

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

In re:

TEHUM CARE SERVICES, INC.,¹

Debtor.

Chapter 11

Case No. 23-90086 (CML)

Re: Docket No. 1650

**CERTIFICATE OF NO OBJECTION TO THE SECOND INTERIM FEE
APPLICATION OF BROWN RUDNICK LLP FOR COMPENSATION FOR SERVICES
RENDERED AND FOR REIMBURSEMENT OF EXPENSES INCURRED AS
CO-COUNSEL TO THE OFFICIAL COMMITTEE OF TORT CLAIMANTS
FOR THE PERIOD FROM APRIL 1, 2024, THROUGH JUNE 30, 2024**

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

1. On August 8, 2024, Brown Rudnick LLP ("**Brown Rudnick**") filed its Second Interim Fee Application of Brown Rudnick LLP for Compensation for Services Rendered and for Reimbursement of Expenses Incurred as Co-Counsel to the Official Committee of Tort Claimants for the Period from April 1, 2024, through June 30, 2024 [Dkt. No. 1650] (the "**Application**").

2. Brown Rudnick filed the proposed Order Granting Second Interim Fee Application of Brown Rudnick LLP for Compensation for Services Rendered and for Reimbursement of Expenses Incurred as Co-Counsel to the Official Committee of Tort Claimants for the Period from April 1, 2024, through June 30, 2024 [Dkt. No. 1650-4] (the "**Proposed Order**").

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.



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3. The Application and Proposed Order were 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. *See* Dkt. No. 1650.

4. The deadline for parties to file responses to the Application was August 29, 2024 (the “**Objection Deadline**”). No responses to the Application were filed on the docket on or before the Objection Deadline. Additionally, Brown Rudnick has not received any informal responses to the Application providing a basis as to why the Application should not be granted.

5. Based on the foregoing, Brown Rudnick requests that the Court enter the Order attached hereto as **Exhibit A** at the earliest convenience for the Court.

Dated: September 13, 2024
New York, NY

Respectfully submitted,

BROWN RUDNICK LLP

/s/ Eric R. Goodman

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Co-Lead Counsel to the Tort Claimants' Committee

6.

CERTIFICATE OF SERVICE

I certify that on September 13, 2024, I caused a true and correct copy of the foregoing document to be served by the Court's CM/ECF notification system, which will send notice of electronic filing to all counsel of record.

/s/ Eric R. Goodman

Eric R. Goodman

EXHIBIT A

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

In re:

TEHUM CARE SERVICES, INC.,¹

Debtor.

Chapter 11

Case No. 23-90086 (CML)

Re: Docket No. 1650

**ORDER GRANTING SECOND INTERIM FEE APPLICATION
OF BROWN RUDNICK LLP FOR COMPENSATION FOR SERVICES
RENDERED AND FOR REIMBURSEMENT OF EXPENSES INCURRED AS
CO-COUNSEL TO THE OFFICIAL COMMITTEE OF TORT CLAIMANTS
FOR THE PERIOD FROM APRIL 1, 2024, THROUGH JUNE 30, 2024**

The Court has considered the *Second Interim Fee Application of Brown Rudnick LLP for Compensation for Services Rendered and for Reimbursement of Expenses as Co-Counsel to the Official Committee of Tort Claimants for the Period from April 1, 2024, through June 30, 2024* (Dkt. No. 1650) (the “Application”) filed by Brown Rudnick LLP (the “Applicant”). The Court hereby orders that:

1. The Applicant is allowed interim compensation and reimbursement of expenses in the amount of \$566,395.31 for the period April 1, 2024 through June 30, 2024.
2. The Debtor is authorized to disburse any unpaid amounts allowed by Paragraph 1 of this Order.
3. Notwithstanding Bankruptcy Rule 6004(h), the terms and conditions of this Order are immediately effective and enforceable upon entry.
4. All time periods set forth in this Order shall be calculated in accordance with Bankruptcy Rule 9006(a).

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.

5. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: _____, 2024

Christopher López
United States Bankruptcy Judge