

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS

In Re:	:	Chapter 11
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	:	
TEHUM CARE SERVICES, INC., et al.,	:	Case No.: 23-90086-CML
	:	
Debtor,	:	
	:	
	:	
	:	
	:	

ORDER

AND NOW, this _____ day of _____, 2024, upon consideration of Creditor, The Estate of Robert Johnson, Jr., Response in Opposition to Debtor’s Objection to Creditor’s First Amended Motion from Relief from Stay is **GRANTED**.

It is hereby **ORDERED** and **DECRED** that the stay is lifted to allow Creditor, The Estate of Robert Johnson, Jr. is allowed to proceed with their litigation: The Estate of Robert Johnson, Jr. v Hahnemann University, et al. Court of Common Pleas, Philadelphia County, No.: 190301405 against Debtor, Tehum Care Services, Inc., d/b/a Corizon Health, Inc. through trial and any settlement and/or verdict ordered against Debtor shall be limited against Debtor only as to the proceeds of the insurance policy applicable to the debtor, Tehum Care Services, Inc., d/b/a Corizon Health.

BY THE COURT

J.



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FOR THE SOUTHERN DISTRICT OF TEXAS

In Re: : **Chapter 11**
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TEHUM CARE SERVICES, INC., et al., : **Case No.: 23-90086-CML**
:
: **Debtor,** : **RESPONSE IN OPPOSITION TO**
: **DEBTOR'S OBJECTION TO**
: **CREDITOR'S FIRST AMENDED**
: **MOTION FROM RELIEF FROM STAY**
:
:

AND NOW COMES CREDITOR, THE ESTATE OF ROBERT JOHNSON, Jr., by and through their counsel, van der Veen, Hartshorn, Levin & Lindheim, to Respond to the Objections of Debtor Tehum Care Services, Inc., to the request that this Honorable Court grant a waiver to Creditor against Debtor Tehum Care Services, Inc., d/b/a Corizon Health, Inc. ("Debtor").

Whereas Motion for Relief from Stay from Bankruptcy was filed, Debtor responds in large part opposing the relief on the basis that debtor has no assets to satisfy any claims asserted.

To the extent the motion for relief does not make itself clear, movant The Estate of Robert Johnson, Jr. seeks relief from the bankruptcy against debtor ONLY for the purposes of continuing the litigation filed in the matter of The Estate of Robert Johnson, Jr. v Hahnemann University, et al. Court of Common Pleas, Philadelphia County, No.: 190301405 AND to the extent that any recovery may be obtained against debtor by way of settlement or verdict, movant seeks relief ONLY against debtor to the extent of any available insurance that would have been enforced in effect at the time that the claim to which debtor was a named insured, insured and/or insured through the Commonwealth of Pennsylvania.

WHEREFORE, Creditor prays that this Honorable Cort grant the within Motion and enter the Proposed Order permitting the stay afforded by 11 U.S.C. Section 362 to be lifted so as to permit to proceed with the case, The Estate of Robert Johnson, Jr. v Hahnemann University, et al. Court of Common Pleas, Philadelphia County, No.: 190301405 through trial and judgment in an amount not in excess of insurance coverage, in addition to awarding such other and further relief as this Honorable Court deems appropriate and just under the circumstances.

VAN DER VEEN, HARTSHORN, LEVIN & LINDHEIM

BY: _____


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Date: 5-29-24

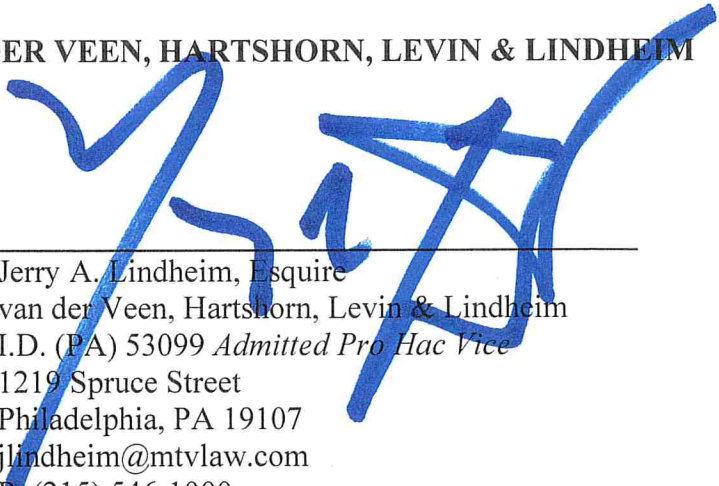
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FOR THE SOUTHERN DISTRICT OF TEXAS

In Re: : Chapter 11
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TEHUM CARE SERVICES, INC., et al., : Case No.: 23-90086-CML
: :
Debtor, : :
: CERTIFICATE OF SERVICE
: :
: :
: :

I, Jerry A. Lindheim, do hereby certify that service of a true and correct copy of the Response in Opposition to Debtor's Objection to Creditor's First Amended Motion from Relief from Stay has been served on all parties and counsel of record on today's date via the Court's electronic filing system.

VAN DER VEEN, HARTSHORN, LEVIN & LINDHEIM

BY: _____



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