

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

In re:

TEHUM CARE SERVICES, INC.,

Debtor.

Chapter 11

Case No. 23-90086 (CML)

JOINT APPELLEE ADDITIONAL DESIGNATION OF RECORD

Appellee, Hammel J. Clark-El, joined by Clarence Dean, as personal representative of the estate of Jesse Dean, Stephen J. Howe, Lisa Lee Alice Brown, Jamonte Jamar Fletcher, Andrew J. Dicks, Sr., Chelsea Gilliam, Chloe Grey and Kennedy Holland (together, the “Appellees”), by and through their undersigned counsel, hereby submit this Additional Designation of the Record on Appeal pursuant to Rule 8009(a)(2) of the Federal Rules of Bankruptcy Procedure.

In addition to the items designated in *Appellant YesCare’s Designation of Record and Statement of Issues on Appeal* filed by Appellant CHS TX, d/b/a YesCare (“YesCare”), the Appellees specifically designate the following docket entries, which include all exhibits, addenda, or other attachments thereto, and all documents incorporated by reference therein:

Item No.	Doc No. (Case 23-90086)	Document
1	481	Schedules of Assets and Liabilities
2	676	Amended Schedule E/F
3	1165	Objection and Reservation of Rights of the Second Amended Disclosure Statement Regarding Debtor and Official Committee of Unsecured Creditors’ Second Amended Joint Chapter 11 Plan
4	1741	Joint Motion for Approval of (I) 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
5	1815	Notice of Filing of Solicitation Versions of the Joint Chapter 11 Plan of the Tort Claimants' Committee, Official Committee of Unsecured Creditors, and Debtor and Related Disclosure Statement
6	1863	Certification of Publication re: 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 in Prison Legal News
7	1867	Certificate of Service (Supplemental) re Solicitation Materials
8	1868	Certificate of Service (Supplemental) re Solicitation Materials
9	1925	Certificate of Service (Supplemental) re: Solicitation Materials Served on or Before January 6, 2025
10	1928	Certificate of Service (Supplemental) re: Confirmation Hearing Notice
11	1958	Certificate of Service (Supplemental) re: Solicitation Materials Served on or Before January 29, 2025
12	1960	Certificate of Service (Supplemental) re: Solicitation Materials Served on January 10, 2025
13	1988	Certificate of Service (Supplemental) re: Solicitation Materials Served on February 7, 2025
14	2106	Opposition of YesCare Corp., CHS TX., Inc. and Corizon Health of New Mexico to the Motion by Vincent Ward (Personal Representative of the Wrongful Death Estate of Leon Casiquito) for Determination that They are Not Released in Their Obligations to Ward by the Confirmation Order and Plan
15	2222	Objection of Andrew Lyles to YesCare's Omnibus Motion to Enjoin Plaintiffs from Prosecuting Cases Against Released Parties
16	2227	Lisa Alice Brown's Notice of Appearance and Request for Notice Filed
17	2228	Stipulation and Agreed Order Extending Lisa Lee Alice Brown's Objection Deadline to YesCare's

		Omnibus Motion to Enjoin Plaintiffs from Prosecuting Cases Against Released Parties
18	2309	Witness and Exhibit List (Filed By Lisa Lee Alice Brown)
19	2310	Witness and Exhibit List (Filed By Andrew Lyles)
20	2334	Transcript of 7/2/2025 Hearing
21	2335	Transcript of 7/2/2025 Hearing
22		Suggestion of Bankruptcy and Notice of Automatic Stay filed in <i>Andrew Joseph Dicks, Sr. v. YesCare Medical Company, et al.</i> , Case No. 1:23-CV-02464-JKB (D. Md). Attached hereto as <u>Exhibit A</u>
23		Suggestion of Bankruptcy and Notice of Automatic Stay filed in <i>Jamar Jamonte Fletcher v. Yes Care Corp., et al.</i> , Civ. Act. No. PX-23-1570 (D. Md.) Attached hereto as <u>Exhibit B</u>

[SIGNATURES ON FOLLOWING PAGE]

Dated: September 18, 2025

Respectfully submitted,

/s/ Matthew L. Warren

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CERTIFICATE OF SERVICE

I do hereby certify that on the 18th day of September, 2025, a true and correct copy of the foregoing was electronically filed with the Clerk of Court and served using the CM/ECF system.

/s/ Matthew L. Warren
Matthew L. Warren

EXHIBIT A

**Suggestion of Bankruptcy and Notice of Automatic Stay
filed in
Andrew Joseph Dicks, Sr. v. YesCare Medical Company, et al.,
Case No. 1:23-CV-02464-JKB (D. Md)**

[see attached]

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

ANDREW JOSEPH DICKS, SR.

Plaintiff,

v.

Case No. 1:23-CV-02464-JKB

YESCARE MEDICAL COMPANY,. et al.

Defendants.

SUGGESTION OF BANKRUPTCY AND NOTICE OF AUTOMATIC STAY

TEHUM CARE SERVICES, INC. d/b/a CORIZON HEALTH INC. (hereinafter referred to as “TCS” or the “Debtor”), named Defendant herein, files this *Suggestion of Bankruptcy and Notice of Automatic Stay* and would respectfully show as follows:

1.On February 13, 2023 (the “Petition Date”), TCS filed a voluntary petition pursuant to chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”). The case is pending in the United States Bankruptcy Court for the Southern District of Texas, Houston Division, under Case No. 23-90086 (CML) (the “Chapter 11 Case”).

2.As a result of the commencement of the Chapter 11 Case, section 362 of the Bankruptcy Code operates as a stay, applicable to all entities, of (i) commencement or continuation of a judicial, administrative or other action or proceeding against the Debtor that was or could have been commenced before the commencement of the Chapter 11 Case, or to recover a claim against the Debtor that arose before the commencement of the Chapter 11 Case; (ii) the enforcement, against the Debtor or against the property of their bankruptcy estates, of a judgment obtained before the commencement of the Chapter 11 Case; (iii) any act to obtain possession of property of the estate or of property from the estates or to exercise control over

property of the Debtor's estate; and (iv) any act to create, perfect, or enforce a lien against property of the Debtors' estate.

3.The stay set forth in 11 U.S.C. § 362(a) became effective automatically upon the commencement of the Chapter 11 Case. If any party violates the stay, the Debtor may seek to have such actions deemed void, move for sanctions in the Bankruptcy Court and recover actual damages, including costs and attorneys' fees, arising from the violation of the stay.

**MARKS, O'NEILL, O'BRIEN,
DOHERTY & KELLY, P.C.**

By: /s/ Megan T. Mantzavinos
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 7th Day of February 2025, a copy of the foregoing document was electronically transmitted to this court and mailed first class, postage pre-paid to:

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Megan T. Mantzavinos
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Corizon Health, Inc., et al.*

EXHIBIT B

**Suggestion of Bankruptcy and Notice of Automatic Stay
filed in**

***Jamar Jamonte Fletcher v. Yes Care Corp., et al.,*
Civ. Act. No. PX-23-1570 (D. Md.)**

[see attached]

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

JAMAR JAMONTE FLETCHER,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. PX-23-1570
	)	
YES CARE, CORP., <i>et al.</i>	)	
	)	
Defendants.	)	

SUGGESTION OF BANKRUPTCY AND NOTICE OF AUTOMATIC STAY

Tehum Care Services, Inc. d/b/a Corizon Health, Inc. (“TCS” or the “Debtor”), one of the named defendants herein, files this *Suggestion of Bankruptcy and Notice of Automatic Stay* and would respectfully show as follows:

1. On February 13, 2023 (the “Petition Date”), TCS filed a voluntary petition pursuant to chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”). The case is pending in the United States Bankruptcy Court for the Southern District of Texas, Houston Division, under Case No. 23-90086 (CML) (the “Chapter 11 Case”).

2. As a result of the commencement of the Chapter 11 Case, section 362 of the Bankruptcy Code operates as a stay, applicable to all entities, of (i) commencement or continuation of a judicial, administrative or other action or proceeding against the Debtor that was or could have been commenced before the commencement of the Chapter 11 Case, or to recover a claim against the Debtor that arose before the commencement of the Chapter 11 Case; (ii) the enforcement, against the Debtor or against the property of their bankruptcy estates, of a judgment obtained before the commencement of the Chapter 11 Case; (iii) any act to obtain possession of property of the estate or of property from the estates or to exercise control over

property of the Debtor's estate; and (iv) any act to create, perfect, or enforce a lien against property of the Debtors' estate.

3. The stay set forth in 11 U.S.C. § 362(a) became effective automatically upon the commencement of the Chapter 11 Case. If any party violates the stay, the Debtor may seek to have such actions deemed void, move for sanctions in the Bankruptcy Court and recover actual damages, including costs and attorneys' fees, arising from the violation of the stay.

Dated: November 22, 2023

Respectfully submitted,

**MARKS, O'NEILL, O'BRIEN, DOHERTY,
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CERTIFICATE OF SERVICE

I hereby certify that on November 22, 2023, the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the Plaintiff:

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/s/ Megan T. Mantzavinos
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