

ENTERED

September 11, 2025

Nathan Ochsner, Clerk

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

In re:**Chapter 11****TEHUM CARE SERVICES, INC.,****Case No. 23-90086 (CML)****Debtor.**

**STIPULATION REGARDING YESCARE'S MOTION FOR RECONSIDERATION TO
ENJOIN CLAIMANT MICHAEL ANDERSON FROM PROSECUTING CASES
AGAINST RELEASED PARTIES**

Plaintiff, Cassandra Oliver ("Oliver"), as personal representative of the Estate of Michael Anderson in the case 21-cv-03226 (U.S. District Court for the Western District of Missouri) (the "Anderson Lawsuit"), and CHS TX, Inc., and YesCare Corp. (collectively the "Parties"), by and through their respective counsel, **STIPULATE** and **AGREE** as follows:

On or about March 31, 2025, the 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) became effective.

Oliver received and returned an Opt-Out Release Form and did not opt out of the Consensual Claimant Release contained in the Plan. (*See* Doc. 1993, Ex. B at 34). Accordingly, Oliver is enjoined from continuing to prosecute the Anderson Lawsuit against "Released Parties" as long as the Plan's injunctions and release do not become void. The "Released Parties" include several current and putative defendants in the Anderson Lawsuit, including CHS TX, Inc, YesCare Corp., and former employees of the Debtor.



On May 16, 2025, CHS TX, Inc. d/b/a YesCare (“YesCare”) filed an Omnibus Motion to Enjoin Plaintiffs From Prosecuting Cases Against Released Parties. (Doc. 2160). This Motion included Plaintiff.

On August 7, 2025, the Court issued its “Decision and Order on YesCare’s Omnibus Motion to Enjoin Plaintiffs From Prosecuting Cases Against Released Parties” (Doc. 2374). The “Michael Anderson” case is listed on Exhibit B of the Order of cases not enjoined.

On August 20, 2025, however, YesCare filed a Motion for Reconsideration of the Court’s August 7, 2025, “Decision and Order on YesCare’s Omnibus Motion to Enjoin Plaintiffs From Prosecuting Cases Against Released Parties” specifically as to the “Michael Anderson” case listed on Exhibit B of the Order. The basis of the Motion was that the fact that Oliver, did in fact receive and return an Opt-Out Release Form and did not opt out. (*See* Doc. 1993, Ex. B at 34).

Wherefore, in furtherance of the Plan, the Parties stipulate and agree that Plaintiff is restrained and enjoined from taking any action to prosecute any causes of action for the purpose of directly, indirectly, or derivatively collecting, recovering, or receiving payment, satisfaction, or recovery from any Released Party based on released Causes of Action (as such terms are defined in the Plan). Plaintiff retains any and all rights under the Plan that are otherwise available.

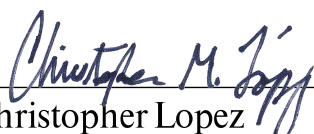
By: /s/ Connor G. Curran
Connor G. Curran
ZDP LAW, LLC
4330 Belleview, Suite 300A
Kansas City, MO 64111
(P) 816.226.7299
(F) 816.343.9321
ccurran@zdpplaw.com

Attorney for Plaintiff

By: /s/ Trevor W. Carolan
Trevor W. Carolan
State Bar No.: 24128898
Southern District Federal No. 3794850
Adam M. Masin
Admitted Pro Hac Vice
BOWMAN AND BROOKE LLP
5850 Granite Parkway, Suite 900
Plano, TX 75024
(972) 616-1700 (Telephone)
Trevor.carolan@bowmanandbrooke.com
Adam.masin@bowmanandbrooke.com

Attorneys for Defendants

Signed: September 11, 2025



Christopher Lopez
United States Bankruptcy Judge