sup> )  
 ) Case No. 23-90086 (CML)  
DEBTOR )

**CAPITOL EYE CARE, INC.; CMMP SURGICAL CENTER, L.L.C.; JEFFERSON CITY ORAL AND MAXILLOFACIAL SURGERY, L.L.C.; AND MID-MISSOURI ANESTHESIA CONSULTANTS, P.C.’S OBJECTION TO JOINT EMERGENCY MOTION FOR ENTRY OF AN ORDER (I) CONDITIONALLY APPROVING THE ADEQUACY OF THE DISCLOSURE STATEMENT, (II) APPROVING THE SOLICITATION AND NOTICE PROCEDURES WITH RESPECT TO CONFIRMATION OF THE JOINT CHAPTER 11 PLAN, (III) APPROVING THE FORMS OF BALLOTS AND NOTICES IN CONNECTION THEREWITH, (IV) SCHEDULING CERTAIN DATES WITH RESPECT THERETO, AND (V) GRANTING RELATED RELIEF**

Capitol Eye Care, Inc.; Jefferson City Oral and Maxillofacial Surgery, L.L.C., CMMP Surgical Center, L.L.C., and Mid-Missouri Anesthesia Consultants<sup>2</sup> join in the Objection filed by the U.S. Trustee (ECF No. 1022), as well as the Objection filed by William Kelly, Derico Thompson, and Kohchise Jackson (ECF No. 1027).

For the reasons discussed in those Objections (ECF Nos. 1022, 1027), the Court should deny approval of the Debtor and the Official Committee of Unsecured Creditors’ Joint Emergency Motion (ECF No. 986) and enter its Order granting such other and further relief as it deems proper.

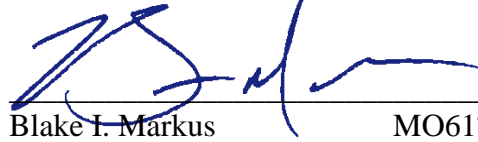
<sup>1</sup> The last four digits of the Debtor’s federal tax identification number is 8853. The Debtor’s service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.

<sup>2</sup> There is also a claim filed on behalf of the Putative Class in U.S. District Court, Western District of Missouri, Case No. 2:22-cv-04191-MDH. (Claim 146-1). To the extent the Putative Class’s claim is recognized here, the Putative Class also joins in this objection.



Respectfully submitted,

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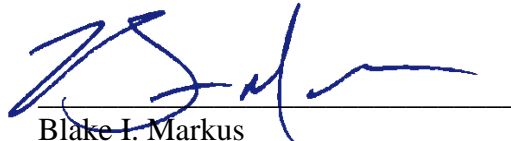
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*Attorneys for Capitol Eye Care, Inc.; CMMP Surgical Center, L.L.C.; Jefferson City Oral And Maxillofacial Surgery, L.L.C.; Mid-Missouri Anesthesia Consultants, P.C.; and the Putative Class in U.S. District Court, Western District of Missouri, Case No. 2:22-cv-04191-MDH*

**CERTIFICATE OF SERVICE**

I certify that on October 16, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system.



Blake I. Markus