Page 1 of 2 Sean Rogers #33279, WMCI, 7076 Road 55F. Torrington, WY 82240

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF **TEXAS HOUSTON DIVISION** 515 RUSK AVE. 5th Floor **HOUSTON, TX. 77002**

**United States Courts** Southern District of Texas FILED

JUL 1 1 2025

Nathan Ochsner, Clerk of Court

In re: TEHUM CARE SERVICES, INC. et §

al Debtor

Vs.

Sean Rogers #33279

WMCI

7076 Road 55F

Torrington, WY 82240

Chapter 11

Date 6/18/25

Related Cases: CV-2023-56

Carbon County WY. No. CV-2024-88

§ U.S. WY. District No.24-cy-00214-ABJ

§ TX. Bankruptcy No.23bk90086

## RENEWED MOTION TO STAY CASE UNDER (F.R.CIV.P.15)

**COMES NOW** the Petitioner, Sean Rogers, *In Propria Persona*, and respectfully moves the court to take judicial notice in the interest of justice pursuant to (F.R.CIV.P.15) for the following reasons:

- 1. Plaintiff is an unsecured discrimination and medical malpractice victim.
- 2. Petitioner was informed he was enjoined.[see attached ECF 47-1pg.2 last paragraph footnote (1)] with a disclaimer "Allowed"
- 3. This honorable court issued a nationwide injunction; however I have UNlitigated claims protected under the U.S. constitution, State statutes of limitations [2years] up to June 2026 for YesCares last day of abuse towards me was June 2024. I feel like I'm being alienated from my civil rights guaranteed under the 7<sup>th</sup> amendment by subverting the promulgatory process regarding a jury trial.
- 4. Plaintiff Reserves right to assert additional claims as further investigation and discovery warrant.
- 5. I know the Attorneys are wanting to be forthcoming and centralize administration by ensuring an orderly and equitable distribution of the debtors assets. They aim to treat all creditors fairly, and potentially discharge debts. I need to know the intentions of the debtor:
  - A. Discharge my debt

or

- B. Settle
  - I. So I can seek relief from "lift" The Automatic stay Nationwide <u>injunction</u> and request the Wyoming court withdraw the reference above to peruse my claim in a court that can provide a jury trial in compliance with my constitutional rights.

## Case 23-90086 Document 2356 Filed in TXSB on 07/11/25 Page 2 of 12

Page 2 of 2 Sean Rogers #33279, WMCI, 7076 Road 55F, Torrington, WY 82240

**WHEREFORE**, Petitioner respectfully moves this Honorable Court to stay the case till my statute of limitations runs June 2026 or I settle out of court with the Debtor as noted above.

This is an affidavit of the forgoing; Factual allegations, Damages, and legal claims said here in and asserted by Sean Rogers. Under penalty of perjury under united states laws that my statements on this form are true and correct (28 U.S.C.§ 1746 & 18 U.S.C.§1621)

Sean Rogers #33279 / In Propria Personal UNTRAINED LITIGANT

WMCI

7076 Road 55F

Page 1 of 2 Sean Rogers #33279, WMCI, 7076 Road 55F, Torrington WY. 82240

# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

515 RUSK AVE. 5<sup>th</sup> Floor HOUSTON, TX. 77002

In re: TEHUM CARE SERVICES, INC. et	§	
al Debtor	§	Chapter 11
	§	•
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Vs. Sean Rogers #33279 

§ Date 5/21/25

WMCI

Related Cases: CV-2023-56

Carbon County WY. No. CV-2024-88

7076 Road 55F 

\$\text{ U.S. WY. District No.24-ev-00214-ABJ}\$

Torrington, WY 82240 

\$\text{ TX. Bankruptcy Case#23bk90086}\$

## NOTICE FOR CLERK TO SEND CORASPONDANTS

**COMES NOW** the Petitioner, Sean Rogers, *In Propria Persona*, and respectfully moves the honorable court clerk to mail me the correspondences in the above caption bankruptcy case for, I do not have access to E-File, my documents, therefore I need fair notice and service of the corresponding documents that pertain to me only.

- 1. I have not gotten an answer; from the attorney who used the nationwide injunction, my motion to stay i sent the court. I have not gotten any answers from the attorney who sent me a letter or the honorable court. Please see my renewed motion to stay and I sent other attorneys letters.
- 2. With all due respect; this court posting stuff on a public forum doesn't help me, it helps the court who has unlimited resources, unlike me, I need proper notice and service.
- 3. I make .35 cents an hour if I could work, which I can't due to my disability therefore, I'm disparaged.
- 4. Would this honorable clerk ask this judge to write a letter encouraging the law librarian here to allow me as an inmate to E-File with the law librarian here to you directly, to help me with postage, paper, ink, etc.?

WHEREFORE, Petitioner respectfully moves this Honorable Court clerk to send me documents concerning me only as noted above.

## Case 23-90086 Document 2356 Filed in TXSB on 07/11/25 Page 4 of 12

Page 2 of 2 Sean Rogers #33279, WMCI, 7076 Road 55F, Torrington WY. 82240

This is an affidavit of the forgoing; Factual allegations, Damages, and legal claims said here in and asserted by Sean Rogers. Under penalty of perjury under united states laws that my statements on this form are true and correct (28 U.S.C.§ 1746 & 18 U.S.C.§1621)

Sean Rogers #33279 / In Propria Persona/ UNTRAINED LITIGANT

WMCI

7076 Road 55F

Page 1 of 6 Sean Rogers #33279, WMCI, 7076 Road 55F, Torrington, WY 82240

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION 515 RUSK AVE. 5<sup>th</sup> Floor HOUSTON, TX. 77002

In re: TEHUM CARE SERVICES, INC. et	§
al Debtor	§
	§
	§ Chapter 11
Vs.	§
	§ Date 6/18/25
Sean Rogers #33279	8 Related Cases: CV-2023-56 Carbon County WY. No. CV-2024-88
WMCI	§ U.S. WY. District No.24-cv-00214-ABJ
7076 Road 55F	§ TX. Bankruptcy Case#23bk90086
Torrington, WY 82240	<b>§ U.S. TX. District No. 4:24-cv-01607</b>

## PROOF OF CLAIM UNDER (FED.R.BANKR.P.§3003)

**COMES NOW** the Petitioner, Sean Rogers, *In Propria Persona*, and respectfully moves this honorable court to take judicial notice in the interest of justice pursuant to (Fed.R.Bankr.P.§3003).

### 1. Total Amount of claim: \$2,500,000.00

- **A. Total artificial heart replacement:** the cost of my heart replacement will be substantial, it will cost approx.  $$1,500,000.\frac{00}{2}$$  this figure includes various components, such as:
  - > Pre transplant evaluation and testing: before transplant I will undergo a series of tests for the procedure.
  - > Surgery costs: this includes fees for the surgical team, operating room, anesthesia, and other related expenses.
  - ➤ Hospital stay: I will spend the night at the hospital before and after the surgery, which contributes to overall cost.
  - ➤ Post-operative care and medication: after the transplant, I will require ongoing care, including immunosuppressive medication to prevent organ rejection, regular follow-up appointment and monitoring.
  - > Rehabilitation and recovery: I will need physical therapy and other forms of rehabilitation to aid in recovery.

Page 2 of 6 Sean Rogers #33279, WMCI, 7076 Road 55F, Torrington, WY 82240

**B.** Pain and Suffering: I went through 2 years of abuse totaling \$1,000,000.

#### 2. Basis for claim:

A. I am a victim of willful and wanton malicious injury, deliberate indifference, cruel and unusual punishment medical malpractice and discrimination in violation of the Rights and protections guaranteed under; Title VII of the Civil Rights Act of 1964 et. seq. [8<sup>th</sup> amendment], and the Americans with Disabilities Act of 1990 et. seq. [42 U.S.C.S. §12101 et. seq.].Committed by Corrizon and YesCare, which also constitutes a violation of my civil rights under (42U.S.C.S.§1983). the malpractice occurred on 2021-2023, and has resulted in; permanent Physical deterioration to my heart [heart efficacy went from 60% tile to 40% tile], mental anguish, atrophied heart, shortened life span, and severe depression.

#### 3. Supporting documentation:

- A. Incorporate by reference all related cases in caption above between 2021-2023 and medical records filed as evidence in the cases captioned above.
- B. See attached form 410 below

Fill in this information to identify the case:	
Detroi 1 JEHUM CARE SERVICES, INC. et al.	
Debtor 2 UNITED STATES PANKRURTCY COURT SOUTHER Stormer, 4 ting) 515 RUSK AVE, 5th Floor HOUSTON, TX, 77002 United States Barkeuppey Court for the	N DISTRICT OF TEXAS HOUSTON DIVISION
Case surries: U.S. TX. District No. 4:24 cov@1607	

#### Official Form 410

### **Proof of Claim**

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be filed up to \$500,000, imprisoned for up to 5 years, or both, 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim						
1.	Who is the current creditor?	Sean Rogers  Name of the current creditor (the person or entity to be peed for this claim)  Other names the creditor used with the debtor				
2.	Has this claim been acquired from someone else?	M No O Yes. From whom?				
	Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? Where should payments to the creditor be sent? (If different)  Sean Rogers #33279 Sean Rogers  WMCI 98.95 wedgewood dr.  7076 Road 55F  Torrington, WY 82240 Highlands Ranch CO  Contact phone 801-26  Contact enter Contact enter 12 physical enter 12 physical enter 12 physical enter 13 physical enter 14 physical enter 14 physical enter 14 physical enter 15 physic				
4	Does this claim amend one already filed?	X No ☐ Yes. Claim number on court daims registry (if known) F(ed on MAN / CO / YYYY				
5.	Do you know if anyone else has filed a proof of claim for this claim?	No Yes. Who made the earlier fling?				

Official Form 410

Proof of Claim

page 1

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Page 4 of 6 Sean Rogers #33279, WMCI, 7076 Road 55F, Torrington, WY 82240

B S		n About the Claim as of the Date the Case Was Filed		
0	you use to identify the debtor?	No Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor:		
7.	How much is the claim?	S.\$2,500,000  Does this amount include interest or other charges?  No  Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).		
8.	What is the basis of the claim?	Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.  Altach reducted copies of any documents supporting the claim required by Bankruptcy Rule 3001(e).  Limit disclosing information that is estitled to privacy, such as health care information.  This honorable court can have any attachments in the following related cases:  Personal injury Related Cases: CV-2023-56  Carbon County WY. No. CV-2024-88		
	Is all or part of the claim secured?	No Yes. The claim is secured by a fen on property.  Nature of property:  Real estate. If the claim is secured by the debtor's principal residence, file a Mortgage Proof of Claim Altachment (Official Form 410-A) with this Proof of Claim.  Motor valued  Other, Describe:  Basis for perfection:  Altach reducted copies of documents, if any, that show evidence of perfection of a security interest for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the fen has been filed or recorded.)  Value of property:  \$ Amount of the claim that is secured:  \$ Amount of the claim that is unsecured: \$  Amount necessary to cure any default as of the date of the petition: \$  Annual Interest Rate (whee case was filed)  %		
<b>t</b> 0.	Is this claim based on a lease?	☐ Fixed ☐ Veriable  X No ☐ Yes. Amount necessary to cure any default as of the date of the petition.  S		
<b>*1</b> ,	Is this claim subject to a right of setoff?	X No ☐ Yes. Identify the property:		

Official Form 410

# Case 23-90086 Document 2356 Filed in TXSB on 07/11/25 Page 9 of 12

Page 5 of 6 Sean Rogers #33279, WMCI, 7076 Road 55F, Torrington, WY 82240

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12. Is all or part of the claim entitled to priority woder 11 U.S.C. § 507(a)?	O No OX Yes, Check cost				Assess a respect to prizely
A daim may be partly priority and partly	O Carrente ser fil U.S.O. § 6	ipori collegillora (nodi XIXI) or (AXIXI)	vsing elistopy and oted s 8).	uzçon) under	
nonpriority. For example, in some categories, the travelents the amount estited to priority.	Up to \$3,350 parsocal, fee				
понен и рикау.	☐ Wages, calor bankruptcyp 11 U.S.C. § !	estion is filed or the d	up to \$15,150") ezmed v objer's business ends, w	within (B) days before the ficheser is easier.	
20000000000000000000000000000000000000	Taxes or per	alties owed to govern	mental ento. 11 U.S.C. (	( 607(a)(8).	
Tricks Old Bessel	Contributions	to an employee beni	stiplan. 11 U.S.C. § 507	( <b>3</b> ,5).	*
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The person completing this proof of claim must sign and date it.	Check the appropriate				
FREP 9011(b).	1 sm the creditor's attorney or authorized agent.				
# you the this claim electronically, FRSP	O Tan Be trustee,	or the deboor, or their	autrorized agent. Benie		
5005(a)(2) authorizes courts to establish local rules	Fam a guarantor, surety, endomer, or other codebtor, Bankruptcy Rule 3005.				
specifying what a signature is.	I anderstand that an authorized signature on this Proof of Civin serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the dettor credit for any payments received toward the debt.				
A person who files a fraudulent claim could be fined up to \$500,000, and correct the information in this Proof of Chim and have a reasonable belief that the imprisoned for up to 5.			rasonable belief that the info	xaaion is tree	
years, or both. 18 U.S.C. 55 157, 157, and	I declare under penalt	y of perjury that the f	oregoing is true and com	M.	
3571.	** ***** *** *** *********************				
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WHEREFORE, Petitioner respectfully moves this Honorable Court to take notice of the proof of claim as noted above.

This is an affidavit of the forgoing; Factual allegations, Damages, and legal claims said here in and asserted by Sean Rogers. Under penalty of perjury under united states laws that my statements on this form are true and correct (28 U.S.C.§ 1746 & 18 U.S.C.§1621)

Sean Rogers #33279 / In Propria Persona/ UNTRAINED LITIGANT

WMCI

7076 Road 55F

Page 1 of 1 Sean Rogers #33279, WMCI, 7076 Road 55F, Torrington WY. 82240

## UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION 515 RUSK AVE. 5<sup>th</sup> Floor HOUSTON, TX. 77002

In re: TEHUM CARE SERVICES, INC. et §

al Debtor

S Chapter 11

Vs.

Sean Rogers #33279
WMCI

7076 Road 55F Torrington, WY 82240 Date 6/19/25

Related Cases: CV-2023-56

Carbon County WY. No. CV-2024-88
U.S. WY. District No.24-cv-00214-ABJ

TX. Bankruptcy Case#23bk90086

#### **CERTIFICATE OF SERVICE**

COMES NOW the Defendant, Sean Rogers, In Propria Persona, hereby certify that the PROOF OF CLAIM was served on TEHUM CARE SERVICES, INC. and YESCARE the Debtor, by mailing a true and correct copy of the same on this 20th day of June 2025 in the united states mail, postage pre-paid, addressed as follows: "Trevor W. Carolan" BOWMAN AND BROOKE LLP, 5850 Granite Parkway, Suite 900, Plano, TX. 75024. And "Adam Masin" Two Alhambra Plaza, Suite 800, Coral Gables Fl. 33134.

This is an affidavit of the forgoing; Factual allegations, Damages, and legal claims said here in and asserted by Sean Rogers. Under penalty of perjury under united states laws that my statements on this form are true and correct (28 U.S.C.§ 1746 & 18 U.S.C.§1621)

Sean Rogers #33279 / In Propria Persona/ UNTRAINED LITIGANT

WMCI

7076 Road 55F

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United States Courts
Southern District of Texas
FILE D

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Nathan Ochsner, Clerk of Cour

FROM AN INMATE AT THE INYOMING THIS IS AN UNCENSORED LETTER

#### UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS

ın Ke:	Tenum Care Services, Inc.	
		Case No.: 23-90086

Debtor(s)

Chapter: 11

#### **NOTICE OF HEARING ON RELIEF FROM STAY**

On 7/14/25, a motion was filed seeking relief from the automatic stay of 11 U.S.C. 362. The court has set the preliminary hearing on the motion for:

DATE:

TIME:

LOCATION:

If you object to the lifting of the stay, no later than seven days before the hearing you must:

- 1. File with the Clerk and affidavit stating that:
  - a. You have conferred with the movant in a good faith effort to reach an agreement with the dates and times of the conferences,
  - b. The efforts were unsuccessful, and
  - c. A hearing is required.
- 2. File with the Clerk your written answer opposing the motion; include:
  - a. The particular grounds for the opposition under Federal Rules 8(b) and 11;
  - b. The identity of the interest in the property;
  - c. The provable value of the property and the equity after deduction of all encumbrances; and
  - d. Attach copies of your affidavit of conferences and the motion to your answer.
- 3. Serve a copy of the written answer on the movant.

Your written answer will be your request for hearing. No hearing will be held on the request of movant or on an answer received within seven days before the hearing.

**Date Issued: 7/14/25** 

Nathan Ochsner Clerk, U.S. Bankruptcy Court

*To the Movant:* A copy of this notice with a copy of your motion must be served within 24 hours of receipt from the Clerk. A proof of service form is attached.

#### Federal Rule of Civil Procedure 8(b)

**Defenses: Admissions and Denials.** (1) In responding to a pleading, a party must (A) state in short and plain terms its defenses to each claim asserted against it; and (B) admit or deny the allegations asserted against it by an opposing party. (2) A denial must fairly respond to the substance of the allegation. (3) A party that intends in good faith to deny all the allegations of a pleading – including the jurisditional grounds – may do so by general denial. A party that does not intend to deny all the allegations must either specifically deny designated allegations or generally deny all except those specifically admitted. (4) A party that intends in good faith to deny only part of an allegation must admit the part that is true and deny the rest.

# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF TEXAS

In Re:	Tehum Care Services, Inc.		Case No.: 23–90086		
	Debtor(s)				
	<u>N</u>		F OF SERVICE m Stay and Notice of Hea	ring	
On motion fo	n behalf of the movant or relief from stay with	I certify that I am notice of hearing	more than 18 years of age, ng.	and I served a copy of the	
(a)	on this date:				
(b)	by this method:				
(c)	on these entities:				
I certify	under penalty of perju	ry that this is true.			
Date Sig	ned		Signature		
			Counsel (typed)		

For Party