

page # 1 of 3PROVIDED TO AHALA
CORRECTIONAL INSTITUTIONON 9/11/25
FOR MAILING

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

United States Courts
Southern District of Texas
FILED

SEP 02 2025

TODD HERMANE THOMAS

Chapter 11

Plaintiff (Holder of Claim)

Nathan Ochsner, Clerk of Court

-VS-

CASE NO. 23-90086 (CML)

WORDAN, et al.,

Civil CASE NO.: 6:23-CV-01355-ACC-LHP(M.D.FL)

Defendants

IN RE: TEHUM CARE SERVICES, INC.,

Debtor

DECLARATION OF (TODD HERMANE THOMAS) - AND - PROOF OF CLAIM

Todd Hermane Thomas, declares under penalty of perjury
and Pursuant to 28 U.S.C. § 1746.

1.

I AM A Holder of a claim against the Debtor:
TEHUM CARE SERVICE, INC.

2.

I wish to be added on the list as a "Secured"
PI/WD claim holder and move my case forward
with a settlement from the PI/WD Trust as
soon as possible.



239008625090500000000001

3.

see: [Exhibit - "B"]

Although Exhibit -B' was drafted on May 16th 2025 it wasn't until May 28th 2025 that I received this document. I was not aware of my Rights as a Holder of a claim until I received this document. Had I been made aware of my Rights far sooner I would have surely asserted them. I was never provided with any materials related to "opting-out" of The Plan nor was I ever provided with any materials needed to file a Proof of Claim. May 28th 2025 was the absolute first time I've ever received any document from "Bowman and Brooke LLP" and these lawyers can not produce any document they have mailed me prior to this one because this institution keeps a legal mail log of all incoming legal documents. Also I did not know or have the mailing address to the Bankruptcy court until July 2nd 2025 when I received the Notice of Hearing which was held the same day I received the Notice making it impossible for me to attend it. See: [Exhibit "A"] which shows that the Notice of Hearing was received on 7/20/2025

4.

IF this document can not be accepted as Proof of Claim please provide me with any and all materials necessary in order for me to be listed as a "secured" PI/WD claim Holder and necessary to move my claim forward with receiving a settlement from the PI/WD Trust Plan. I'm seeking to simply resolve this matter as soon as possible. I wish to assert my rights and be forwarded with an opportunity to file a Proof of claim and be listed as a "secured" PI/WD claim Holder.

Under penalty of perjury under the laws of the United States of America I swear that the foregoing statements are true and correct.

July ~~11th~~ 2025.

Todd Germane Thomas
Todd Germane Thomas

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document was sent via U.S. mail on this 11th day of July 2025 to the following:

The United States Bankruptcy Court	Boman and Brooke LLP
Southern District of Texas, Houston Division	Mr. Trevor W. Carolan
Hon. Judge Christopher M. Lopez	5850 Granite Parkway Suite 900
515 Rusk Avenue, Houston Tx. 77002	Plano, Tx. 75024

Respectfully submitted

Todd J. Thomas

**STATE OF FLORIDA
DEPARTMENT OF CORRECTIONS
INCOMING LEGAL AND/OR PRIVILEGED MAIL LOG**

Exhibit A

Notice of Hearing Received

APALACHEE CI-EAST

JULY 2, 2025

Institution

Month/Year

DC Number	Inmate name	Date Mail Received by Inst.	Inmate	Date Mail Received By	Inmate's Signature	Officer's Initials
						yes
						yes
						yes
E32305	THOMAS SR., TODD	7/1/25	DAVID SILVERMAN, COUNTY JUDGE HARRY T. & HARRIETTE V. MOORE JUSTICE CENTER 2825 JUDGE FRAN JAMIESON WAY MELBOURNE, FL 32940	7/2	(2) Todd J. Thomas	yes
E32305	THOMAS, TODD	7/1/25	BOWMAN & BROOKE LLP ATTORNEYS AT LAW 5850 GRANITE PARKWAY SUITE 900 PLANO, TX 75024	7/2	Todd J. Thomas	yes

Bowman and Brooke LLP
Attorneys at Law

Two Alhambra Plaza, Suite 800
Coral Gables, FL 33134
Phone: 305-995-5600
Fax: 305-995-6090
bowmanandbrooke.com

Exhibit "B"

PROVIDED TO APALACHEE
CORRECTIONAL INSTITUTION
ON 7/11/25
FOR MAILING
Direct: +1.646.914.6790

Email: adam.masin@bowmanandbrooke.com

May 16, 2025

VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Todd Jermane Thomas
E32305
Apalachee Correctional Institution
West Unit
52 West Unit Drive
Sneads, FL 32460-4165

Re: *Thomas v. Jordan*, et al., #: 6:23-cv-01355-ACC-LHP (M.D. FL.)

Dear Mr. Thomas:

We write in regard to the above-captioned personal injury action asserted against former employees of Corizon Health, Inc. to inform you that this lawsuit must be stayed for as long as a "Channeling Injunction" remains in effect pursuant to the **now effective** First Modified Joint Chapter 11 Plan of Reorganization of the Tort Claimants' Committee, the Official Committee of Unsecured Creditors, and the Debtor (the "Plan") in the Chapter 11 Bankruptcy of Tehum Care Services, Inc. d/b/a Corizon Health (the "Debtor") (U.S. Bankruptcy Court for the Southern District of Texas Case 23-90086, hereinafter "SDTX Doc." at SDTX Doc. 2014). The Plan became effective on March 31, 2025. (See Doc. 2088).

[You had actual knowledge of the bankruptcy proceeding because a Suggestion of Bankruptcy was filed in the above-captioned case on April 22, 2024 (Doc. 55).

The Bankruptcy Court approved all notice procedures, including publication notice, and held in the Confirmation Order "that notice of the Confirmation Hearing and the opportunity for any party in interest to object to Confirmation have been adequate and appropriate as to all parties affected or to be affected by the Plan and the transactions contemplated thereby." (SDTX Doc. 2014, p. 6).

The Holder of a Claim wishing to opt out of the Plan, including the Consensual Claimant Release, was required to do so prior to the Voting Deadline. (Plan, Art. III.D; See also Confirmation Order, dated Mar. 3, 2025, at p. 4, (a.) (identifying voting

Todd Jermane Thomas
May 16, 2025
Page 2

deadline)). The Voting Deadline passed on February 21, 2025, at 5:00 p.m. Central Time. You did not opt out of the Plan. (See SDTX Doc. 1993, Exhibits A-5 and A-6).

Under the Plan, you are a holder of "PI/WD Claim," which is defined as:

any unsecured Claim against the Debtor that is attributable to, arises from, is based upon, relates to, or results from an alleged personal injury tort or wrongful death claim within the meaning of 28 U.S.C. § 157(b)(2)(B), including any PI/WD Claim against the Debtor [.]

(Plan at ¶142) (emphasis added).

Because you held an unsecured personal injury claim against the Debtor but did not opt out, you became a "Consenting PI/WD Claimant." (Plan, Art.I, ¶ 45). Consenting PI/WD Claimants have their claims "channeled" into a PI/WD Trust and are subject to a Channeling Injunction. (Plan, Art.I ¶ 45 (defining Channeling Injunction); Art. IV.D ("All Channeled PI/WD Trust Claims shall be subject to the Channeling Injunction.")).

The Channeling Injunction prohibits you from pursuing recovery outside of a PI/WD Trust against "any Released Party":

the sole recourse of any Holder of a Channeled PI/WD Trust Claim that is eligible for compensation under the PI/WD Trust Distribution Procedures on account of such Channeled PI/WD Trust Claim shall be to and against the PI/WD Trust pursuant to the PI/WD Trust Documents, and such **Holder shall have no right to assert such Channeled PI/WD Trust Claim or any Claim . . . against any Released Party...**

...on or after the Effective Date, and subject to the terms of Article IX.I.5, all Persons that have held or asserted, currently hold or assert, or that may in the future hold or assert, any Channeled Claim **shall be stayed, restrained, and enjoined** from taking any action for the purpose of directly, indirectly, or derivatively collecting, recovering, or receiving payment, satisfaction, or recovery **from any Released Party** with respect to any such Channeled Claim, other than from the Trusts...

(Plan, Art. IX.I.2; Art. III.F.6(a)(i) ("Except as provided in the Plan, Holders of Channeled PI/WD Claims shall be enjoined from prosecuting any outstanding or filing future Claims

Todd Jermane Thomas
May 16, 2025
Page 3

against the **Released Parties** in any forum whatsoever, including any state, federal, or non-U.S. court.”)).¹

The Plan defines a “Released Party” to include, amongst others, the Debtor and “each of their respective current and **former** officers, directors, managers, **employees**, contractors, agents, attorneys, and other professional advisors.” (Plan at ¶ 175) (emphasis added).

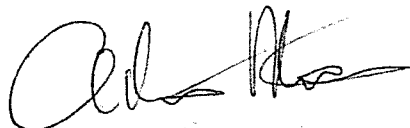
Accordingly, you are enjoined from pursuing your claims against former Corizon employees and the above-entitled action must be stayed as long as the Channeling Injunction remains in effect. Further, as of the Final Payment Date, you will be subject to a Consensual Claimant Release that releases any claim you may have against “each Released Party.” Any Released Parties remaining in the case will move to dismiss this action with prejudice at that time. Please refer to the Plan for additional details.

The Released Parties reserve their rights to take all necessary steps to protect their interests in the now effective Plan should Plaintiff seek to violate the Injunction barring interference with the Plan. We note that any Released Party may enforce its rights before the Bankruptcy Court, which expressly retained exclusive jurisdiction for such purposes and to decide any disputes related to the Plan.

Please let us know if you wish to discuss this matter.

Sincerely,

BOWMAN AND BROOKE LLP

By: 

Adam M. Masin
Trevor W. Carolan

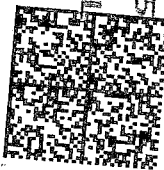
AMM/TWC

CC: Gregg A. Toomey, Steven M. Berman

¹ The PI/WD Trust will only actually pay “Allowed” claims under the Bankruptcy Plan, Art. I.A.7.

Todd DeCrombe Thomas Sr. PC #14132 FROM STATE
Apalachee Correctional Institution West Unit
22 West Unit Drive
Gneads FL 32460-4165

RECEIVED FROM STATE
CORRECTIONAL INSTITUTION
FILED
28 AUG 2025 AM 2 10
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United States Courts
Southern District of Texas
FILED

SEP 02 2025

Nathan Ochsenr, Clerk of Court

77002-250059

~~_____~~
~~_____~~
Southern District of Texas
Courtroom 401

1515 Riverside Avenue Houston, TX 77002