

**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, )

**CERTIFICATE OF NO OBJECTION TO THE APPLICATION FOR ORDER  
APPROVING MOTION BY CREDITOR KRISTINE WILLIAMS FOR LEAVE TO FILE  
UNTIMELY PROOF OF CLAIM**

Pursuant to the *Procedures for Complex Chapter 11 Cases in the Southern District of Texas*, the undersigned attorneys of Creditor, Kristine Williams (“Creditor”), certifies as follows.

1. On August 6, 2024, the Creditor filed her Amended Motion for Leave to File Untimely Proof of Claim (“the Motion”),<sup>1</sup> and supporting documentation including her Exhibit A Proof of Claim. (Doc. No. 1648).

2. The Motion was electronically filed with the Court using the CM/ECF system, which served notification to all parties of interest authorized to receive electronic notice in this case. (Doc. No. 1648).

3. The deadline for parties to file responses to the Motion was August 21, 2024 (the “Objection Deadline”). No responses to the Motion were filed on the docket on or before the Objection Deadline. Additionally, the undersigned counsel did not receive informal responses to the Motion.

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<sup>1</sup> Creditor’s Motion contains an error. Creditor did not engage counsel in March 2024. In April 2024, Creditor joined employees 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 Decedent. Following joinder of parties to her claim for wrongful death, Creditor discovered this bankruptcy proceeding and that the deadline for filing proofs of claim had passed without her receiving notice.



4. Accordingly, the Creditor requests that the Court enter the Order attached hereto at the earliest convenience of the Court.

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  
Facsimile: 417/890-8855  
Email: [apihana@hallansley.com](mailto:apihana@hallansley.com)  
Email: [tricker@hallansley.com](mailto:tricker@hallansley.com)

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

The undersigned certifies that on the 4<sup>th</sup> day of September, 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

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TEHUM CARE SERVICES, INC., ) Case No.: 23-90086 (CML)  
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**ORDER GRANTING MOTION BY CREDITOR KRISTINE WILLIAMS FOR  
LEAVE TO FILE UNTIMELY PROOF OF CLAIM**

Upon consideration of the Motion by Creditor Kristine Williams for Leave to File Untimely Proof of Claim (the “Motion”), any response thereto, and for good cause shown, it is on this \_\_\_ day of \_\_\_\_\_, 2024, hereby ORDERED, that the Motion is GRANTED; and it is further

ORDERED, that Creditor’s Proof Claim attached to the Motion as **Exhibit A** is deemed filed as of August 6, 2024.

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Christopher M. Lopez  
United States Bankruptcy Judge