

**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.

**YESCARE’S RESPONSE TO DEON GLENN’S
“MOTION FOR RELIEF FROM FINAL ORDER CONFIRMING PLAN”**

YesCare files this limited Response to Deon Glenn’s “Motion for Relief from Final Order Confirming Plan.” (Doc. 2427).

Despite the title of his Motion, Glenn does not seek relief from the Court’s Order Confirming the Plan.¹ Rather, he takes issue with his classification as an “Exhibit C” claimant in the Court’s Order on YesCare’s Omnibus Motion to Enjoin Plaintiffs from Prosecuting Cases Against Released Parties. (Doc. 2374). He argues that “there is no proof of service or any other evidence of service” of the Opt-Out Release Form or Notice of Non-Voting Status. As the Motion makes clear, Mr. Glenn filed an objection to YesCare’s Omnibus Motion, arguing lack of notice (Doc. 2210), and YesCare filed a Response (Doc. 2249). Following the Court’s ruling that it would be holding an additional hearing as to the Exhibit C claimants, Mr. Glenn filed the instant Motion

¹ The Motion also incorrectly refers to YesCare as “the Debtor” throughout. YesCare is not the Debtor, has never been the Debtor, and has no authority to act on behalf of the Debtor in any capacity whatsoever.



again arguing lack of notice. Mr. Glenn's counsel, Daniel Randazzo, appeared at the September 22, 2025, hearing on the Exhibit C claimants and presented arguments to the Court, again related to the supposed lack of notice. Contrary to the arguments made regarding notice, there is proof of service of Deon Glenn being served the Opt-Out Release Form, Notice of Non-Voting Status, Confirmation Hearing Notice, and Return Envelope, appearing on Exhibit H of the Plan Certificate of Service. (Doc. 1852 at 50).

It is unclear why another hearing is necessary on this issue on September 24, 2025. In any event, YesCare again incorporates its previous arguments already submitted on this issue in its Omnibus Motion (Doc. 2160), its Reply to Deon Glenn's initial objections (Doc. 2249), and the arguments made at the September 22, 2025 Hearing on the Exhibit C claimants.

Respectfully submitted,

By: /s/ Trevor W. Carolan

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CERTIFICATE OF SERVICE

I do hereby certify that on the 23rd 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. In addition, a true and correct copy has been electronically mailed to the following:

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/s/ Trevor W. Carolan
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