

**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 TO ENJOIN PLAINTIFF
JENNIFER POWER AS ADMINISTRATOR OF THE ESTATE OF MONNIE
WASHBURN FROM PROSECUTING CASES AGAINST RELEASED PARTIES**

Plaintiff, Jennifer Power (“Power”), the plaintiff and administrator of the estate of decedent Monnie Washburn in *Power v. Arizona, State of Arizona et al.*, Case No. CV2018-008861 (Ariz. Sup. Ct., Maricopa County), 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.

Through her attorney, Power was timely served with a Proof of Claim form, Notice of Deadlines for Filing Proofs of Claim, the Plan, the Disclosure Statement, and the Solicitation Package which included an Opt-Out Release form. (Doc. 609 at 4, 7, 86; Doc. 1852 at 27, 99, 105, 179). A Suggestion of Bankruptcy was also filed in the Action on February 14, 2023. (*See* Case No. CV2018-008861 at ECF entry 2/14/2023). Power filed two proofs of claim, (Claim Nos. 535 and 975), did not opt-out of the Consensual Claimant Release contained in the Plan, and voted in



favor of the Plan. (Doc. 1993 at 20). Accordingly, Power is enjoined from prosecuting actions against “Released Parties” as long as the Plan’s injunctions and release do not become void.

On September 30, 2025, CHS TX, Inc. d/b/a YesCare (“YesCare”) filed a Motion to Enjoin Power from Prosecuting Cases Against Released Parties. (Doc. 2487).

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/ Anne E. Findling

Anne E. Findling

Lauren Channel

Robbins Curtin Millea & Showalter, LLC

301 E. Bethany Home Rd., Suite B100

Phoenix AZ 85012

(602) 285-0100

fax (602) 265-0267

anne@rcmslaw.com

Lauren@rcmslaw.com

Attorneys 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