

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re

WINDSTREAM HOLDINGS, INC.,

Debtor.
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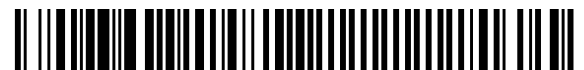
Chapter 11

Case No. 19-22312 (RDD)

**BOBBIE S. TINDLE’S MOTION PURSUANT TO 11 U.S.C. § 362(d) TO
MODIFY THE AUTOMATIC STAY IMPOSED BY 11 U.S.C. § 362(a)**

COMES NOW Movant, Bobbie S. Tindle, by and through her attorney of record, Donald M. Brown of Douglas, Haun & Heidemann, P.C., and pursuant to 11 U.S.C. § 362(d) respectfully requests this Court to lift the automatic stay imposed by 11 U.S.C. § 362(a) to permit Movant to litigate her personal injury tort claim presently pending in the Circuit Court of Polk County Missouri, Case No. 18PO-CC00004, against Windstream Services, LLC, Windstream Communications, LLC, and Windstream Missouri, LLC¹, collectively referred to hereinafter as “Windstream”. Movant stipulates that her recovery pursuant to any judgment rendered in her favor in the Missouri case shall be limited to the proceeds of the applicable insurance policy maintained by Windstream. In support of her request, Movant files her suggestions in support contemporaneously herewith, and incorporates same by reference as if set out fully herein. This motion is filed at least 21 days prior to the omnibus hearing scheduled for this case on May 14, 2019. Movant respectfully requests the Court take this motion up at said hearing.

¹ The individual case numbers in United States Bankruptcy Court for the Southern District of New York for these entities are as follows: Windstream Services, LLC – Case No. 19-22400; Windstream Communications, LLC – Case No. 19-22433; and Windstream Missouri, LLC – Case No. 19-22506.



WHEREFORE, Movant respectfully requests that the Court grant her relief from the automatic stay pursuant to 11 U.S.C. § 362(d) and for such other relief as the Court deems just and proper.

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/s/ Donald M. Brown

By _____
Donald M. Brown (admitted *Pro Hac Vice*)
Missouri Bar No. 57652
Attorney for Movant Bobbie S. Tindle

CERTIFICATE OF SERVICE

I hereby certify that on April 23, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all attorneys of record.

DOUGLAS, HAUN & HEIDEMANN, P.C.

By _____ /s/ Donald M. Brown