

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

In re:	)	
	)	Chapter 11
	)	
TEHUM CARE SERVICES, INC., <sup>1</sup>	)	Case No. 23-90086 (CML)
	)	
Debtor.	)	
	)	

**SUPPLEMENTAL CERTIFICATE OF SERVICE**

1. I, Heather Fellows, depose and say that I am employed by Kurtzman Carson Consultants, LLC dba Verita Global (“**Verita**”), the claims and noticing agent for the Debtors in the above-captioned case. I submit this Supplemental Certificate in connection with the service of solicitation materials for the *Joint Chapter 11 Plan of the Tort Claimants' Committee, Official Committee of Unsecured Creditors, and Debtor* (Docket No. 1739) (the “**Plan**”) and the *Disclosure Statement Regarding Joint Chapter 11 Plan of the Tort Claimants' Committee, Official Committee of Unsecured Creditors, and Debtor* (Docket No. 1740) (the “**Disclosure Statement**”). I am over the age of 18 and not a party to this action. Except as otherwise noted, I could and would testify to the following based upon my personal knowledge.

2. On March 3, 2023, the Court entered the *Order Authorizing the Employment and Retention of Kurtzman Carson Consultants LLC as Claims, Noticing, and Solicitation Agent* (Docket No. 115).

3. Consistent with its retention as claims and noticing agent, Verita is charged with, among other things, printing and distributing Solicitation Packages<sup>2</sup> to creditors and other interested parties pursuant to the solicitation procedures within the *Order (I) Approving Disclosure Statement and Form and Manner of Notice of Hearing Thereon, (II) Establishing Solicitation Procedures, (III) Approving Form and Manner of Notice to Claim Holders (IV) Approving Form of Ballots, (V) Approving Form, Manner, and Scope of Confirmation Notices, (VI) Establishing Certain Deadlines in Connection with Approval of Disclosure Statement and Confirmation of Plan, and (VII) Granting Related Relief* (Docket No. 1813) (the “**Solicitation Procedures Order**”) entered on November 13, 2024.

4. The Solicitation Package consists of the following materials:

a. either a USB Flash Drive (the “**USB**”) containing the following documents:

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<sup>1</sup> The last four digits of the Debtor’s federal tax identification number is 8853. The Debtor’s service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.

<sup>2</sup> Terms not otherwise defined herein shall have the same meanings ascribed to them in the Solicitation Procedures Order



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- i. the Solicitation Procedures (substantially in the form attached as **Exhibit 1** to the Solicitation Procedures Order); and
  - ii. the Disclosure Statement (with all exhibits, including the Plan);
- b. or a paper copy of the Solicitation Procedures and the Disclosure Statement (with all exhibits, including the Plan);
- c. Notice of Hearing to Consider Confirmation of Joint Chapter 11 Plan of Reorganization of the Tort Claimants' Committee, Official Committee of Unsecured Creditors, and Debtor (the "**Confirmation Hearing Notice**") (substantially in the form attached as **Exhibit 4-1** to the Solicitation Procedures Order);
- d. the Solicitation Procedures Order (without exhibits);
- e. an Opt-Out Release Form for Holders of All Claims (the "**Opt-Out Release Form**") (substantially in the form attached as **Exhibit 2** to the Solicitation Procedures Order);
- f. a copy of the appropriate Ballot(s) and voting instructions for the voting class in which the creditor is entitled to vote:
  - i. Ballot for Holders of Claims in Class 3 (Convenience Class) ("**Class 3 Ballot**") (substantially in the form attached as **Exhibit 3-1** to the Solicitation Procedures Order);
  - ii. Ballot for Holders of Claims in Class 4 and Class 5 (Channeled General Unsecured Claims and Opt-Out General Unsecured Claims) ("**Class 4 and 5 Ballot**") (substantially in the form attached as **Exhibit 3-2** to the Solicitation Procedures Order);
  - iii. Ballot for Holders of Claims in Class 6, Class 7, and Class 8 (Channeled PI/WD Claims, Opt-Out PI/WD Claims, and Opt-Out Insured PI/WD Claims) ("**Class 6, 7, and 8 Ballot**") (substantially in the form attached as **Exhibit 3-3** to the Solicitation Procedures Order);
  - iv. Ballot for Holders of Claims in Classes 9 and 10 (Channeled Indirect Claims and Opt-Out Indirect Claims) ("**Class 9 and 10 Ballot**") (substantially in the form attached as **Exhibit 3-4** to the Solicitation Procedures Order);
- g. if applicable, a letter from the TCC urging such claimants to vote to accept the Plan (the "**TCC Letter**") (substantially in the form attached as **Exhibit 4-5** to the Solicitation Procedures Order);
- h. if applicable, a letter from the UCC urging such claimants to vote to accept the Plan (the "**UCC Letter**") (substantially in the form attached as **Exhibit 4-6** to the Solicitation Procedures Order); and

- i. a pre-addressed, postage pre-paid return envelope (the “**Return Envelope**”).
5. The Non-Voting Package consists of the following documents:
  - a. the Notice of Non-Voting Status (the “**Notice of Non-Voting Status**”) (substantially in the form attached as **Exhibit 4-3** to the Disclosure Statement Order);
  - b. the Opt-Out Release Form;
  - c. Confirmation Hearing Notice; and
  - d. a Return Envelope.
6. The Contract and Lease Counterparties Package consists of the following document:
  - a. the Notice of Contract and Lease Counterparties (the “**Contract Lease Notice**”) (substantially in the form attached as **Exhibit 4-4** to the Disclosure Statement Order).
7. On November 19, 2024, links to the following documents were made available on the public access website of [www.veritaglobal.net/tehum](http://www.veritaglobal.net/tehum):
  - a. Solicitation Procedures Order;
  - b. Disclosure Statement;
  - c. Plan;
  - d. TCC Letter;
  - e. UCC Letter;
  - f. Solicitation Procedures; and
  - g. Confirmation Hearing Notice.
8. On or before December 31, 2024, at my direction and under my supervision, employees of Verita caused the Confirmation Hearing Notice to be served per postal forwarding address via First Class Mail upon the service list attached hereto as **Exhibit A**.

Dated: January 16, 2025

/s/ Heather Fellows  
Heather Fellows  
Verita  
222 N Pacific Coast Highway,  
3rd Floor  
El Segundo, CA 90245  
Tel 310.823.9000

## **Exhibit A**

**Exhibit A**

**Creditor Matrix**

**Served via First Class Mail**

CreditorName	Address1	City	State	Zip
Beister, Heather D.	Address on File			
Cheryl Cole Green	Address on File			
Cheryl P. Cole-Green	Address on File			
Cynthia D. Smith	Address on File			
Stormi Moeller	Address on File			