

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

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

**THIRTEENTH MONTHLY FEE STATEMENT OF STINSON LLP FOR SERVICES
RENDERED AND REIMBURSEMENT OF EXPENSES INCURRED
FROM JUNE 1, 2024 THROUGH JUNE 30, 2024**

This notice implements the *Amended Order Establishing Procedures of Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 1646]. Each party receiving the notice of the monthly fee statement will have until 4:00 p.m. (prevailing Central Time) 14 days after service of the monthly fee statement to object to the requested fees and expenses. Upon the expiration of such 14-day period, the Debtor is authorized and directed to pay the Professional an amount equal to 80 percent of the fees and 100 percent of the expenses requested in the applicable monthly fee statement that are not subject to an objection.

Pursuant to the *Amended Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professionals* [Docket No. 1646] entered by the Court on August 5, 2024 (the "Interim Compensation Order"), Stinson, LLP ("Stinson"), as counsel for the Official Committee of Unsecured Creditors of Tehum Care Services, Inc. (the "UCC"), submits this thirteenth monthly fee statement ("Fee Statement") for services rendered and expenses incurred in this Chapter 11 case for the period of June 1, 2024 through June 30, 2024 (the "Statement Period").

On March 2, 2023, the United States Trustee for the Southern District of Texas appointed the Committee pursuant to section 1102 of the Bankruptcy Code [Docket No. 77, as amended by

¹ 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.



Docket No. 145]. On May 2, 2023, the Court entered an order approving Stinson's retention as counsel for the Committee [Docket No. 495], effective as of March 9, 2023.

Stinson seeks payment of interim compensation in the total amount of **\$49,972.85** which is calculated as follows: \$49,764.00 in fees (80% of \$62,205.00) and \$208.85 in expenses (100% of expenses). Pursuant to the Interim Compensation Order, any party objecting to the payment of interim compensation and reimbursement of expenses as requested shall, by 4:00 p.m. (prevailing Central Time) 14 days after service of the Fee Statement, serve a written objection setting forth the precise nature of the objection and the amount at issue upon the Committee and each of the following Application Recipients as defined in the Interim Compensation Order:

- The Debtors: Tehum Care Services, Inc., Attn: Russell Perry (russell.perry@ankura.com);
- Counsel to the Debtor: Gray Reed (tehumbk@grayreed.com), Attn: Jason S. Brookner; Aaron M. Kaufman; Lydia R. Webb; and Amber M. Carson;
- The Office of the United States Trustee for the Southern District of Texas, Attn: Ha Nguyen (Ha.Nguyen@usdoj.gov) and Andrew Jimenez (Andrew.Jimenez@usdoj.gov);
- Counsel to M2 LoanCo, LLC, Norton Rose Fulbright, Attn: Kristian W. Gluck (Kristian.gluck@nortonrosefulbright.com);
- Counsel to the UCC: Stinson LLP, Attn: Nicholas Zluticky (nicholas.zluticky@stinson.com), and Zachary Hemenway (zachary.hemenway@stinson.com); and
- Counsel to the TCC, Brown Rudnick LLP (BRTEhumTeam@brownrudnick.com), Attn: Eric R. Goodman, D. Cameron Moxley, Gerard T. Cicero; and Berry Riddell, LLC, Attn: Michael W. Zimmerman (mz@berryriddell.com).

If no objection is timely served pursuant to the Interim Compensation Order, the Debtor shall be authorized to pay Stinson an amount equal to 80% of the fees and 100% of the expenses listed herein, or if an objection is timely served, such percentage fees and expenses that are not subject to an objection. Pursuant to the Interim Compensation Order, any objection must set forth the precise nature of the objection and the amount at issue; it shall not be sufficient to simply object to all fees and expenses.

I. Itemization of Services Rendered and Expenses

A. The time records of Stinson consisting of a daily breakdown of the time speech by each person on each day and narratives of the worked performed are attached as **Exhibit A** to this Fee Statement.

B. The following chart identifies the individuals and their respective titles that provided services during the Statement Period. In includes information regarding their respective billing rates and the total number of hours spent providing services during the Statement Period for which Stinson seeks compensation.

Name of Professional	Title	Rate	Hours	Fees
Nicholas Zluticky	Partner	\$550	99.7	\$54,835.00
Zachary Hemenway	Partner	\$550	10.6	\$5,830.00
Miranda Swift	Associate	\$385	4.0	\$1,540.00
TOTAL			114.3	\$62,205.00

C. The following chart identifies expenses by category.

Expense Category	Expenses
Relativity Database Charges	\$208.85
TOTAL	\$208.85

II. Total Amount Payable

Accordingly, the amount of compensation and expenses payable for this Statement Period is calculated as follows:

Total Fees for Services Rendered During Statement Period	\$62,205.00
Twenty Percent (20%) Holdback	(\$12,441.00)
Fees Minus Holdback	\$49,764.00
Expenses (100%)	\$208.85
TOTAL PAYABLE	\$49,972.85

WHEREFORE, Stinson requests payment of **\$49,972.85** for (i) compensation in the amount of \$49,764.00 in fees (80% of \$62,205.00) on account of actual, reasonable and necessary

professional services rendered to the Committee by Stinson during the Statement Period, and (ii) reimbursement of actual and necessary expenses in the amount of \$208.85 incurred on behalf of the Committee by Stinson.

Dated: August 24, 2024

STINSON LLP

By: /s/ Nicholas Zluticky

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COUNSEL FOR THE COMMITTEE

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 24, 2024, a true copy of the foregoing was served by the Court's CM/ECF notification system, which sent notice of electronic filing to all counsel of record.

s/ Nicholas Zluticky
Counsel for the Committee

EXHIBIT A



1201 Walnut Street, Suite 2900
Kansas City, MO 64106-2150
1.800.846.1201

July 31, 2024

Official Committee of Unsecured Creditors of Tehum
Care Services Inc.
Attn David Barton, Chairman
190 E. Bannock Street
Boise, ID 83712

Invoice No: 43575239
Nicholas Zluticky

Re: Tehum Care Services Inc. Bankruptcy
File No: 3527808.0002

Invoice Summary

Professional services and disbursements rendered through June 30, 2024

Current Professional Services	\$62,205.00
Current Disbursements	\$208.85
Total Current Invoice	\$62,413.85

Stinson LLP**Invoice Detail**

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Timekeeper Summary

Timekeeper	Title	Rate	Hours	Amount
Nicholas Zluticky	Partner	550.00	99.70	54,835.00
Zachary Hemenway	Partner	550.00	10.60	5,830.00
Miranda Swift	Associate	385.00	4.00	1,540.00
Current Professional Services			114.30	\$62,205.00

Professional Services

Date	Task/Act	Description	Hours	Amount
06/03/24	B150	Prepare for (.3) and participate in committee meeting regarding potential settlement agreement (1.2). Nicholas Zluticky	1.50	825.00
06/03/24	B115	Several emails and telephone conversations with committee members, mediator, counsel for debtor and counsel for TCC regarding settlement issues (6.2). Nicholas Zluticky	6.20	3,410.00
06/03/24	B115	Evaluate and follow up on negotiation terms and status (0.6). Zachary Hemenway	0.60	330.00
06/03/24	B150	Prepare for and participate in committee meeting. Zachary Hemenway	0.60	330.00
06/03/24	B150	Attend committee meeting. Miranda Swift	0.90	346.50
06/04/24	B115	Continue work on settlement issues including several telephone conversations and emails with committee members, mediator, counsel for debtor and counsel for TCC. Nicholas Zluticky	9.10	5,005.00
06/04/24	B110	Review, analyze, and discuss proposed counteroffer. Zachary Hemenway	1.80	990.00
06/04/24	B140	Evaluate stay issues and docket. Zachary Hemenway	0.80	440.00
06/04/24	B115	Review docket for pleadings related to June 11 hearing. Miranda Swift	0.20	77.00
06/05/24	B115	Several telephone conversations and emails with mediator, committee members, counsel for debtor and	7.90	4,345.00

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Date	Task/Act	Description	Hours	Amount
		counsel for TCC regarding settlement issues. Nicholas Zluticky		
06/05/24	B115	Follow up on mediation details and additional information from mediator. Zachary Hemenway	1.30	715.00
06/06/24	B115	Several emails and telephone conversations with mediator, committee members, counsel for debtor and counsel for TCC regarding settlement issues. Nicholas Zluticky	6.90	3,795.00
06/07/24	B115	Several emails and telephone conversations with mediator, committee members and counsel for TCC regarding settlement issues. Nicholas Zluticky	9.80	5,390.00
06/07/24	B115	Follow up on status of negotiations and discuss same with committee members and case team. Zachary Hemenway	2.10	1,155.00
06/08/24	B115	Several emails and telephone conversations with committee members and mediator regarding settlement issues. Nicholas Zluticky	3.80	2,090.00
06/10/24	B115	Several emails and telephone conversations with mediator, committee members, and M2 parties regarding settlement proposal. Nicholas Zluticky	6.80	3,740.00
06/10/24	B140	Correspondence regarding stay issues. Zachary Hemenway	0.20	110.00
06/10/24	B140	Follow up on scheduled hearing. Zachary Hemenway	0.70	385.00
06/11/24	B115	Several emails and telephone conversations with committee members, mediator, counsel for debtor and counsel for TCC regarding settlement issues (7.4). Nicholas Zluticky	7.40	4,070.00
06/11/24	B190	Participate in status conference with court (.5). Nicholas Zluticky	0.50	275.00
06/11/24	B110	Call regarding deposition transcripts. Miranda Swift	0.30	115.50
06/12/24	B115	Several emails and telephone conversations with	4.40	2,420.00

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Date	Task/Act	Description	Hours	Amount
		mediator and committee members regarding settlement issues. Nicholas Zluticky		
06/13/24	B115	Several telephone conversations and emails with mediator and committee members regarding settlement issues. Nicholas Zluticky	3.20	1,760.00
06/17/24	B150	Prepare for (0.4) and participate in committee meeting (0.4). Nicholas Zluticky	0.80	440.00
06/17/24	B150	Attend Committee meeting. Miranda Swift	0.40	154.00
06/18/24	B115	Follow up on negotiation status and details from meeting. Zachary Hemenway	0.70	385.00
06/20/24	B160	Communications with accounting regarding invoices (0.1); Review May invoice (0.1). Miranda Swift	0.20	77.00
06/21/24	B430	Review order denying motion for leave to appeal and analyze impact of same (0.4). Nicholas Zluticky	0.40	220.00
06/21/24	B160	Review and edit invoice for May 2024 time. Miranda Swift	0.30	115.50
06/24/24	B115	Emails with committee members regarding mediation status (.4); several emails and telephone conversations with mediator regarding same (1.2); continue to work on alternative plan (2.8). Nicholas Zluticky	4.40	2,420.00
06/24/24	B110	Brief follow up on potential meeting. Zachary Hemenway	0.10	55.00
06/24/24	B150	Committee-related correspondence. Zachary Hemenway	0.20	110.00
06/24/24	B110	Review updated financials. Zachary Hemenway	0.30	165.00
06/24/24	B160	Review and edit May 2024 invoice. Miranda Swift	1.30	500.50

Stinson LLP**Invoice Detail**

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Date	Task/Act	Description	Hours	Amount
06/25/24	B320	Continue work on alternative plan in the event that mediation unsuccessful Nicholas Zluticky	7.40	4,070.00
06/25/24	B160	Draft May 2024 fee statement. Miranda Swift	0.40	154.00
06/26/24	B115	Continue to work on alternative plan in the event mediation is unsuccessful (4.6). Nicholas Zluticky	4.60	2,530.00
06/26/24	B115	Evaluate updated positions on proposal and mediation detail from TCC. Zachary Hemenway	1.20	660.00
06/27/24	B115	Several emails and telephone conversations with mediator and counsel for debtor regarding mediation issues (2.8); continue work on alternate plan (3.3). Nicholas Zluticky	6.10	3,355.00
06/28/24	B115	Continue work on alternate plan. Nicholas Zluticky	8.50	4,675.00
Current Professional Services			114.30	\$62,205.00

Task Code Summary

Task Code	Description	Hours	Amount
B110	Case Administration	2.50	1,325.50
B115	Mediation	95.20	52,327.00
B140	Relief from Stay/Adq Prot. Proceedings	1.70	935.00
B150	Meetings of and Comm. with Creditors	4.40	2,205.50
B160	Fee/Employment Applications	2.20	847.00
B190	Other Contested Matters	0.50	275.00
B320	Plan/Disclosure Statement Incl. Bus Plan	7.40	4,070.00
B430	Appeals	0.40	220.00
Current Professional Services		114.30	\$62,205.00

Stinson LLP

Invoice Detail

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Disbursements

Date	Description	Amount
	Relativity Database Charges	208.85
Total Disbursements		\$208.85