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

IN RE: Tehum Care Services, Inc., Debtor.

Case No. 23-90086 (CML)

Chapter 11

OBJECTION TO DISCLOSURE STATEMENT

The Estate of Kerrie Milkiewicz states as follows:

The Estate of Kerry Milkiewicz ("Milkiewicz") hereby concurs in the Objection to Disclosure Statement filed by Kohchise Jackson and others – Docket Number 1027. In particular, Milkiewicz objects to the fact that the Debtor made no effort to value its avoidance actions as part of its disclosures. These are by far the most valuable assets of the bankruptcy estate.

In addition, the Debtor failed to make any disclosure about the fact that the mediator that helped bring about the "global settlement" may have had a conflict of interest because of a relationship he has or had with YesCare's counsel.

WHEREFORE, Milkiewicz respectfully requests that this Honorable Court deny preliminary approval of the Debtor's Plan and Disclosure Statement.

Dated: October 16, 2023

Respectfully submitted, Kenneth R. Beams, PLLC.

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