

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED
SEP 23 2025
Nathan Ochsner, Clerk of Court

IN RE:

Chapter 11

TEHUM CARE SERVICES, INC.,

Case No. 23-90086 (CML)

Debtor.

MEMORANDUM IN SUPPORT OF ARDRA YOUNG'S
PROPOSED SUPPLEMENT TO HIS RESPONSE

Introduction

This proposed supplement is being interposed to set forth new facts received after the filing of the initial response to CHS TX, Inc.'s Supplementary Memorandum which directly affect the controversy and the relief that he seeks.

I. The basis of this proposed supplement

Ardra Young is one of the claimants identified in "Exhibit C" of this Court's August 7, 2025 "Decision and Order on YesCare's Omnibus Motion to Enjoin Plaintiffs from Prosecuting Cases Against Released Parties." CHS TX, Inc. asserts that all Exhibit C claimants should be enjoined from prosecuting their cases against the released parties because they "were served an Opt-Out Release Form, Notice of Non-Voting Status, and the Confirmation Hearing Notice." Supplementary Memorandum, at pp. 2, 21.



On September 11, 2025, Ardra Young filed his response to the Supplementary Memorandum, asserting that he has not been served with an Opt-Out Release Form, Notice of Non-Voting Status, or Confirmation Hearing Notice and that the Supplementary Memorandum is the only item that he has ever received from Bowman and Brooke, LLP, counsel representing CHS TX, Inc. See Ardra Young's Response to CHS TX, Inc.'s Supplementary Memorandum of Law, pp. 2-3.

II. CHS TX, Inc.'s purported Notice is not reflected
in the prison's incoming legal mail log

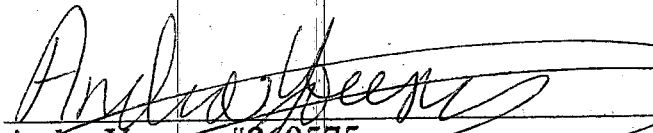
Through January 2025, Ardra Young received special handling of his incoming legal mail and signed a log indicating receipt of such. Pursuant to his request, the prison's Mailroom Supervisor conducted a review of the incoming legal mail log from March 2023 through January 2025 to ascertain whether he received any mail from counsel for CHS TX, Inc. On September 15, 2025, Ardra Young received a response indicating that no mail was received from Bowman and Brooke, LLP. See attached letter.

If the Proofs of Service for the Opt-Out Release Form, Notice of Non-Voting Status, and the Confirmation Hearing Notice indicate that they were mailed between March 2023 and January 2025, such mailing would have been memorialized in the prison's incoming legal mail log. That they were not is dispositive of the fact that Ardra Young was not provided notice. But even if they were purportedly mailed post-January 2025, it is still a fact that Ardra Young has never received the Opt-Out Release Form, Notice of Non-Voting Status, or the Confirmation Hearing Notice.

Relief Requested

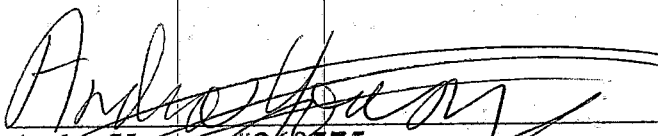
WHEREFORE, Ardra Young prays that this Honorable Court will permit him to supplement his initial response and FIND AND ADJUDGE that he has not been served with the Opt-Out Release Form, Notice of Non-Voting Status, or the Confirmation Hearing Notice.

Respectfully submitted,


Ardra Young, #260575
Richard A. Handlon Correctional Facility
1728 Bluewater Highway
Ionia, Michigan 48846

Proof of Service

I, Ardra Young, do hereby certify that on even date with filing of same in this Court, I sent Bowman and Brooke, LLP, counsel for CHS TX, Inc., a copy of the instant Motion to Supplement and Memorandum in Support via pre-franked first-class mail addressed to the address of record.


Ardra Young, #260575
Richard A. Handlon Correctional Facility
1728 Bluewater Highway
Ionia, Michigan 48846

ARDRA YOUNG

#260575

Richard A. Handlon Correctional Facility
1728 Bluewater Highway
Ionia, Michigan 48846

September 7, 2025

TO: Mailroom Supervisor
RE: Young, #260575, C-58

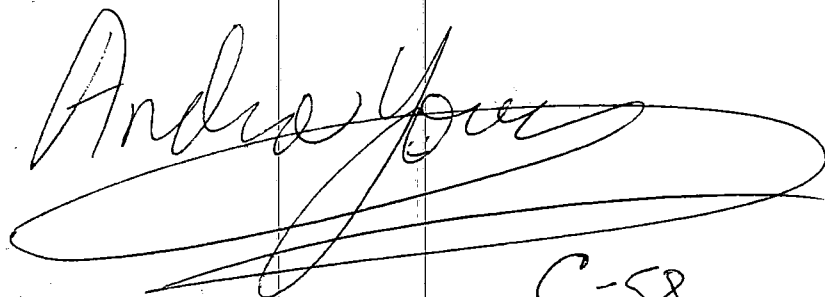
Thank you for your prompt response to my recent query.

I am sorry for bugging you again so soon, but I need one more thing if you can help me. I need to know if the incoming legal mail log between March 2023 and January 2025 *during the periods when I received special handling* indicates that I received any mail from Bowman and Brooke, LLP, a firm out of Plano, Texas. I know that I did not, but I have to prove it to the Bankruptcy Court in Houston, Texas for purposes of my civil action against Corizon Health, Inc.

For the sake of ease and because this is purely a binary matter, you could simply indicate "Yes" or "No" on this letter with your signature or initials and that will be sufficient.

I appreciate whatever assistance you can offer in this matter.

Regards,



C-58

Received on 9/15/2025
A.P.S.

No Legal mail
during that time
period

P. Donahue / GOA
mtu mailroom
9/8/25