

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:

Keinesha S. Cox,

Debtor.

Chapter 7

No. 25-00821

The Honorable Deborah L. Thorne

**STIPULATION AND AGREED ORDER DISMISSING CASE, BARRING FUTURE  
FILINGS, AND REQUIRING RETURN OF ATTORNEY'S FEES**

This Stipulation and Agreed Order Dismissing Case, Barring Future Filings, and Requiring Disgorgement of Attorney's Fees (the "**Agreed Order**") is made by and among Adam G. Brief, the Acting United States Trustee for the Northern District of Illinois (the "**U.S. Trustee**"); Keneisha S. Cox, the debtor in the above-captioned case (the "**Case**"); and The Semrad Law Firm, LLC ("**Semrad**" and with the U.S. Trustee, Ms. Cox, and Semrad, the "**Parties**").

THE PARTIES HEREBY STIPULATE:

A. On January 20, 2025 (the "**Petition Date**"), Mitchell Shanks, a Semrad attorney, filed Ms. Cox's voluntary petition for relief under chapter of title 11 of the United States Code (the "**Bankruptcy Code**"), thereby commencing the Case.

B. The Case is Ms. Cox's eleventh bankruptcy case filed in the United States Bankruptcy Court for the Northern District of Illinois (the "**Court**"). Attorneys from Semrad represented Ms. Cox in two of her eleven prior cases.

C. On November 1, 2018, the Court entered an order (the "**Restricted Filer Order**") in Miscellaneous Proceeding 18-90003, attached as **Exhibit A**, declaring Ms. Cox to be a "restricted filer" pursuant to Local Bankruptcy Rule 9029-4 due to her abuse of the processes of the Court and barring her from filing any documents with the Court for eight years. The Order

further provided that, after four of the eight years had passed, Ms. Cox would be allowed to seek Court permission to file not more than every two years.

D. Ms. Cox was served with a copy of the Restricted Filer Order and the Restricted Filer Order was entered on the docket of each of her prior cases and served via ECF on counsel of record and all registered ECF users who had previously filed a document in those cases. *See* United States Bankruptcy Court Northern District of Illinois Administrative Procedures for the Case Management/Electronic Case Filing System, § II.B.3.a.

E. On March 28, 2023, Ms. Cox sought and received Court permission to file. On April 21, 2023, she filed Case No. 23-05821, which was dismissed on June 14, 2023 with an additional bar order on the motion of the chapter 13 trustee assigned to the case.

F. Ms. Cox did not seek permission to file this Case, which was filed less than two years after she last sought Court permission to file. Ms. Cox knowingly filed this Case in contempt of the Restricted Filer Order.

G. Mr. Shanks, who included information regarding three of Ms. Cox's prior cases in the Petition, should have known about the Restricted Filer Order. Mr. Shanks filed the Petition in contempt of the Restricted Filer Order and in violation of Federal Rule of Bankruptcy Procedure 9011.

THE PARTIES HEREBY AGREE THAT:

1. This Case is dismissed for cause pursuant to 11 U.S.C. § 707(b).
2. To the extent it has not already done so, Semrad must return all fees received from Ms. Cox in connection with the Case and return those fees to Ms. Cox. Semrad must forfeit any fees remaining to be paid by Ms. Cox in connection with the Case.
3. Semrad must file an accounting of all fees returned, refunded, and forfeited in

connection with this Case by April 10, 2025.

4. Ms. Cox is hereby barred from filing any document with the Court for one year in addition to the time remaining under the Restricted Filer Order. The Restricted Filer Order expires on November 1, 2026. Ms. Cox is barred from all filings until November 1, 2027 and may not seek Court permission to file while either of the Restricted Filer Order or this Agreed Order are in effect.

Dated: March 27, 2025

ADAM G. BRIEF, Acting United States  
Trustee for the Northern District of Illinois

Keinesha S. Cox

/s/ Karen V. Newbury  
One of His Attorneys

Keinesha S. Cox  
Debtor

THE SEMRAD LAW FIRM, LLC

By: Meagan S. Sells  
Its:

ENTERED:

Dated: April 3, 2025

Deborah L. Thorne  
THE HONORABLE DEBORAH L. THORNE

UNITED STATES BANKRUPTCY JUDGE