

**IN THE STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

IN RE:)	
)	
CURAE HEALTH INC. et al.)	CASE NO: 3:18-bk-05665
)	CHAPTER 11
Debtor.)	JUDGE, CHARLES M. WALKER
)	
_____)	
)	
KAYLA WALLACE,)	
)	
Movant,)	
)	
CURAE HEALTH INC., et al.)	
)	
Respondents.)	
)	

MOTION FOR RELIEF FROM AUTOMATIC STAY

Kayla Wallace, (hereinafter “Movant”), by and through her attorney, respectfully requests that the Court grant her relief from the automatic stay provisions of 11 U.S.C. § 362. In support of this Motion, the Movant states as follow:

1. Curae Health Inc., et al (the Debtor) commenced this bankruptcy case by filing a Petition under Chapter 11 of the U.S. Bankruptcy Code in this Court on August 24, 2018.
2. No Trustee has been appointed in this matter and the Debtor is managing their operation as Debtor in possession.
3. Movant is a Post-Petition unsecured creditor of Debtor.
4. During the course of this bankruptcy Debtor violated Title VII of the Civil Rights Act of 1964 as amended (“Title VII’) for discrimination and for retaliation.
5. Movant needs to proceed under Title VII of the Civil Rights Act of 1964 (as amended) by filing a lawsuit against the Debtor to proceed with the enforcement of her rights under Title VIII and applicable non-bankruptcy law.

6. Movant is entitled to relief from the stay of 11 U.S.C. § 362 because of the post-petition debt.

WHEREFORE, Movant requests the entry of an Order granting Movant relief from the automatic stay provisions of 11 U.S.C. § 362 to permit Movant to proceed with a lawsuit pursuant to Title VII and applicable non-bankruptcy law, and for such other and further relief to which Movant may be justly entitled.

Respectfully submitted,

Signature: /s/Ronald K. Nevin

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and exact copy of the foregoing has been furnished by U. S. Mail, postage prepaid, to the Office of the U. S. Trustee, Room 318, Customs House, 701 Broadway, Nashville, Tennessee, 37203, Michael Anthony Malone, Polsinelli PC, 401 Commerce Street, Suite 900, Nashville, TN 37219, address as shown, this 20th day of May 2020.

/s/ Ronald K. Nevin

Ronald K. Nevin

**IN THE STATES BANKRUPTCY COURT
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IN RE:

CURAE HEALTH INC., et al

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CASE NO: 3:18-bk-05665

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JUDGE, CHARLES M. WALKER

KAYLA WALLACE,

Movant,

CURAE HEALTH INC., et al

Respondents.

ORDER GRANTING RELIEF FROM AUTOMATIC STAY

It appearing to the Court that on May 20, 2020, the creditor filed their motion for relief from automatic stay and it further appearing to the Court that no timely opposition was filed or any objection raised was withdrawn or overruled by the Court at the Scheduled Hearing.

IT IS THEREFORE ORDERED that the automatic stay in 11 U.S.C. § 362 is terminated, as to Movant.

IT IS SO ORDERED.

This order was signed and entered electronically as indicated at the top of the first page

U. S. BANKRUPTCY JUDGE
HONORABLE CHARLES M. WALKER

Approved for Entry:

/s/Ronald K. Nevin

Ronald K. Nevin, B.P.R. 3463

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