

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

In re:	§	CASE NO. 18-30777 (HDH)
	§	(Jointly Administered)
4 WEST HOLDINGS, INC.	§	
	§	CHAPTER 11
REORGANIZED DEBTORS.	§	

**BRUCE CLARK, AS EXECUTOR OF THE ESTATE OF WILLIAM MASON,
DECEASED'S RESPONSE TO TRUST CLAIMANTS TRUSTEE'S OBJECTION TO
CLAIM**

COMES NOW, Bruce Clark, as Executor for the Estate of William Mason, Deceased (“**Claimant**”), by and through the undersigned attorneys, and files this Response to Tort Claimants Trustee’s Objection to Claim No. 374 filed by Bruce Clark, as Executor of the Estate of William Mason, Deceased [Dkt. No. 1751] showing the Court as follows:

1. Claimant admits the allegation contained in paragraph 1 of the objection.
2. Claimant admits the allegation contained in paragraph 2 of the objection.
3. Claimant admits the allegation contained in paragraph 3 of the objection.
4. Claimant admits the allegation contained in paragraph 4 of the objection.
5. Claimant admits the allegation contained in paragraph 5 of the objection.
6. Claimant admits the allegation contained in paragraph 6 of the objection.
7. Claimant admits the allegation contained in paragraph 7 of the objection.
8. Claimant admits the allegation contained in paragraph 8 of the objection.
9. Claimant admits the allegation contained in paragraph 9 of the objection.
10. Claimant denies the allegation contained in paragraph 10 of the objection.
 - a. Claimant denies the allegation contained in paragraph 10(a) of the objection.

- b. Claimant denies the allegation contained in paragraph 10(b) of the objection.
- c. Claimant denies the allegation contained in paragraph 10(c) of the objection.
- d. Claimant denies the allegation contained in paragraph 10(d) of the objection.
- e. Claimant denies the allegation contained in paragraph 10(e) of the objection.
- f. Claimant denies the allegation contained in paragraph 10(f) of the objection.

11. Claimant denies the allegation contained in paragraph 11 of the objection.

12. There are no allegations contained in paragraph 12 of the objection to admit or deny; to the extent there are allegations that require admitting or denying, Claimant denies the allegations.

WHEREFORE, PREMISES CONSIDERED, Claimant respectfully requests that (i) the Objection to Claim of Bruce Clark, as Executor of the Estate of William Mason, Deceased, be denied; (ii) that the Claim of Bruce Clark, as Executor of the Estate of William Mason, Deceased, be allowed; and (iii) for such other relief as may be appropriate.

DATED: November 4, 2019.

Respectfully submitted,

By: //s// Branch M. Sheppard
Branch M. Sheppard
TBA No. 24033057
bsheppard@gallowaylawfirm.com
Annarose M. Harding
TBA No. 24071438
aharding@gallowaylawfirm.com
Galloway, Johnson, Tompkins, Burr & Smith
1301 McKinney, Suite 1400
Houston, Texas 77010
(713) 599-0700 (Telephone)
(713) 599-0777 (Facsimile)
ATTORNEYS FOR CLAIMANT

CERTIFICATE OF SERVICE

I hereby certify that I have on this 4th day of November, 2019, caused a copy of the foregoing to be served upon all parties consenting to electronic service pursuant to the Electronic Case Management system of the United States Bankruptcy Court for the Northern District of Texas.

//s// Branch M. Sheppard
Branch M. Sheppard