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

In re:	)	Chapter 11
TEHUM CARE SERVICES, INC.,	)	Case No. 23-90086 (CML)
Debtor. <sup>1</sup>	)	
	)	

## CERTIFICATE OF NO OBJECTION TO THE APPLICATION FOR ORDER AUTHORIZING THE RETENTION OF MOLOLAMKEN LLP AS SPECIAL APPELLATE COUNSEL FOR THE OFFICIAL TORT CLAIMANTS' COMMITTEE NUNC PRO TUNC TO APRIL 15, 2024

Pursuant to the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas*, the undersigned representative of the Official Tort Claimants' Committee (the "TCC") of the above-captioned debtor and debtor in possession certifies as follows:

- 1. On May 14, 2024, the Official Tort Claimants' Committee ("TCC") filed its Application for Order Authorizing the Employment and Retention of MoloLamken LLP as Special Appellate Counsel for the Official Tort Claimants' Committee *Nunc Pro Tunc* to April 15, 2024, and the supporting declaration of Jeffrey A. Lamken, Esq. [Dkt. No. 1560, the "Application"].
- 2. On May 14, 2024, the TCC also filed the proposed Order Authorizing the Employment and Retention of MoloLamken LLP as Special Appellate Counsel for the TCC of Tort Claimants *Nunc Pro Tunc* to April 15, 2024 (the "Order") [Dkt. No. 1560].
- 3. The Application and proposed Order were electronically filed with Court using the CM/ECF system, which served notification to all parties of interest authorized to receive electronic notice in this case [See Dkt. No. 1560].

<sup>&</sup>lt;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.



- 4. The deadline for parties to file responses to the Application was June 4, 2024, which was extended by agreement to June 30, 2024, but no longer (the "Objection Deadline"). No responses to the Application were filed on the docket on or before the Objection Deadline. Additionally, neither the TCC nor below-signed counsel received any informal responses to the Application providing a basis as to why the Application should not be granted.
- 5. Accordingly, the TCC requests that the Court enter the Order attached hereto at the earliest convenience for the Court.

Dated this 2<sup>nd</sup> day of July, 2024.

/s/ Michael W. Zimmerman

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## **CERTIFICATE OF SERVICE**

I, Michael W. Zimmerman, hereby certify that on July 2, 2024, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas to all parties authorized to receive electronic notice in this case.

/s/ Michael W. Zimmerman
Michael W. Zimmerman