

**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, )

**AMENDED MOTION BY CREDITOR KRISTINE WILLIAMS  
FOR LEAVE TO FILE UNTIMELY PROOF OF CLAIM**

Creditor, Kristine Williams (“hereinafter Creditor”), by her undersigned attorneys, hereby moves this Court to grant leave for Creditor to file an untimely proof of claim in the bankruptcy proceeding filed by debtor Tehum Care Services, Inc. (“Debtor”). Creditor was not provided with any notice of the bankruptcy filing. The claims bar date was August 14, 2023, but Creditor has not received notices from Debtor’s bankruptcy proceeding including notice of the deadline to file a proof of claim. Creditor is not listed as a creditor in Debtor’s schedules of assets and liabilities nor is Creditor listed on Debtor’s mailing matrix for purposes of notification.

Pursuant to Federal Rule of Bankruptcy procedure 3002(c)(6) and Local Rule 3003-1(c)(4), this Court may extend the time in which a creditor may file a claim by not more than sixty days from the date of the order granting the motion if the court determines either (1) notice of commencement of the bankruptcy case was insufficient under the circumstances to give creditor a reasonable time to file a proof of claim because the debtor failed to timely list the creditor’s name and address as required by Rule 1007(a); or (2) notice was insufficient under the circumstances to give creditor a reasonable time to file a proof of claim.

In April 2024, Creditor joined parties to her pending claim for wrongful death (*Kristine Williams v. Missouri Department of Corrections*, et al., Case No.: 1:24-cv-00054-ACL) alleged to have provided healthcare to Creditor’s son (“Decedent”) while Creditor’s Decedent was



incarcerated at the SouthEast Correctional Center in Charleston, Missouri. Following joinder of those parties to her claim for wrongful death, Creditor discovered these parties may have been Corizon employees, discovered this bankruptcy proceeding, and discovered that the deadline for filing proofs of claim had passed without her receiving notice. Creditor's claims arise out of the death of her son and Creditor promptly sought admission to this Court *pro hac vice* to proceed with this Motion. Accordingly, Creditor requests leave to file the proof of claim attached hereto as Exhibit A (the "Proof of Claim.")

WHEREFORE, Creditor respectfully requests that this Court enter an Order granting Creditor an extension of time to file Proof of Claim on or before sixty days from the date of entry of the Order.

HALL ANSLEY,  
A Professional Corporation

By: /s/ Adam P. Pihana  
ADAM P. PIHANA  
Missouri Bar Number 59540  
TIMOTHY A. RICKER  
Missouri Bar Number 62050

3275 East Ridgeview  
Springfield, MO 65804  
Telephone: 417/890-8700  
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Email: [tricker@hallansley.com](mailto:tricker@hallansley.com)

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

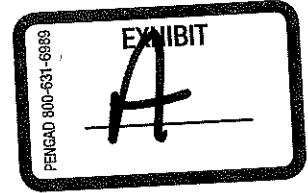
The undersigned certifies that on the 6<sup>th</sup> day of August, 2024, the foregoing instrument was electronically filed with the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

HALL ANSLEY,  
A Professional Corporation

By: /s/ Adam P. Pihana  
ADAM P. PIHANA  
Missouri Bar Number 59540

Fill in this information to identify the case:

Debtor 1 Corizon, LLC  
 Debtor 2 \_\_\_\_\_  
 (Spouse, if filing)  
 United States Bankruptcy Court for the: Southern District of Texas  
 Case number 23-90086



**Official Form 410**  
**Proof of Claim**

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

**Part 1: Identify the Claim**

1. Who is the current creditor? Kristine Williams on behalf of Austen May, deceased  
 Name of the current creditor (the person or entity to be paid for this claim)  
 Other names the creditor used with the debtor \_\_\_\_\_

2. Has this claim been acquired from someone else?  
 No  
 Yes. From whom? \_\_\_\_\_

3. Where should notices and payments to the creditor be sent?  Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	<b>Where should notices to the creditor be sent?</b>	<b>Where should payments to the creditor be sent? (if different)</b>
	<u>Hall Ansley, P.C. / Adam P. Pihana</u> Name <u>3275 E. Ridgeview</u> Number Street <u>Springfield MO 65804</u> City State ZIP Code Contact phone <u>417-890-8700</u> Contact email <u>apihana@hallansley.com</u>	<u>Hall Ansley, P.C. / Adam P. Pihana</u> Name <u>3275 E. Ridgeview</u> Number Street <u>Springfield MO 65804</u> City State ZIP Code Contact phone <u>417-890-8700</u> Contact email <u>apihana@hallansley.com</u>

Uniform claim identifier for electronic payments in chapter 13 (if you use one):  
 \_\_\_\_\_

4. Does this claim amend one already filed?  
 No  
 Yes. Claim number on court claims registry (if known) \_\_\_\_\_ Filed on \_\_\_\_\_  
 MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?  
 No  
 Yes. Who made the earlier filing? \_\_\_\_\_

**Part 2: Give Information About the Claim as of the Date the Case Was Filed**

6. Do you have any number you use to identify the debtor?  No  
 Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: \_\_\_\_\_

7. How much is the claim? \$ 10,000,000.00 Does this amount include interest or other charges?  
 No  
 Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.  
 Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).  
 Limit disclosing information that is entitled to privacy, such as health care information.  
Wrongful death

9. Is all or part of the claim secured?  No  
 Yes. The claim is secured by a lien on property.  
**Nature of property:**  
 Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.  
 Motor vehicle  
 Other. Describe: \_\_\_\_\_  
**Basis for perfection:** \_\_\_\_\_  
 Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)  
**Value of property:** \$ \_\_\_\_\_  
**Amount of the claim that is secured:** \$ \_\_\_\_\_  
**Amount of the claim that is unsecured:** \$ \_\_\_\_\_ (The sum of the secured and unsecured amounts should match the amount in line 7.)  
**Amount necessary to cure any default as of the date of the petition:** \$ \_\_\_\_\_  
**Annual Interest Rate** (when case was filed) \_\_\_\_\_ %  
 Fixed  
 Variable

10. Is this claim based on a lease?  No  
 Yes. Amount necessary to cure any default as of the date of the petition. \$ \_\_\_\_\_

11. Is this claim subject to a right of setoff?  No  
 Yes. Identify the property: \_\_\_\_\_

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?  No

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

Yes. Check one:

<input type="checkbox"/> Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).	Amount entitled to priority \$ _____
<input type="checkbox"/> Up to \$3,350* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).	\$ _____
<input type="checkbox"/> Wages, salaries, or commissions (up to \$15,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).	\$ _____
<input type="checkbox"/> Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).	\$ _____
<input type="checkbox"/> Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).	\$ _____
<input type="checkbox"/> Other. Specify subsection of 11 U.S.C. § 507(a)(____) that applies.	\$ _____

\* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

**Part 3: Sign Below**

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

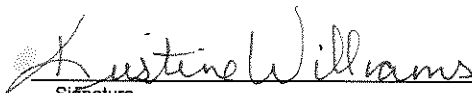
- I am the creditor.
- I am the creditor's attorney or authorized agent.
- I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.
- I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 06/10/2024  
MM / DD / YYYY

  
Signature

Print the name of the person who is completing and signing this claim:

Name Kristine Williams  
First name Middle name Last name

Title \_\_\_\_\_

Company May be contacted through attorney Hall Ansley PC Adam P. Pihana  
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address 3275 E. Ridgeview  
Number Street

Springfield MO 65804  
City State ZIP Code

Contact phone 417-890-8700 Email apihana@hallansley.com