

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

In re:

TEHUM CARE SERVICES, INC.,¹

Debtor.

Chapter 11

Case No. 23-90086 (CML)

**RESPONSE AND OBJECTION BY THE PI/WD TRUSTEE TO THE MOTION BY
YESCARE TO ENJOIN PLAINTIFF JENNIFER POWER AS ADMINISTRATOR OF
THE ESTATE OF MONNIE WASHBURN FROM PROSECUTING CLAIMS AGAINST
RELEASED PARTIES**

Michael Zimmerman (the “PI/WD Trustee”), the trustee for the Tehum Personal Injury Settlement Trust (the “PI/WD Trust”), by and through his undersigned counsel, hereby submits this Response and Objection (“Objection”) to the Motion by YesCare to Enjoin Plaintiff Jennifer Power (“Ms. Power”) as Administrator of the Estate of Monnie Washburn from Prosecuting Claims against Released Parties [ECF No. 2487] (the “Motion”).

PRELIMINARY STATEMENT

CHS TX, Inc. d/b/a YesCare (“YesCare” or “Movant”) seeks an Order from the Court enjoining Jennifer Power, the plaintiff and administrator of the estate of Monnie Washburn, from continuing to prosecute her claims against defendants Corizon Health, Inc., Corizon, Inc., and Corizon LLC (collectively the “Corizon Defendants”) in *Power v. Arizona, State of Arizona et al.*, Case No. CV2018-008861 (Ariz. Sup. Ct., Maricopa County) (the “Action”), and the related federal appellate action *Power v. Arizona, State of Arizona et al.*, Case No. 21-16436 (9th Cir.) (the “Appeal”).

¹ The last four digits of the Debtor’s federal tax identification number is 8853. The Debtor’s service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.



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YesCare is not a named defendant and has no authority or standing to file the Motion on behalf of the Corizon Defendants. Moreover, notwithstanding the channeling injunction, the PI/WD Trustee has the ability to pursue insurance recovery on behalf of the PI/WD Trust. The Motion does not even allege that Ms. Power violated the channeling injunction, and Ms. Power has not taken any such violative actions. The Motion should be denied.

RELEVANT BACKGROUND

1. On or about November 8, 1982, Corizon, Inc.² filed its Articles of Incorporation in the State of Missouri.

2. On or about December 31, 2013, Corizon, Inc. converted from a corporation to a limited liability company, and began operating under the name Corizon, LLC³. *See* Exhibit A.

3. On June 14, 2018, Jennifer Power, individually and as administrator of the estate of Monnie Washburn, brought a wrongful death Complaint against Corizon Health, Inc., Corizon, Inc., and Corizon LLC, and others, captioned *Power v. Arizona, State of Arizona et al.*, CV2018-008861 (Ariz. Sup. Ct., Maricopa County).

4. On March 7, 2019, the Action was removed to the United States District Court for the District of Arizona, under Case No. 2:19-cv-01546-DLR (D. Ariz.) (the “District Court Action”). *See* Case No. 2:19-cv-01546-DLR, ECF No. 1.

5. On August 13, 2021, the District Court dismissed Ms. Power’s claims under 42 U.S.C. § 1983 (the “1983 Claims”) against the Corizon Defendants and remanded the remaining

² Corizon, Inc. was originally named Correctional Medical Systems, Inc. In 1986, Correctional Medical Systems, Inc. changed its name to ARA Health Services, Inc. In 1994, ARA Health Services, Inc. changed its name to Correctional Medical Services, Inc. In 2011, Correctional Medical Services, Inc. changed its name to Corizon, Inc.

³ The Certificate of Conversion from a Corporation to a Limited Liability Company served as the Articles of Organization for Corizon, LLC.

claims to the Superior Court of Arizona, Maricopa County, Case No. CV2018-008861. See Case No. 2:19-cv-01546-DLR, ECF No. 201.

6. On or about August 26, 2021, Ms. Power appealed the dismissal of the 1983 Claims against the Corizon Defendants and others to the Ninth Circuit.

7. On or about May 5, 2022, Corizon, LLC merged with and into Corizon Health, Inc. See Exhibit B.

8. On or about June 1, 2022, Corizon Health, Inc. changed its name to Tehum Care Services, Inc. See Exhibit C.

9. On February 13, 2023 (the “Petition Date”), Tehum Care Services, Inc. f/k/a Corizon Health, Inc. (the “Debtor”) filed its voluntary petition for relief under Chapter 11 of the Bankruptcy Code (the “Bankruptcy Case”).

10. On February 14, 2023, the Corizon Defendants filed a Suggestion of Bankruptcy and Notice of Automatic Stay in the Action. See Case No. CV2018-008861 at ECF entry 2/14/2023.

11. Following the filing of the Suggestion of Bankruptcy, the court stayed the Action as to the Corizon Defendants, and the Action currently remains stayed “pending the resolution of plaintiffs claim against the Corizon Defendants through the claim distribution procedures established in the Tehum Care Services bankruptcy.” See Case No. CV2018-008861 at ECF entry 8/28/2025.

12. Since filing the Suggestion of Bankruptcy, Ms. Power has not taken any steps to prosecute the Action. See Action Docket attached hereto as Exhibit D.

13. On July 10, 2023, as a result of the Bankruptcy stay, the Ninth Circuit Clerk closed the Appeal as to the Corizon Defendants, and the matter remained stayed in the Arizona District

Court. *See* Motion, Exhibit D.

14. On February 6, 2025, Ms. Power orally requested to have the District Court Action dismissed as to the Corizon Defendants, which request was granted by the District Court as reflected in the District Court’s docket Minute Entry. *See* 2:19-cv-01546-DLR at ECF Dkt. No. 227 attached hereto as Exhibit E.

15. On March 3, 2025, the Bankruptcy Court confirmed the *First Modified Joint Chapter 11 Plan of Reorganization of the Tort Claimants’ Committee, Official Committee of Unsecured Creditors, and Debtor* (the “Plan” or the “Confirmation Order”) [ECF No. 2014, Ex. B].

16. On March 31, 2025, the Plan became effective [ECF No. 2088].

17. Ms. Power returned a ballot voting in favor of the Plan, as defined hereinafter, but did not submit an Opt-Out Release Form to opt-out of the Plan [ECF No. 1993 at 20].

18. Accordingly, Ms. Power holds a Channeled PI/WD Claim that is being administered in the PI/WD Trust [ECF No. 2014, Exhibit B, Article I.A.23, pg. 3 of 61].

19. Ms. Power has completed and submitted the Trust Claim Submission to the PI/WD Trust, and her claim is currently being administered by the PI/WD Trustee [ECF No. 1815-2, Exhibit B, Article VI.B, pgs. 11-12].

20. The Plan defines Post-Effective Date Debtor as “the Debtor, the GUC Trust, or any successor thereto after the Effective Date . . .” [ECF No. 2014, Exhibit B, Article I.A.162, pg. 13 of 61].

21. The Plan indicates that the GUC Trustee is the “sole manager, director, and officer of the Post-Effective Date Debtor and shall succeed to the powers of the Debtor’s managers, directors, and officers” and “[f]rom and after the Effective Date, the GUC Trustee shall be the sole

representative of, and shall act for, the Post-Effective Date Debtor [*Id.* at Article IV.F.1.e, pg. 34 of 61].

22. The Plan empowers the PI/WD Trustee to “initiate, prosecute, defend, settle, maintain, administer, preserve, pursue, and resolve all legal actions and other proceedings related to any asset, liability, or responsibility of the PI/WD Trust, including the PI/WD Insurance Actions” [ECF No. 2014, Exhibit B, Article IV.F.2.n, pg. 39 of 61].

23. The Plan also provides that PI/WD Insurance Action Recoveries are assets of the PI/WD Trust [ECF No. 2014, Exhibit B, Article I.A.147, 148, and 153, pgs. 12-13 of 61].

24. The Plan indicates that, “[t]he Committees, the Debtor, and the Settlement Parties . . . reached a global resolution of all issues among them in the Chapter 11 Case” (the “Global Settlement”) [ECF No. 2014, Ex. B, Article IV.B, Page 28 of 61].

25. The Global Settlement requires the Settlement Parties to remit the sum of \$50,000,000.00 (the “Settlement Amount”) in exchange for a release of the Released Parties. *See Id.* at Article I.A.175, Page 14 of 61 and Article IV.B.1, Page 29 of 61].

26. The Plan requires payment of the Settlement Amount through monthly installments with the final monthly installment (the “Final Settlement Payment”) due and owing no later than thirty (30) months after the Effective Date [*See Id.* at Article IV.B.1, Page 29 of 61].

27. Since the releases do not become immediately effective, the Plan contains a Channeling Injunction that enjoins Consenting Claimants from pursuing Channeled Claims while the Settling Parties remit the Settlement Payment to the Trusts [*See Id.* at Article I.A.25, Page 3 of 61, Article IV.F.1.c, Page 34 of 61, Article IV.F.2.c, Page 37 of 61, Article IX.I.2, Page 51 of 61].

28. To the extent the Final Settlement Payment is received by the Trusts, the releases will become effective and each Holder of a Channeled Claim will be limited to recovery from the Trusts. [See Id. at Article IX.I.2, Page 51 of 61].

29. To the extent the Settlement Parties fail to timely remit and cure a default in any Settlement Payment due under the Plan, “all Plan injunctions, stays, or releases provided in favor of the Released Parties that are in effect under the Plan shall be deemed terminated and void” and each Holder of a Channeled Claim will have the ability to proceed forward with litigation against the Released Parties [See Id. at Article IV.B.2, Page 29 of 61].

ARGUMENT

I. INSURANCE COMPANIES ARE NOT RELEASED PARTIES AND THE PLAN AUTHORIZES THE PI/WD TRUSTEE TO PURSUE RECOVERY OF INSURANCE PROCEEDS FROM THE INSURANCE COMPANIES

The relief requested by the Movant in the Motion is limited to Ms. Power’s ability to prosecute her claims against the Corizon Defendants. The *Stipulation Regarding the Motion* that was entered into by YesCare and Ms. Power and filed with this Court provides that Ms. Power 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” [ECF No. 2514, pg. 2 of 2]. However, the PI/WD Trustee must ensure that the PI/WD Trust’s ability to recover insurance assets related to Ms. Power’s channeled claim, and to pay distributions to Ms. Power from the PI/WD Trust are not unduly impaired. The PI/WD Trust’s rights with respect to the PI/WD Insurance Actions includes the right to receive proceeds from a PI/WD Insurance Policy [ECF No. 2014, Exhibit B, Article I.A.146, pg. 12 of 61].

The channeling injunction does not impair the PI/WD Trust’s ability to pursue insurance recovery for any Channeled PI/WD Claim. YesCare cannot impair the PI/WD Trustee’s ability to recover insurance assets provided in the Plan.

II. YESCARE IS NOT THE PROPER PARTY TO BE SEEKING THE REQUESTED RELIEF

YesCare filed the instant Motion requesting the entry of an Order enjoining Ms. Power from continuing to prosecute claims against defendants Corizon Health, Inc., Corizon, Inc., and Corizon LLC. YesCare is not one of the Corizon Defendants and YesCare has failed to explain how it is authorized to be taking action on behalf of the Corizon Defendants.

Through mergers and changes in corporate structure, Corizon, Inc. became Corizon, LLC, Corizon, LLC became Corizon Health, Inc., and Corizon Health, Inc. became Tehum Care Services, Inc., the Debtor. As a result of the mergers and changes in corporate structure, Matthew Dundon, the GUC Trustee, is the party with the ability to pursue the requested relief on behalf of the Corizon Defendants. Matthew Dundon, the GUC Trustee, is the proper party with the ability to pursue requested relief on behalf of the Debtor. Upon information and belief, Matthew Dundon did not authorize the filing of the Motion.

The Motion fails to explain YesCare's interest in the Corizon Defendants, or how YesCare is otherwise authorized to pursue relief on behalf of the Corizon Defendants. Based upon the foregoing, YesCare lacks standing to pursue the relief on behalf of the Corizon Defendants and requests that the Court deny the requested relief on this basis.

III. THE PLAN CONTAINS A CHANNELING INJUNCTION AND YESCARE HAS NOT PROVIDED A BASIS FOR THE RELIEF REQUESTED IN THE MOTION

YesCare filed the instant Motion requesting the entry of an Order enjoining Ms. Power from continuing to prosecute claims against defendants Corizon Health, Inc., Corizon, Inc., and Corizon LLC. However, the Plan already contains a channeling injunction that enjoins Ms. Power from prosecuting her claims against Corizon Defendants. The Movant failed to provide any explanation as to why the channeling injunction contained in the Plan is insufficient to enjoin the Action and Appeal, or what actions Ms. Power has taken to further prosecute the Action and Appeal. In fact, the Appeal closed as to the Corizon Defendants on July 10, 2023, and on February 6, 2025, Ms. Power dismissed the claims against the Corizon Defendants that were the subject of the Appeal in the District Court Action. *See* Exhibit D to the Motion and Exhibit E attached hereto. No

further action has been taken to prosecute the Action⁴. See Exhibit D. Based upon the foregoing, YesCare has not set forth a basis for the requested relief, and therefore the PI/WD Trustee requests that the Motion be denied.

CONCLUSION

YesCare is not the proper party to be pursuing this Motion and has otherwise failed to set forth a basis for the requested relief in the Motion. The PI/WD Trustee has a right to recover insurance. Accordingly, the Court should deny the Motion.

Dated: October 20, 2025
Phoenix, AZ

Respectfully submitted,

NACH, RODGERS, HILKERT & SANTILLI

/s/ Paul M. Hilkert

Paul M. Hilkert (SDTX Bar No. 3912203)
Stuart B. Rodgers (SDTX Bar No. 3917206)
1220 E. Osborn Rd., Suite 101
Phoenix, AZ 85014
Telephone: (602) 258-6000
paul.hilkert@nrhslaw.com
stuart.rodgers@nrhslaw.com

COUNSEL FOR THE TEHUM PERSONAL
INJURY SETTLEMENT TRUST

⁴ Pursuant to the Action Docket, on August 28, 2025, the Maricopa County Superior Court entered an order that stated “[t]his matter will remain stayed as to the Corizon Defendants only pending the resolution of [Ms. Power’s] claim against the Corizon Defendants through the claim distribution procedures established in the Tehum Care Services bankruptcy”.

CERTIFICATE OF SERVICE

I certify that on October 20, 2025, I caused a true and correct copy of the foregoing document to be served by the Court's CM/ECF notification system, which will send notice of electronic filing to all counsel of record.

/s/ Becca Casteel

Exhibit “A”

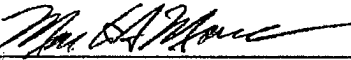
File Number:
LC1366450
Date Filed: 12/31/2013
Jason Kander
Secretary of State

STATE OF MISSOURI
CERTIFICATE OF CONVERSION
FROM A CORPORATION TO A
LIMITED LIABILITY COMPANY PURSUANT TO
SECTION 351.409 OF THE GENERAL AND
BUSINESS CORPORATION LAW OF MISSOURI

- 1.) The jurisdiction where the Corporation first formed is Missouri.
- 3.) The date the corporation first formed is November 8, 1982.
- 4.) The name of the Corporation as originally incorporated is CORRECTIONAL MEDICAL SYSTEMS, INC.
- 5.) The name of the Limited Liability Company to which the corporation shall be converted is Corizon, LLC.
- 6.) The jurisdiction of the newly converted Limited Liability Company is Missouri.
- 7.) Corizon, Inc. agrees that it may be served with process in the state of Missouri in any action, suit or proceeding for enforcement of any obligation of the corporation arising while it was a Missouri corporation and that it irrevocably appoints the Missouri Secretary of State as its agent to accept such service of process. A copy of any service of process accepted by the Missouri Secretary of State as Corizon, Inc.'s agent shall be mailed to 105 Westpark Dr., Suite 200, Brentwood, TN 37027.
- 8.) This conversion has been approved in accordance with the provisions of Section 351.409 of the General and Business Corporation Law of Missouri.
- 9.) The proposed conversion shall be effective as of 10:59 p.m. Eastern Standard Time on December 31, 2013.



IN WITNESS WHEREOF, the undersigned have executed this Certificate on the
30th day of December, A.D. 2013.

By: 

Name: Martin A Moore

Treasurer



State of Missouri

Jason Kander, Secretary of State

Corporations Division
PO Box 778 / 600 W. Main St., Rm. 322
Jefferson City, MO 65102

Articles of Organization

(Submit with filing fee of \$105.00)

1. The name of the limited liability company is:

Corizon, LLC

(Must include "Limited Liability Company," "Limited Company," "LC," "L.C.," "LLC," or "LLC")

2. The purpose(s) for which the limited liability company is organized: The purpose of Corizon, LLC is to engage in any activity for which limited liability companies may be organized in the State of Missouri.

3. The name and address of the limited liability company's registered agent in Missouri is:

C T Corporation System

120 South Central Avenue

Clayton, MO 63105

Name

Street Address: May not use PO Box unless street address also provided

City/State/Zip

4. The management of the limited liability company is vested in: ☒ managers ☐ members (check one)

5. The events, if any, on which the limited liability company is to dissolve or the number of years the limited liability company is to continue, which may be any number or perpetual: Corizon, LLC shall have a perpetual existence.

(The answer to this question could cause possible tax consequences, you may wish to consult with your attorney or accountant)

6. The name(s) and street address(es) of each organizer (PO box may only be used in addition to a physical street address):

(Organizer(s) are not required to be member(s), manager(s) or owner(s))

Sharon Moy
Paul Hastings LLP
191 N. Wacker Dr., 30th Floor
Chicago, IL 60606

7. ☐ Series LLC (OPTIONAL) Pursuant to Section 347.186, the limited liability company may establish a designated series in its operating agreement. The names of the series must include the full name of the limited liability company and are the following:

New Series:

☐ The limited liability company gives notice that the series has limited liability.

New Series:

☐ The limited liability company gives notice that the series has limited liability.

New Series:

☐ The limited liability company gives notice that the series has limited liability.

(Each separate series must also file an Attachment Form LLC 1A.)

Name and address to return filed document:

Name: _____

Address: _____

City, State, and Zip Code: _____

LLC-1 (08/2013)

8. The effective date of this document is the date it is filed by the Secretary of State of Missouri unless a future date is otherwise indicated: 10:59 p.m. Eastern Standard Time on December 31, 2013
(Date may not be more than 90 days after the filing date in this office)

In Affirmation thereof, the facts stated above are true and correct:

(The undersigned understands that false statements made in this filing are subject to the penalties provided under Section 575.040, RSMo)

All organizers must sign:

<u>Sharon Moy</u>	<u>Sharon Moy</u>	<u>12/30/13</u>
Organizer Signature	Printed Name	Date

Organizer Signature	Printed Name	Date
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Organizer Signature	Printed Name	Date
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TAXATION DIVISION
P O BOX 3666
JEFFERSON CITY MO 65105-3666



Missouri
DEPARTMENT OF REVENUE

Telephone: (573) 751-9268
Fax: (573) 522-1265
E-mail: taxclearance@dor.mo.gov

CERTIFICATE OF TAX CLEARANCE

CORIZON INC
105 WESTPARK DR STE 200
BRENTWOOD TN 37027

DATE: DECEMBER 31, 2013

MISSOURI CORPORATION CHARTER NUMBER: 00246308

Thank you for contacting the Missouri Department of Revenue. In response to the corporation's request, a review of the tax records has been completed. All taxes owed, including all liabilities owed as determined by the Division of Employment Security, pursuant to Chapter 288, RSMo, have been paid.

This statement is not to be construed as limiting the authority of the Director of Revenue to pursue collection of liabilities resulting from final litigation, default in payment of any installment agreement entered into with the Director of Revenue, any successor liability that may become due in the future, or audits or reviews of the taxpayer's records as provided by law.

This Certificate of Tax Clearance must be presented to the Missouri Secretary of State's Office with any required paperwork and payment. For information concerning the Secretary of State's requirements, you may call their office at (573) 751-4153 or toll free at (866) 223-6535.

If you require additional information or assistance, please contact the Taxation Division at Post Office Box 3666, Jefferson City, Missouri 65105-3666 or by telephone at (573) 751-9268 during the hours of 8:00 a.m. to 5:00 p.m.

THIS CERTIFICATE REMAINS VALID FOR SIXTY (60) DAYS FROM THE ISSUANCE DATE. If you do not complete your transaction in sixty (60) days you must obtain a new Certificate of Tax Clearance. Additionally, a new Form 943, Request for Tax Clearance, may be required.

Sincerely,

A handwritten signature in cursive script that reads "Dwayne Maples".

Dwayne Maples
Administrator, Business Tax
Taxation Division

KO:DU0568

CBN001
201336500300961

STATE OF MISSOURI



Jason Kander
Secretary of State

CERTIFICATE OF CONVERSION

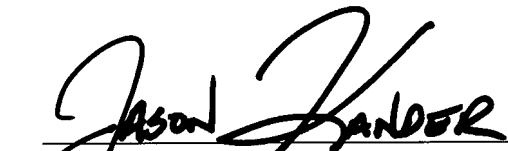
WHEREAS,

Corizon, LLC
LC1366450

filed its Articles of Organization with this office on the 31st day of December, 2013, and that filing was found to conform to the Missouri Limited Liability Company Act.

NOW, THEREFORE, I, JASON KANDER, Secretary of State of the State of Missouri, do by virtue of the authority vested in me by law, do certify and declare that on the 31st day of December, 2013, the above entity is a Limited Liability Company, organized in this state and entitled to any rights granted to Limited Liability Companies.

IN TESTIMONY WHEREOF, I hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri. Done at the City of Jefferson, this 31st day of December, 2013.


Secretary of State

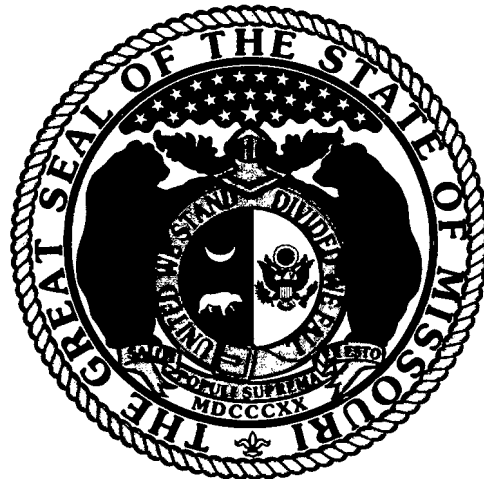


Exhibit “B”

F00823487

Date Filed: 6/27/2022

John R. Ashcroft

Missouri Secretary of State

**ARTICLES OF MERGER
OF
CORIZON, LLC
(a Missouri limited liability company)
WITH
CORIZON HEALTH OF NEW JERSEY, LLC
(a New Jersey limited liability company)
WITH
VALITÁS HEALTH SERVICES, INC.
(a Texas corporation)
WITH AND INTO
CORIZON HEALTH, INC.
(a Texas corporation)**

*In accordance with the provisions of Section 347.725 of the
Missouri Limited Liability Company Act*

FIRST: The name and state of formation of each constituent entity of the merger (the “**Merger**”) are as follows (i) Corizon, LLC, a Missouri limited liability company (“**Corizon**”) (ii) Corizon Health of New Jersey, LLC, a New Jersey limited liability company (“**Corizon NJ**”), (iii) Valitás Health Services, Inc., a Texas corporation (“**Valitás**”), and (iv) Corizon Health, Inc., a Texas corporation (“**Corizon Health**”, and together with Corizon, Corizon NJ and Valitás, the “**Merging Entities**,” and each a “**Merging Entity**”).

SECOND: An Agreement and Plan of Merger (the “**Merger Agreement**”), dated May 1, 2022, by and among the Merging Entities has been approved, adopted, certified, executed and acknowledged by each Merging Entity, in accordance with the requirements of Chapter 347.720 of the Missouri Limited Liability Company Act, the New Jersey Statutes, the Texas Business Organization Code and the organizing documents of the Merging Entities.

THIRD: Corizon Health shall survive the Merger, retain its name and remain a Texas corporation (the “**Surviving Corporation**”). The organizational documents of Corizon Health shall not be changed and shall be the organizational documents of the Surviving Corporation.

FOURTH: The Merger became effective May 5, 2022

FIFTH: An executed copy of the Merger Agreement is on file at the office of the Surviving Corporation, 205 Powell Place, Suite 104, Brentwood, TN 37027. CT Corporation is the registered agent for the Surviving Corporation and its address is 1999 Bryan Street, Suite 900, Dallas, TX 75201.

SIXTH: A copy of the Merger Agreement will be furnished by the Surviving Corporation, upon request and without cost, to any partner, shareholder, member, or their equivalent of any Merging Entity.

SEVENTH: Pursuant to Section 347.735.2 of the Missouri Limited Liability Company Act, the Surviving Corporation agrees that it is subject to service of process in Missouri in any proceeding for enforcement of any obligation of any Merging Entity organized under the laws of Missouri and for enforcement of any obligation of the Surviving Corporation arising from the Merger. The address to which service of process may be forwarded is 205 Powell Place, Suite 104, Brentwood, TN 37027.

[Signature page follows]

ORI-06272022-0806 State of Missouri

No of Pages 9 Pages



Merger - For Profit (F)

IN WITNESS WHEREOF, the following have caused these Articles of Merger to be signed as of the effective date.

CORIZON, LLC

By Corizon Health, Inc.

Its: Member

By: J. Scott King
Name: J. Scott King
Title: SVP and Chief Legal Officer

CORIZON HEALTH OF NEW JERSEY, LLC

By Corizon Health, Inc.

Its: Member

By: J. Scott King
Name: J. Scott King
Title: SVP and Chief Legal Officer

VALITAS HEALTH SERVICES, INC.

By: J. Scott King
Name: J. Scott King
Title: SVP and Chief Legal Officer

CORIZON HEALTH, INC.

By: J. Scott King
Name: J. Scott King
Title: SVP and Chief Legal Officer

Corporations Section
P.O.Box 13697
Austin, Texas 78711-3697



John B. Scott
Secretary of State

Office of the Secretary of State

Certificate of Fact

The undersigned, as Secretary of State of Texas, does hereby certify that a certificate of merger was filed in this office on May 03, 2022, effective May 05, 2022 12:01am. The certificate of merger provided the following:

(Constituent entities)			Entity Type
Name	File Number		
Valitas Health Services, Inc.	804544694	TX, USA	Domestic For-Profit Corporation
Corizon Health of New Jersey, LLC	Entity not of Record	NJ, USA	Foreign Limited Liability Company (LLC)
Corizon, LLC	10067306	MO, USA	Foreign Limited Liability Company (LLC)

Were merged with and into (Surviving entity)

Name	File Number		Entity Type
Corizon Health, Inc.	804544749	TX, USA	Domestic For-Profit Corporation

In testimony whereof, I have hereunto signed my name officially and caused to be impressed hereon the Seal of State at my office in Austin, Texas on June 17, 2022.



John B. Scott
Secretary of State

Corporations Section
P.O.Box 13697
Austin, Texas 78711-3697



John B. Scott
Secretary of State

Office of the Secretary of State

The undersigned, as Secretary of State of Texas, does hereby certify that the attached is a true and correct copy of each document on file in this office as described below:

Corizon Health, Inc.
Filing Number: 804544749

Certificate of Merger

May 03, 2022

In testimony whereof, I have hereunto signed my name officially and caused to be impressed hereon the Seal of State at my office in Austin, Texas on May 13, 2022.



A handwritten signature of John B. Scott in black ink.

John B. Scott
Secretary of State

Form 622**(Revised 12/15)**

Return in duplicate to:

Secretary of State

P.O. Box 13697

Austin, TX 78711-3697

512 463-5555

FAX: 512 463-5709

Filing Fee: see instructions



**Certificate of Merger
Combination Merger
Business Organizations Code**

FILED
In the Office of the
Secretary of State of Texas

MAY 03 2022

Corporations Section

Parties to the Merger

Pursuant to chapter 10 of the Texas Business Organizations Code, and the title applicable to each domestic filing entity identified below, the undersigned parties submit this certificate of merger.

The name, organizational form, state of incorporation or organization, and file number, if any, issued by the secretary of state for each organization that is a party to the merger are as follows:

Party 1Corizon Health, Inc.*Name of Organization*The organization is a For-Profit Corporation*Specify organizational form (e.g., for-profit corporation)*

It is organized under the laws of

TX USA*State* *Country*The file number, if any, is 804544749*Texas Secretary of State file number*Its principal place of business is 205 Powell Place, Suite 104*Address*Brentwood*City*TN*State*

☒ The organization will survive the merger. ☐ The organization will not survive the merger.

☐ The plan of merger amends the name of the organization. The new name is set forth below.

Name as Amended

Party 2Valitas Health Services, Inc.*Name of Organization*The organization is a For-Profit Corporation*Specify organizational form (e.g., for-profit corporation)*

It is organized under the laws of

TX USA*State* *Country*The file number, if any, is 804544694*Texas Secretary of State file number*Its principal place of business is 205 Powell Place, Suite 104*Address*Brentwood*City*TN*State*

☐ The organization will survive the merger. ☒ The organization will not survive the merger.

☐ The plan of merger amends the name of the organization. The new name is set forth below.

Name as Amended

Party 3

There are four party entities to this merger. Please see Attachment A for information regarding Party 3 and Party 4 to the merger.

Name of Organization

The organization is a

Specify organizational form (e.g., for-profit corporation)

It is organized under the laws of

The file number, if any, is _____

State _____ Country _____ Texas Secretary of State file number _____

Its principal place of business is _____

Address _____ City _____ State _____

☐ The organization will survive the merger. ☐ The organization will not survive the merger.

☐ The plan of merger amends the name of the organization. The new name is set forth below.

Name as Amended

Plan of Merger

☐ The plan of merger is attached.

If the plan of merger is not attached, the following statements must be completed.

Alternative Statements

Instead of providing the plan of merger, each domestic filing entity certifies that:

1. A plan of merger is on file at the principal place of business of each surviving, acquiring, or new domestic entity or non-code organization that is named in this form as a party to the merger or an organization created by the merger.
2. On written request, a copy of the plan of merger will be furnished without cost by each surviving, acquiring, or new domestic entity or non-code organization to any owner or member of any domestic entity that is a party to or created by the plan of merger and, if the certificate of merger identifies multiple surviving domestic entities or non-code organizations, to any creditor or obligee of the parties to the merger at the time of the merger if a liability or obligation is then outstanding.

Item 3A is the default selection. If the merger effected an amendment to, a restatement of, or an amendment and restatement of the certificate of formation of a surviving filing entity, you must select and complete one of the options shown below. Options 3B and 3C require the submission of the described attachment.

3A. No amendments to the certificate of formation of any surviving filing entity that is a party to the merger are effected by the merger.

3B. ☐ No amendments to the certificate of formation of any filing entity are being effected by the merger or by the restated certificate of formation of the surviving filing entity named in the attached restated certificate of formation.

3C. ☐ The plan of merger effected an amendment and restatement of the certificate of formation of a surviving filing entity. The amendments being made and the name of the surviving entity restating its certificate of formation are set forth in the attached restated certificate of formation containing amendments.

3D. ☐ The plan of merger effected amendments or changes to the following surviving filing entity's certificate of formation.

Name of filing entity effecting amendments

The changes or amendments to the filing entity's certificate of formation, other than the name change noted previously, are stated below.

Amendment Text Area

4. Organizations Created by Merger

The name, jurisdiction of organization, principal place of business address, and entity description of each entity or other organization to be created pursuant to the plan of merger are set forth below. The certificate of formation of each new domestic filing entity to be created is being filed with this certificate of merger.

<i>Name of New Organization 1</i>	<i>Jurisdiction</i>	<i>Entity Type (See instructions)</i>
<i>Principal Place of Business Address</i>	<i>City</i>	<i>State Zip Code</i>
<i>Name of New Organization 2</i>	<i>Jurisdiction</i>	<i>Entity Type (See instructions)</i>
<i>Principal Place of Business Address</i>	<i>City</i>	<i>State Zip Code</i>
<i>Name of New Organization 3</i>	<i>Jurisdiction</i>	<i>Entity Type (See instructions)</i>
<i>Principal Place of Business Address</i>	<i>City</i>	<i>State Zip</i>

Approval of the Plan of Merger

The plan of merger has been approved as required by the laws of the jurisdiction of formation of each organization that is a party to the merger and by the governing documents of those organizations.

☐ The approval of the owners or members of _____
Name of domestic entity
 was not required by the provisions of the BOC.

Effectiveness of Filing (Select either A, B, or C.)

A. ☐ This document becomes effective when the document is accepted and filed by the secretary of state.

B. ☐ This document becomes effective at a later date, which is not more than ninety (90) days from the date of signing. The delayed effective date is: _____

C. ☒ This document takes effect on the occurrence of the future event or fact, other than the passage of time. The 90th day after the date of signing is: July 31, 2022

The following event or fact will cause the document to take effect in the manner described below:

Text Area

This Certificate of Merger shall be effective as of the date the Form UMC-2 Certificate of Merger/Consolidation (Profit Corporations), which effectuates the merger addressed by this filing of Corizon Health, Inc., Valitas Health Services, Inc., Corizon Health of New Jersey, LLC and Corizon, LLC, is accepted as effective by the New Jersey Division of Revenue.

Tax Certificate

- ☐ Attached hereto is a certificate from the comptroller of public accounts that all taxes under title 2, Tax Code, have been paid by the non-surviving filing entity.
- ☒ Instead of providing the tax certificate, one or more of the surviving, acquiring or newly created organizations will be liable for the payment of the required franchise taxes.

Execution

The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument. The undersigned certifies that the statements contained herein are true and correct, and that the person signing is authorized under the provisions of the Business Organizations Code, or other law applicable to and governing the merging entity, to execute the filing instrument.

Date: May 2, 2022

Corizon Health, Inc.

Merging Entity Name

J. Scott King

Signature of authorized person (see instructions)

J. Scott King

Printed or typed name of authorized person

Corizon, LLC

Merging Entity Name

J. Scott King

Signature of authorized person (see instructions)

J. Scott King

Printed or typed name of authorized person

Valitas Health Services, Inc.

Merging Entity Name

J. Scott King

Signature of authorized person (see instructions)

J. Scott King

Printed or typed name of authorized person

Corizon Health of New Jersey, LLC

Merging Entity Name

J. Scott King

Signature of authorized person (see instructions)

J. Scott King

Printed or typed name of authorized person

**ATTACHMENT A TO
CERTIFICATE OF COMBINATION MERGER FOR
CORIZON HEALTH, INC.:
VALITAS HEALTH SERVICES, INC.
CORIZON, LLC
CORIZON HEALTH OF NEW JERSEY, LLC**

Parties to the Merger:

Party 1

Name: Corizon Health, Inc.,

Type: for-profit corporation

Jurisdiction: organized under the laws of the State of Texas

Texas Secretary of State File Number: 804544749

Principal Place of Business: 205 Powell Place, Suite 104, Brentwood, TN 37027

Survival: The organization will survive the Merger

No Name Change: Corizon Health, Inc. retains its name following the Merger

Party 2

Name: Valitas Health Services, Inc.

Type: for-profit corporation

Jurisdiction: organized under the laws of the State of Texas

Texas Secretary of State File Number: 804544694

Principal Place of Business: 205 Powell Place, Suite 104, Brentwood, TN 37027

No Survival: The organization will not survive the Merger

Party 3

Name: Corizon Health of New Jersey, LLC

Type: for-profit limited liability company

Jurisdiction: organized under the laws of the State of New Jersey, U.S.A.

Texas Secretary of State File Number: N/A

Principal Place of Business: 205 Powell Place, Suite 104, Brentwood, TN 37027

No Survival: The organization will not survive the Merger

Party 4

Name: Corizon, LLC

Type: for-profit limited liability company

Jurisdiction: organized under the laws of the State of Missouri, U.S.A.

Texas Secretary of State File Number: 10067306

Principal Place of Business: 205 Powell Place, Suite 104, Brentwood, TN 37027

No Survival: The organization will not survive the Merger

STATE OF MISSOURI



John R. Ashcroft
Secretary of State

CERTIFICATE OF MERGER FOREIGN CORPORATION SURVIVING

WHEREAS, Articles of Merger of the following entities:

Corizon, LLC-- LC1366450

CORIZON HEALTH OF NEW JERSEY, LLC - a New Jersey not qualified

VALITAS HEALTH SERVICES, INC. - a Texas not qualified

INTO:

CORIZON HEALTH, INC. -- F00823487

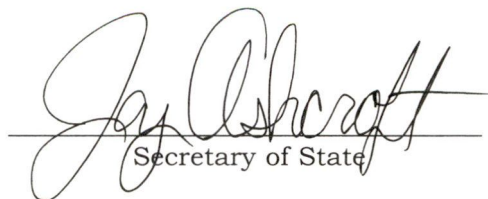
organized and existing under the laws of Missouri, New Jersey and Texas have been received, found to conform to law, and filed.

NOW, THEREFORE, I, JOHN R. ASHCROFT, Secretary of State of the State of Missouri, issue this Certificate of Merger, certifying that the merger of the aforementioned with

CORIZON HEALTH, INC. - F00823487

as the survivor, shall be effective on the date on which the same becomes effective in the State of Texas. Effective date: **May 05, 2022**

IN TESTIMONY WHEREOF, I hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri. Done at the City of Jefferson, this 27th day of June, 2022.


Secretary of State

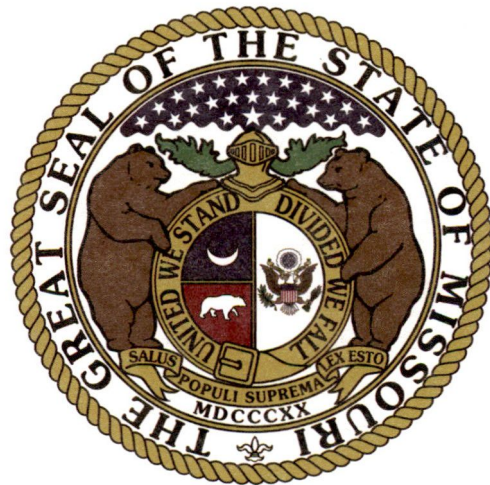


Exhibit “C”



State of Missouri

John R. Ashcroft, Secretary of State

Corporations Division
PO Box 778 / 600 W. Main St., Rm. 322
Jefferson City, MO 65102

F00823487
Date Filed: 6/30/2022
John R. Ashcroft
Missouri Secretary of State

Application for an Amended Certificate of Authority for a Foreign Corporation

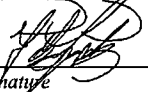
(Submit with filing fee of \$25.00)

The below corporation, relating to amending its certificate of authority of Foreign Corporation, does hereby state:

- Its name is: Corizon Health, Inc. Missouri Charter #: F00823487
Incorporated in the State of: Texas
Qualified in the State of Missouri on June 14, 2007
month/day/year
- By appropriate corporate action on: June 1, 2022, the corporation:
month/day/year
☒ Changed its corporate name to: Tehum Care Services, Inc.
Name it will use in Missouri if new name not available: _____
☐ Changed its period of duration to: _____
☐ Changed the state or country of its incorporation to: _____
- There is attached hereto a Certificate of the Secretary of State or other state authority of the State of Texas relating to the amendment(s), set forth in item 2 above and showing that the Corporation is in existence and in good standing in said State. (Certificate must be less than 60 days old.)
- Any other amendments to the certificate: None
- The effective date of this document is the date it is filed by the Secretary of State of Missouri, unless you indicate a future date, as follows: _____
(Date may not be more than 90 days after the filing date in this office)

In Affirmation thereof, the facts stated above are true and correct:

(The undersigned understands that false statements made in this filing are subject to the penalties provided under Section 575.040, RSMo)

	<u>Isaac Lefkowitz</u>	<u>Senior Vice President</u>	<u>6/15/2022</u>
<i>Authorized Signature</i>	<i>Printed Name</i>	<i>Title</i>	<i>month/day/year</i>

Attached is an original current certificate attesting to the change, duly authenticated by the secretary of state or other official having custody of corporate records in the state or country of incorporation.

Name and address to return filed document:

Name: _____
Address: _____
City, State, and _____

ORI-06302022-0602 State of Missouri

No of Pages 8 Pages



Articles of Amendment

Corporations Section
P.O.Box 13697
Austin, Texas 78711-3697



John B. Scott
Secretary of State

Office of the Secretary of State

CERTIFICATE OF FILING OF

Tehum Care Services, Inc.
804544749

[formerly: Corizon Health, Inc.]

The undersigned, as Secretary of State of Texas, hereby certifies that a Certificate of Amendment for the above named entity has been received in this office and has been found to conform to the applicable provisions of law.

ACCORDINGLY, the undersigned, as Secretary of State, and by virtue of the authority vested in the secretary by law, hereby issues this certificate evidencing filing effective on the date shown below.

Dated: 06/01/2022

Effective: 06/01/2022



A handwritten signature in black ink, appearing to read "John B. Scott".

John B. Scott
Secretary of State

Corporations Section
P.O.Box 13697
Austin, Texas 78711-3697



John B. Scott
Secretary of State

Office of the Secretary of State

June 13, 2022

Attn: CT CORPORATION SYSTEM

CT Corporation System
701 Brazos Street, Ste. 720
Austin, TX 78701 USA

RE: Tehum Care Services, Inc.
File Number: 804544749

It has been our pleasure to file the Certificate of Amendment for the referenced entity. Enclosed is the certificate evidencing filing. Payment of the filing fee is acknowledged by this letter.

If we may be of further service at any time, please let us know.

Sincerely,

Corporations Section
Business & Public Filings Division
(512) 463-5555

Enclosure

Filing#:804544749 Document#:1152870170002 Filed On 6/1/2022 received by Upload

Form 424**(Revised 05/11)**

Submit in duplicate to:

Secretary of State

P.O. Box 13697

Austin, TX 78711-3697

512 463-5555

FAX: 512/463-5709

Filing Fee: See instructions



This space reserved for office use.

Certificate of Amendment**Entity Information**

The name of the filing entity is:

Corizon Health, Inc.

State the name of the entity as currently shown in the records of the secretary of state. If the amendment changes the name of the entity, state the old name and not the new name.

The filing entity is a: (Select the appropriate entity type below.)

☒ For-profit Corporation☐ Professional Corporation☐ Nonprofit Corporation☐ Professional Limited Liability Company☐ Cooperative Association☐ Professional Association☐ Limited Liability Company☐ Limited PartnershipThe file number issued to the filing entity by the secretary of state is: 804544749The date of formation of the entity is: 04/28/2022**Amendments****1. Amended Name**

(If the purpose of the certificate of amendment is to change the name of the entity, use the following statement)

The amendment changes the certificate of formation to change the article or provision that names the filing entity. The article or provision is amended to read as follows:

The name of the filing entity is: (state the new name of the entity below)

Tehum Care Services, Inc.

The name of the entity must contain an organizational designation or accepted abbreviation of such term, as applicable.

2. Amended Registered Agent/Registered Office

The amendment changes the certificate of formation to change the article or provision stating the name of the registered agent and the registered office address of the filing entity. The article or provision is amended to read as follows:

Registered Agent
(Complete either A or B, but not both. Also complete C.)

☐ A. The registered agent is an organization (cannot be entity named above) by the name of:

OR

☐ B. The registered agent is an individual resident of the state whose name is:

First Name	M.I.	Last Name	Suffix
The person executing this instrument affirms that the person designated as the new registered agent has consented to serve as registered agent.			

C. The business address of the registered agent and the registered office address is:

Street Address (No P.O. Box)	City	TX State	Zip Code

3. Other Added, Altered, or Deleted Provisions

Other changes or additions to the certificate of formation may be made in the space provided below. If the space provided is insufficient, incorporate the additional text by providing an attachment to this form. Please read the instructions to this form for further information on format.

Text Area (The attached addendum, if any, is incorporated herein by reference.)

☐ Add each of the following provisions to the certificate of formation. The identification or reference of the added provision and the full text are as follows:

☐ Alter each of the following provisions of the certificate of formation. The identification or reference of the altered provision and the full text of the provision as amended are as follows:

☐ Delete each of the provisions identified below from the certificate of formation.

Statement of Approval

The amendments to the certificate of formation have been approved in the manner required by the Texas Business Organizations Code and by the governing documents of the entity.

Effectiveness of Filing (Select either A, B, or C.)

- A. ☒ This document becomes effective when the document is filed by the secretary of state.
- B. ☐ This document becomes effective at a later date, which is not more than ninety (90) days from the date of signing. The delayed effective date is: _____
- C. ☐ This document takes effect upon the occurrence of a future event or fact, other than the passage of time. The 90th day after the date of signing is: _____

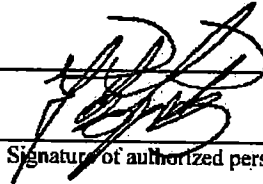
The following event or fact will cause the document to take effect in the manner described below:

Execution

The undersigned signs this document subject to the penalties imposed by law for the submission of a materially false or fraudulent instrument and certifies under penalty of perjury that the undersigned is authorized under the provisions of law governing the entity to execute the filing instrument.

Date: June 1, 2022

By: _____



Signature of authorized person

Isaac Lefkowitz

Printed or typed name of authorized person (see instructions)

Corporations Section
P.O.Box 13697
Austin, Texas 78711-3697



John B. Scott
Secretary of State

Office of the Secretary of State

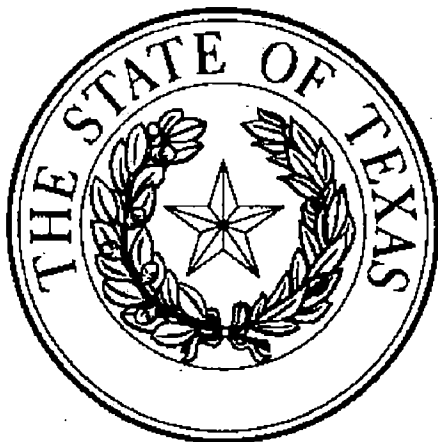
Certificate of Fact

The undersigned, as Secretary of State of Texas, does hereby certify that the document, Public Information Report (PIR) for Tehum Care Services, Inc. (file number 804544749), a Domestic For-Profit Corporation, was filed in this office on December 31, 2021.

It is further certified that the entity status in Texas is in existence.

Delayed Effective date: June 09, 2022

In testimony whereof, I have hereunto signed my name officially and caused to be impressed hereon the Seal of State at my office in Austin, Texas on June 20, 2022.



A handwritten signature of John B. Scott in black ink.

John B. Scott
Secretary of State

NAME RESERVATION – RELEASE LETTER

June 24, 2022

TO: Missouri Secretary of State

RE: Tehum Care Services, Inc. Name Reservation

To Whom it May Concern:

Please use this letter as a release of the current name reservation for Tehum Care Services, Inc.

The name reservation for Tehum Care Services, Inc. is hereby released for the purpose of the name change amendment filing.

Thank you,



Kaity Toon

CT Corporation

STATE OF MISSOURI



John R. Ashcroft
Secretary of State

AMENDED CERTIFICATE OF AUTHORITY OF A FOREIGN CORPORATION

I, JOHN R. ASHCROFT, Secretary of State, of the State of Missouri, do hereby certify,

WHEREAS,

TEHUM CARE SERVICES, INC.
F00823487

Formerly,

CORIZON HEALTH, INC.

incorporated under Law of the state of Texas and now in existence and in good standing in said state, and qualified to transact business in Missouri has delivered to me, duly authenticated evidence of an amendment to its Articles of Incorporation as provided by law, and has, in all respects, complied with the requirements of General and Business Corporation Law of Missouri, governing Amendments to the Articles of Incorporation of Foreign Corporations, and in accordance therewith issue this Certificate of Amendment.

IN TESTIMONY WHEREOF, I hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri. Done at the City of Jefferson, this 30th day of June, 2022.


Secretary of State

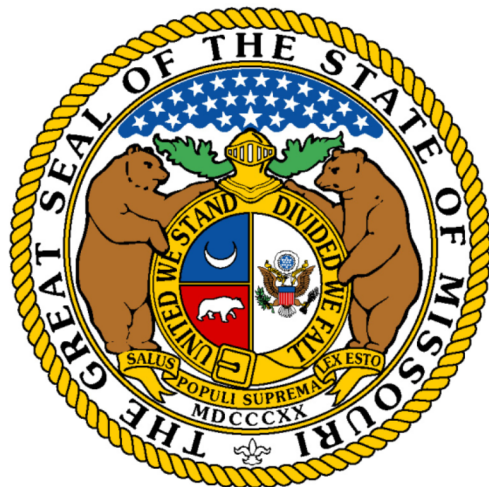


Exhibit “D”

« Return to search results

Case Information

Case Number:	CV2018-008861	Judge:	Kreamer, Joseph
File Date:	6/14/2018	Location:	Downtown
Case Type:	Civil		

Party Information

Party Name	Relationship	Sex	Attorney
Jennifer Power	Plaintiff	Female	Anne Findling
Corizon Health Inc	Defendant		Mandi Karvis
Corizon Inc	Defendant		Mandi Karvis
Corizon L L C	Defendant		Mandi Karvis
Dale A King	Defendant	Male	Perry Casazza
Antonio R Tuccino	Defendant	Male	Perry Casazza
Steven Gallardo	Defendant	Male	Dennis Wilenchik

Case Documents

Filing Date	Description	Docket Date	Filing Party
9/17/2025	ODI - Order Of Dismissal	9/17/2025	
NOTE:	ORDER TO DISMISS AS TO DEFENDANT STATE OF ARIZONA ONLY		
9/16/2025	022 - ME: Order Signed	9/16/2025	
9/15/2025	ODI - Order Of Dismissal	9/16/2025	
NOTE:	WITH PREJUDICE		
9/12/2025	SFD - Stipulation For Dismissal	9/15/2025	
NOTE:	Stipulation to Dismiss as to Defendant State of Arizona Only WITH PREJUDICE		
8/29/2025	022 - ME: Order Signed	8/29/2025	
8/28/2025	ORD - Order	9/3/2025	
NOTE:	THIS MATTER WILL REMAIN STAYED AS TO THE CORIZON DEFENDANTS ONLY PENDING THE RESOLUTION OF PLAINTIFFS CLAIM AGAINST THE CORIZON DEFENDANTS THROUGH THE CLAIM DISTRIBUTION PROCEDURES ESTABLISHED IN THE TEHUM CARE SERVICES BANKRUPTCY		
8/19/2025	REP - Report	8/21/2025	
NOTE:	Plaintiff's Status Report re Bankruptcy Case		
7/22/2025	OCC - Order Continuing on Inactive/Dismissal Calendar	7/22/2025	
NOTE:	ORDER TO REMAIN ON THE DISMISSAL CALENDAR		
7/16/2025	STP - Stipulation	7/17/2025	
NOTE:	Stipulation to Extend Dismissal Deadline		
4/25/2025	375 - Case on Dismissal Calendar	4/25/2025	
4/25/2025	022 - ME: Order Signed	4/25/2025	
4/24/2025	ORD - Order	4/28/2025	
NOTE:	VACATGING THE TRIAL IN THIS MATTER TO BE SET BACK OUT CALENDAR IF NECESSARY		
4/23/2025	NOS - Notice Of Settlement	4/23/2025	
NOTE:	Notice of Settlement and Motion to Stay		
4/3/2025	RES - Response	4/4/2025	
NOTE:	Plaintiff's Response to Defendant State of Arizona's Motion for Partial Summary Judgment		
4/3/2025	RES - Response	4/4/2025	
NOTE:	PLAINTIFF'S RESPONSE TO DEFENDANT STATE OF ARIZONA'S STATEMENT OF FACTS IN SUPPORT OF DEFENDANT'S MOTION FOR PARTIAL SUMMARY JUDGMENT		
3/26/2025	023 - ME: Order Entered By Court	3/26/2025	
3/7/2025	083 - ME: Conference Reset/Cont	3/7/2025	
2/28/2025	MSJ - Motion For Summary Judgment	3/3/2025	
NOTE:	DEFENDANT STATE OF ARIZONA'S MOTION FOR PARTIAL SUMMARY JUDGMENT		
2/28/2025	SOF - Statement Of Facts	3/3/2025	
NOTE:	Defendant State of Arizonas Statement of Facts in Support of Motion for Partial Summary Judgment		
2/20/2025	NOT - Notice	2/20/2025	
NOTE:	Notice of Change of Law Firm		
2/19/2025	REP - Report	2/20/2025	
NOTE:	Plaintiff's Status Report re Bankruptcy Case		
2/10/2025	005 - ME: Hearing	2/10/2025	
2/5/2025	022 - ME: Order Signed	2/5/2025	

2/4/2025	ORD - Order	2/10/2025
NOTE:		
GRANTING THE STIPULATION AND SCHEDULING THE IN-CAMERA REVIEW OF PLAINTIFFS CONFIDENTIAL SETTLEMENT AGREEMENT WITH CORRECT CARE SOLUTIONS LLC AND GEO GROUP INC FOR PRIOR TO 2/7/2025 ORAL ARGUMENT		
1/31/2025	STP - Stipulation	1/31/2025
NOTE:		
STIPULATION TO IN-CAMERA REVIEW IN ADVANCE OF ORAL ARGUMENT BY THE COURT		
1/29/2025	NSC - Notice of Substitution of Counsel	1/30/2025
NOTE:		
Notice of Appearance and Substitution of Counsel Within the Firm		
1/21/2025	089 - ME: Trial Setting	1/21/2025
1/14/2025	094 - ME: Oral Argument Set	1/14/2025
12/19/2024	REL - Reply	12/19/2024
NOTE:		
Defendants Reply to Plaintiffs Response to Motion to Compel Plaintiffs Settlement		
12/19/2024	NOT - Notice	12/20/2024
NOTE:		
NOTICE OF ERRATA		
12/18/2024	RES - Response	12/18/2024
NOTE:		
PLAINTIFF'S RESPONSE TO MOTION TO COMPEL PLAINTIFF'S SETTLEMENT AGREEMENT WITH CORRECT CARE SOLUTIONS, LLC AND GEO GROUP, INC.		
12/12/2024	NOT - Notice	12/12/2024
NOTE:		
PLAINTIFF'S BRIEF RE: STATUS OF THE CORIZON/YESCARE/TEHUM BANKRUPTCY		
12/12/2024	MTC - Motion To Compel	12/13/2024
NOTE:		
MOTION TO COMPEL PLAINTIFF'S SETTLEMENT AGREEMENT WITH CORRECT CARE SOLUTIONS, LLC AND GEO GROUP, INC.		
12/6/2024	028 - ME: Status Conference Set	12/6/2024
12/3/2024	023 - ME: Order Entered By Court	12/3/2024
11/26/2024	JSR - Joint Scheduling Report	11/27/2024
NOTE:		
Joint Status Report		
11/25/2024	066 - ME: Case Reassigned	11/25/2024
11/25/2024	026 - ME: Pretrial Conference Set	11/25/2024
11/22/2024	083 - ME: Conference Reset/Cont	11/22/2024
11/22/2024	001 - ME: Disqualification	11/22/2024
11/13/2024	NOT - Notice	11/14/2024
NOTE:		
NOTICE AND REQUEST OF DEFENDANT STATE OF ARIZONA FOR RECUSAL OF ASSIGNED JUDGE		
11/4/2024	NAR - Notice Of Appearance	11/5/2024
NOTE:		
Notice of Appearance / EFILE BILLING \$245.00		
10/25/2024	041 - ME: Scheduling Conference Set	10/25/2024
10/24/2024	NAR - Notice Of Appearance	10/24/2024
NOTE:		
Notice of Appearance		
10/8/2024	REQ - Request	10/9/2024
NOTE:		
Request for Rule 16 Conference		
10/3/2024	NSC - Notice of Substitution of Counsel	10/4/2024
NOTE:		
Notice of Substitution of Counsel Within Firm		
8/26/2024	023 - ME: Order Entered By Court	8/26/2024
7/24/2024	REP - Report	7/24/2024
NOTE:		
Plaintiff's Status Report re Bankruptcy Case		
1/8/2024	023 - ME: Order Entered By Court	1/8/2024
12/21/2023	REP - Report	12/27/2023
NOTE:		
Plaintiff's Status Report re Bankruptcy Case		
4/7/2023	019 - ME: Ruling	4/7/2023
3/9/2023	RES - Response	3/13/2023
NOTE:		
Response to Motion for Clarification		
3/8/2023	MOT - Motion	3/11/2023
NOTE:		
PLAINTIFF'S MOTION FOR CLARIFICATION		
3/6/2023	928 - ME: Stay of Proceedings	3/6/2023
2/14/2023	NOB - Notice Of Filing Bankruptcy	2/15/2023
NOTE:		
DEFENDANT CORIZON HEALTH INC., CORIZON, INC., AND CORIZON, LLC'S SUGGESTION OF BANKRUPTCY AND NOTICE OF AUTOMATIC STAY		
11/29/2022	NOT - Notice	11/30/2022
NOTE:		
Notice of Settlement Conference		
11/22/2022	005 - ME: Hearing	11/22/2022
11/22/2022	ORD - Order	11/22/2022
NOTE:		
ORDERED granting the Stipulation		
11/16/2022	STP - Stipulation	11/17/2022
NOTE:		
Stipulation to Extend Deadline to Complete Settlement Conference		
11/15/2022	ODI - Order Of Dismissal	11/15/2022
NOTE:		
ORDER OF DISMISSAL OF DEFENDANTS CORRECT CARE SOLUTIONS, LLC AND GEO GROUP, INC. ONLY WITH PREJUDICE		
11/10/2022	ORD - Order	11/10/2022
NOTE:		
ORDER EXTENDING DISMISSAL CALENDAR DEADLINE AS TO DEFENDANTS CORRECT CARE SOLUTIONS, LLC AND GEO GROUP, INC. ONLY		
11/10/2022	SFD - Stipulation For Dismissal	11/12/2022
NOTE:		
Stipulation to Dismiss Defendants Correct Care Solutions, LLC and GEO Group, Inc. Only with Prejudice		
11/7/2022	SFC - Stipulation For Continuance	11/8/2022
NOTE:		

STIPULATION TO EXTEND DISMISSAL CALENDAR DEADLINE AS TO DEFENDANTS CORRECT CARE SOLUTIONS, LLC AND GEO GROUP, INC. ONLY

10/20/2022	095 - ME: Oral Argument Reset	10/20/2022
10/14/2022	095 - ME: Oral Argument Reset	10/14/2022
10/10/2022	070 - ME: Settlement Conference Set	10/10/2022
9/27/2022	089 - ME: Trial Setting	9/27/2022
9/27/2022	070 - ME: Settlement Conference Set	9/27/2022
9/16/2022	377 - Case on Dismissal Calendar - Partial	9/16/2022
9/15/2022	083 - ME: Conference Reset/Cont	9/15/2022
9/13/2022	094 - ME: Oral Argument Set	9/13/2022
9/8/2022	NOS - Notice Of Settlement	9/14/2022
NOTE:	Defendants Correct Care Solutions, LLC and GEO Group, Inc's Notice of Settlement	
8/31/2022	REL - Reply	9/3/2022
NOTE:	Plaintiff's Reply in Support of Motion for Partial Summary Judgment	
8/30/2022	ORD - Order	8/30/2022

NOTE:
GRANTING STIPULATION TO EXTEND DEADLINE TO FILE DISPOSITIVE MOTIONS AS TO DEFENDANTS CORRECT CARE SOLUTIONS, LLC AND GEO GROUP, INC. ONLY

8/22/2022	STP - Stipulation	8/26/2022
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NOTE:
STIPULATION TO EXTEND DEADLINE TO FILE DISPOSITIVE MOTIONS AS TO DEFENDANTS CORRECT CARE SOLUTIONS, LLC AND GEO GROUP, INC. ONLY

8/17/2022	SOF - Statement Of Facts	8/23/2022
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NOTE:
DEFENDANT STATE OF ARIZONA'S CONTROVERTING STATEMENT OF FACTS IN OPPOSITION TO PLAINTIFF'S MOTION FOR PARTIAL SUMMARY JUDGMENT

8/17/2022	RES - Response	8/23/2022
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NOTE: Response in Opposition to Motion for Partial Summary Judgment

8/16/2022	ORD - Order	8/16/2022
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NOTE:
ORDER GRANTING STIPULATION TO EXTEND DEADLINE TO FILE DISPOSITIVE MOTIONS AS TO DEFENDANTS CORRECT CARE SOLUTIONS, LLC AND GEO GROUP, INC. ONLY

8/16/2022	NOT - Notice	8/20/2022
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NOTE: Second Notice of Extension of Time to File Response to Motion for PARTIAL Summary Judgment

8/8/2022	STP - Stipulation	8/11/2022
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NOTE:
STIPULATION TO EXTEND DEADLINE TO FILE DISPOSITIVE MOTIONS AS TO DEFENDANTS CORRECT CARE SOLUTIONS, LLC AND GEO GROUP, INC. ONLY

8/3/2022	ORD - Order	8/3/2022
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NOTE:
ORDER GRANTING STIPULATION TO EXTEND DEADLINE TO FILE DISPOSITIVE MOTIONS AS TO DEFENDANTS CORRECT CARE SOLUTIONS, LLC AND GEO GROUP, INC. ONLY

7/26/2022	NOT - Notice	7/29/2022
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NOTE: First Notice of Extension

7/25/2022	STP - Stipulation	7/28/2022
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NOTE:
STIPULATION TO EXTEND DEADLINE TO FILE DISPOSITIVE MOTIONS AS TO DEFENDANTS CORRECT CARE SOLUTIONS, LLC AND GEO GROUP, INC. ONLY

7/7/2022	ORD - Order	7/7/2022
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NOTE: ORDER EXTENDING DEADLINE TO FILE DISPOSITIVE MOTIONS

6/24/2022	SOF - Statement Of Facts	6/27/2022
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NOTE: Plaintiffs Separate Statement of Facts in Support of Motion for Partial Summary Judgment

6/24/2022	MSJ - Motion For Summary Judgment	6/27/2022
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NOTE: Plaintiff's Motion for Partial Summary Judgment

6/24/2022	STP - Stipulation	6/28/2022
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NOTE: Stipulation to Extend Deadline to File Dispositive Motions

5/11/2022	ANS - Answer	5/13/2022
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NOTE:
DEFENDANTS CORRECT CARE SOLUTIONS, LLC AND GEO GROUP, INC'S ANSWER TO PLAINTIFF'S SECOND AMENDED COMPLAINT

5/5/2022	ANS - Answer	5/9/2022
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NOTE: ANSWER TO PLAINTIFF'S SECOND AMENDED COMPLAINT ON BEHALF OF DEFENDANTS CORIZON

5/5/2022	NJT - Not Demand For Jury Trial	5/9/2022
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NOTE: DEMAND FOR JURY TRIAL

5/2/2022	ANS - Answer	5/5/2022
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NOTE:
DEFENDANT STEVEN GALLARDOs ANSWER to SECOND AMENDED COMPLAINT / CO-CHG \$245 RECEIPT # 28756911

4/11/2022	AMC - Amended Complaint	4/14/2022
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NOTE: Second Amended Complaint

3/28/2022	ORD - Order	3/28/2022
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NOTE: grants the Motion

3/9/2022	REL - Reply	3/12/2022
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NOTE: Plaintiff's Reply in Support of Motion for Leave to File Second Amended Complaint

3/7/2022	RES - Response	3/11/2022
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NOTE:
DEFENDANTS CORRECT CARE SOLUTIONS, LLC AND GEO GROUP, INC'S RESPONSE TO PLAINTIFF'S MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT

2/11/2022	MTA - Motion To Amend	2/18/2022
NOTE:	Plaintiff Motion for Leave to File Second Amended Complaint	
2/2/2022	NOT - Notice	2/8/2022
NOTE:	Defendants Correct Care Solutions, LLC and GEO Group, Inc's Notice of Disassociation of Counsel Within FIRM	
12/17/2021	CAN - Credit Memo Appearance Fee Paid	12/17/2021
NOTE:	Credit Memo/Appearance Fee Paid	
12/13/2021	SCO - Scheduling Order	12/13/2021
NOTE:	SCHEDULING ORDER	
12/7/2021	JSR - Joint Scheduling Report	12/9/2021
NOTE:	Joint Report	
12/7/2021	NAR - Notice Of Appearance	12/10/2021
NOTE:	DEFENDANTS CORRECT CARE SOLUTIONS, LLC AND GEO GROUP, INC'S NOTICE OF APPEARANCE	
11/30/2021	NAR - Notice Of Appearance	12/3/2021
NOTE:	NOTICE OF APPEARANCE AND SUBSTITUTION OF COUNSEL WITHIN THE FIRM	
11/9/2021	023 - ME: Order Entered By Court	11/9/2021
9/29/2021	REQ - Request	10/1/2021
NOTE:	Request for Rule 16 Conference	
8/19/2021	LRM-Letter of Remand from Federal District Court	8/19/2021
3/18/2019	AFS - Affidavit Of Service	3/19/2019
NOTE:	Certificate of Service	
3/6/2019	NUS - Notice Of Removal Us District Court	3/7/2019
NOTE:	NOTICE OF REMOVAL OF THIS ACTION TO DISTRICT COURT	
3/5/2019	ACS - Acceptance Of Service	3/6/2019
NOTE:	Acceptance of Service on Behalf of Corizon	
3/1/2019	SUM - Summons	3/5/2019
3/1/2019	SUM - Summons	3/5/2019
3/1/2019	AFS - Affidavit Of Service	3/6/2019
NOTE:	CORRECT CARE SOLUTIONS	
3/1/2019	AFS - Affidavit Of Service	3/6/2019
NOTE:	THE GEO GROUP	
2/6/2019	ORD - Order	2/6/2019
NOTE:	that the First Amended Complaint attached as Exhibit 1 to Plaintiffs' Motion may be filed and made part of the record.	
2/6/2019	AMC - Amended Complaint	2/6/2019
NOTE:	First Amended Complaint	
1/7/2019	MTA - Motion To Amend	1/8/2019
NOTE:	Motion for Leave to Amend Complaint	
10/26/2018	ANS - Answer	10/29/2018
NOTE:	Answer	
10/3/2018	ANS - Answer	10/4/2018
NOTE:		
	Answer to Plaintiff's Complaint on behalf of Defendants Corizon Health, Inc., Corizon Inc., Corizon LLC, and State of Arizona -- EFILE BILLING \$245	
10/3/2018	NJT - Not Demand For Jury Trial	10/4/2018
NOTE:	Demand for Jury Trial on behalf of Defendants	
10/3/2018	CCA - Cert Compulsory Arbitration	10/4/2018
NOTE:	Certificate of Compulsory Arbitration on behalf of Defendants	
8/27/2018	AFS - Affidavit Of Service	8/30/2018
NOTE:	CORIZON INC	
8/27/2018	AFS - Affidavit Of Service	8/30/2018
NOTE:	CORIZON HEALTH INC	
8/27/2018	AFS - Affidavit Of Service	8/30/2018
NOTE:	CORIZON LLC	
8/27/2018	AFS - Affidavit Of Service	8/30/2018
NOTE:	STATE OF ARIZONA	
8/27/2018	SUM - Summons	8/29/2018
8/27/2018	SUM - Summons	8/29/2018
8/27/2018	SUM - Summons	8/29/2018
8/27/2018	SUM - Summons	8/29/2018
8/22/2018	322 - ME: Notice Of Intent To Dismiss	8/22/2018
6/14/2018	COM - Complaint	6/15/2018
6/14/2018	CSH - Coversheet	6/15/2018
6/14/2018	CCN - Cert Arbitration - Not Subject	6/15/2018
6/14/2018	NJT - Not Demand For Jury Trial	6/15/2018
6/14/2018	CER - Certificate	6/15/2018
NOTE:	OF NOTICE INTENT TO PROVIDE EXPERT TESTIMONY PURSUANT TO A R S 12-2602	

Case Calendar

Date	Time	Event
7/25/2022	8:45	Pre-Trial Conference
8/25/2022	8:45	Pre-Trial Conference
9/19/2022	9:00	Pre-Trial Conference
9/20/2022	8:45	Pre-Trial Conference
10/28/2022	10:30	Oral Argument
11/21/2022	9:00	Oral Argument
2/15/2023	13:00	Civil Settlement Conference

4/14/2023	9:00	Pre-Trial Conference
5/22/2023	9:00	Trial
5/23/2023	9:30	Trial
5/24/2023	9:30	Trial
5/25/2023	9:30	Trial
5/30/2023	9:30	Trial
5/31/2023	9:30	Trial
6/1/2023	9:30	Trial
6/5/2023	9:30	Trial
11/13/2024	9:00	Pre-Trial Conference
12/2/2024	9:30	Pre-Trial Conference
12/2/2024	9:30	Pre-Trial Conference
1/10/2025	9:45	Pre-Trial Conference
1/16/2025	9:15	Status Conference
2/7/2025	10:00	Oral Argument
6/13/2025	9:00	Pre-Trial Conference
6/20/2025	14:30	Pre-Trial Conference
7/21/2025	8:30	Trial

Judgments

Date	(F)or / (A)gainst	Amount	Frequency	Type	Status
No records found.					

Exhibit “E”

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CASREF,CLOSED,DTE,MIDP,PROTO

**U.S. District Court
DISTRICT OF ARIZONA (Phoenix Division)
CIVIL DOCKET FOR CASE #: 2:19-cv-01546-DLR**

Power v. Arizona, State of et al
Assigned to: Senior Judge Douglas L Rayes
Case in other court: Ninth Circuit, 21-16436; Mandate 10/03/24
Maricopa County Superior Court, CV2018-008861
Cause: 28:1441 Petition for Removal- Civil Rights Act

Date Filed: 03/06/2019
Date Terminated: 09/12/2025
Jury Demand: Both
Nature of Suit: 550 Prisoner: Civil Rights
Jurisdiction: Federal Question

Plaintiff

Jennifer Power
*individually and on behalf of the statutory
beneficiaries of Monnie Washburn
estate of
Monnie Washburn*

represented by **Anne E Findling**
Robbins & Curtin PLLC
301 E Bethany Home Rd., Ste. B100
Phoenix, AZ 85012-3312
602-285-0100
Fax: 602-265-0267
Email: anne@rcmslaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

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Fax: 602-265-0267

Email: lauren@rcmslaw.com
ATTORNEY TO BE NOTICED

V.

Defendant

Arizona, State of
a governmental entity

represented by **Dennis Ira Wilenchik**
Wilenchik & Bartness PC
2810 N 3rd St., Ste. 103
Phoenix, AZ 85004
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Kara Lynn Klima
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TERMINATED: 03/12/2020

Defendant

Corizon Health Incorporated
*a Missouri corporation, doing business in
the State of Arizona*
TERMINATED: 02/06/2025

represented by **Anngelica N Davis**
Wicker Smith OHara McCoy & Ford PA
1 N Central Ave., Ste. 860
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LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Defendant

Corizon Incorporated

*a Missouri corporation, doing business in
the State of Arizona
TERMINATED: 02/06/2025*

represented by **Anngelica N Davis**
(See above for address)
*LEAD ATTORNEY
ATTORNEY TO BE NOTICED*

Mandi Jean Karvis
(See above for address)
*LEAD ATTORNEY
ATTORNEY TO BE NOTICED*

Defendant

Corizon LLC

*a foreign limited liability company
TERMINATED: 02/06/2025*

represented by **Anngelica N Davis**
(See above for address)
*LEAD ATTORNEY
ATTORNEY TO BE NOTICED*

Mandi Jean Karvis
(See above for address)
*LEAD ATTORNEY
ATTORNEY TO BE NOTICED*

Defendant

Correct Care Solutions LLC

*a foreign limited liability company doing
business in Arizona
TERMINATED: 02/06/2025*

represented by **Kevin Charles Nicholas**
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Email: msmith@grassolawfirm.com
*TERMINATED: 10/16/2024
LEAD ATTORNEY*

Defendant

GEO Group Incorporated

*a Florida Corporation doing business in
Arizona
TERMINATED: 02/06/2025*

represented by **Kevin Charles Nicholas**
(See above for address)
*LEAD ATTORNEY
ATTORNEY TO BE NOTICED*

Michael B Smith
(See above for address)
*TERMINATED: 10/16/2024
LEAD ATTORNEY*

Defendant

Dale A King

individually, Corrections Officer

represented by **Nathan Metzger**

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TERMINATED: 04/09/2025
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Kara Lynn Klima

Liberty Mutual Group - London, KY
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London, KY 40742
602-337-9644
Email: kara.klima@LibertyMutual.com
TERMINATED: 03/12/2020

Scott Michael Zerlaut

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Phoenix, AZ 85004
602-542-7664
Fax: 602-542-4085
Email: scott.zerlaut@azag.gov

TERMINATED: 10/16/2024
ATTORNEY TO BE NOTICED

Defendant

Antonio R Tuccino
individually, Corrections Officer

represented by **Nathan Metzger**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Perry Edward Casazza
(See above for address)
TERMINATED: 04/09/2025
LEAD ATTORNEY

Robert Grasso , Jr.
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Thomas J Shorall , Jr.
(See above for address)
TERMINATED: 10/16/2024
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Kara Lynn Klima
(See above for address)
TERMINATED: 03/12/2020

Scott Michael Zerlaut
(See above for address)
TERMINATED: 10/16/2024
ATTORNEY TO BE NOTICED

Defendant

Steven Gallardo
individually, Sergeant

represented by **Dennis Ira Wilenchik**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Caitlin Bartness Fitz-Maurice
(See above for address)
ATTORNEY TO BE NOTICED

Kara Lynn Klima
(See above for address)
TERMINATED: 03/12/2020

Date Filed	#	Docket Text
09/12/2025	274	ORDER that, pursuant to the parties' stipulation (Doc. 273), this matter is dismissed with prejudice, each party to bear their own costs and attorneys' fees. Signed by Senior Judge Douglas L Rayes on 9/12/25. (EJA) (Entered: 09/12/2025)

09/12/2025	273	STIPULATION of Dismissal by Jennifer Power. (Attachments: # 1 Proposed Order Order to Dismiss)(Findling, Anne) (Entered: 09/12/2025)
07/16/2025	272	ORDER The Court having reviewed the parties' Joint Report re: Status of Settlement (Doc. 271), and good cause appearing, IT IS ORDERED that the parties' request to continue the stay is GRANTED. IT IS FURTHER ORDERED the parties shall file a Second Joint Report concerning the status of the settlement on or before September 19, 2025 . Signed by Senior Judge Douglas L Rayes on 7/16/2025. (SST) (Entered: 07/16/2025)
07/16/2025	271	JOINT STATUS REPORT of <i>Settlement</i> by Jennifer Power. (Attachments: # 1 Proposed Order)(Findling, Anne) (Entered: 07/16/2025)
04/22/2025	270	ORDER that the parties' motion to stay is GRANTED. This matter is stayed to allow the parties to obtain approval of the settlement by the Arizona Joint Legislative Budget Committee ("JLBC"). ORDERED that the final pretrial conference scheduled for April 28 and the trial scheduled for May 6, 2025, are vacated, and all pending motions are denied as moot. FURTHER ORDERED the parties shall file a notice to the Court concerning the status of the JLBC's approval of the settlement no later than July 21, 2025. Signed by Senior Judge Douglas L Rayes on 4/22/25. (EJA) (Entered: 04/22/2025)
04/22/2025	269	NOTICE of Settlement and Motion to Stay by Jennifer Power. (Attachments: # 1 Proposed Order Proposed Order)(Findling, Anne) (Entered: 04/22/2025)
04/21/2025	268	ORDER: IT IS ORDERED that the parties review the attached list of jurors the Court intends to strike and be prepared to discuss at the final pretrial conference set for April 28, 2025. Signed by Senior Judge Douglas L Rayes on 4/21/2025. (Attachments: # 1 Juror Questionnaire, # 2 Intended Strikes)(MMO) (Entered: 04/21/2025)
04/18/2025	267	NOTICE of Filing - Proposed Pretrial Order filed by Jennifer Power . (Attachments: # 1 Proposed Order Joint Proposed Final Pretrial Form of Order)(Findling, Anne) (Entered: 04/18/2025)
04/18/2025	266	Witness List by Jennifer Power. (Findling, Anne) (Entered: 04/18/2025)
04/18/2025	265	Joint Proposed Jury Instructions by Jennifer Power. (Findling, Anne) (Entered: 04/18/2025)
04/18/2025	264	Joint Proposed Voir Dire by Jennifer Power. (Findling, Anne) (Entered: 04/18/2025)
04/18/2025	263	Proposed Statement of the Case by Jennifer Power. (Findling, Anne) (Entered: 04/18/2025)
04/18/2025	262	First Proposed Verdict Form by Jennifer Power. (Attachments: # 1 Forms Form of Verdict)(Findling, Anne) (Entered: 04/18/2025)
04/18/2025	261	Proposed Verdict Form by Steven Gallardo. (Attachments: # 1 Forms Proposed Verdict Form)(Fitz-Maurice, Caitlin) (Entered: 04/18/2025)
04/10/2025	260	First MOTION to Lift Confidentiality Designations by Jennifer Power. (Attachments: # 1 Proposed Order Lift Confidentiality)(Findling, Anne) (Entered: 04/10/2025)
04/08/2025	259	NOTICE of Attorney Substitution by Nathan Metzger. (Metzger, Nathan) (Entered: 04/08/2025)
04/08/2025	258	Joinder re: 254 Response to Motion in <i>Limine No. 4</i> by Defendants Dale A King, Antonio R Tuccino. (Metzger, Nathan) (Entered: 04/08/2025)
04/08/2025	257	Joinder re: 253 Response to Motion in <i>Limine No. 3</i> by Defendants Dale A King, Antonio R Tuccino. (Metzger, Nathan) (Entered: 04/08/2025)

04/08/2025	256	Joinder re: 252 Response to Motion <i>in Limine No. 2</i> by Defendants Dale A King, Antonio R Tuccino. (Metzger, Nathan) (Entered: 04/08/2025)
04/08/2025	255	Joinder re: 251 Response to Motion <i>in Limine No. 1</i> by Defendants Dale A King, Antonio R Tuccino. (Metzger, Nathan) (Entered: 04/08/2025)
04/08/2025	254	RESPONSE to Motion re: 235 Fourth MOTION in Limine re: Empty Chair Arguments filed by Steven Gallardo. (Fitz-Maurice, Caitlin) (Entered: 04/08/2025)
04/08/2025	253	RESPONSE to Motion re: 234 Third MOTION in Limine re: Financial Circumstances of Defendants filed by Steven Gallardo. (Fitz-Maurice, Caitlin) (Entered: 04/08/2025)
04/08/2025	252	RESPONSE to Motion re: 233 Second MOTION in Limine re: Standard of Care Evidence filed by Steven Gallardo. (Fitz-Maurice, Caitlin) (Entered: 04/08/2025)
04/08/2025	251	RESPONSE to Motion re: 232 First MOTION in Limine re: Time Cause and Manner of Death filed by Steven Gallardo. (Attachments: # 1 Exhibit Exhibits A-F)(Fitz-Maurice, Caitlin) (Entered: 04/08/2025)
04/08/2025	250	RESPONSE to Motion re: 235 Fourth MOTION in Limine re: Empty Chair Arguments filed by Dale A King, Antonio R Tuccino. (Metzger, Nathan) (Entered: 04/08/2025)
04/08/2025	249	RESPONSE to Motion re: 233 Second MOTION in Limine re: Standard of Care Evidence filed by Dale A King, Antonio R Tuccino. (Attachments: # 1 Exhibit 1) (Metzger, Nathan) (Entered: 04/08/2025)
04/08/2025	248	RESPONSE to Motion re: 232 First MOTION in Limine re: Time Cause and Manner of Death filed by Dale A King, Antonio R Tuccino. (Attachments: # 1 Exhibit 1, # 2 Exhibit 2)(Metzger, Nathan) (Entered: 04/08/2025)
04/08/2025	247	RESPONSE to Motion re: 237 MOTION in Limine re: Defendant Gallardos Motion in Limine to Preclude and Standard of Care Evidence filed by Jennifer Power. (Findling, Anne) (Entered: 04/08/2025)
04/08/2025	246	RESPONSE to Motion re: 238 MOTION in Limine re: Defendant Gallardo's Motion in Limine to Preclude Evidence of Remedial Measures Including Investigations filed by Jennifer Power. (Findling, Anne) (Entered: 04/08/2025)
04/08/2025	245	RESPONSE to Motion re: 236 MOTION in Limine re: Defendant Gallardos Motion in Limine to Preclude Evidence or From Eliciting Certain Expert Testimony at Trial filed by Jennifer Power. (Findling, Anne) (Entered: 04/08/2025)
04/08/2025	244	RESPONSE to Motion re: 231 MOTION in Limine re: Preclude any Expert Testimony from Lay Witness Michael Ballantyne filed by Jennifer Power. (Findling, Anne) (Entered: 04/08/2025)
04/01/2025	243	Joinder re: 238 MOTION in Limine re: Defendant Gallardo's Motion in Limine to Preclude Evidence of Remedial Measures Including Investigations by Defendants Dale A King, Antonio R Tuccino. (Metzger, Nathan) (Entered: 04/01/2025)
04/01/2025	242	Joinder re: 236 MOTION in Limine re: Defendant Gallardos Motion in Limine to Preclude Evidence or From Eliciting Certain Expert Testimony at Trial by Defendants Dale A King, Antonio R Tuccino. (Metzger, Nathan) (Entered: 04/01/2025)
04/01/2025	241	Joinder re: 237 MOTION in Limine re: Defendant Gallardos Motion in Limine to Preclude and Standard of Care Evidence by Defendants Dale A King, Antonio R Tuccino. (Metzger, Nathan) (Entered: 04/01/2025)
03/31/2025	240	NOTICE TO FILER OF DEFICIENCY re: 230 Notice re: Intent to Serve Subpoena filed by Jennifer Power. Document not in compliance with LRCiv 5.5(g) - Documents signed

		by an attorney shall be filed using that attorney's ECF log-in and password and shall not be filed using a log-in and password belonging to another attorney. Document(s) signed by attorney Anne E Findling but submitted using the log-in and password belonging to attorney Joel Robbins. <i>No further action is required.</i> This is a TEXT ENTRY ONLY. There is no PDF document associated with this entry. (EJA) (Entered: 03/31/2025)
03/28/2025	239	Joinder re: 231 MOTION in Limine re: Preclude any Expert Testimony from Lay Witness Michael Ballantyne by Defendant Steven Gallardo. (Fitz-Maurice, Caitlin) (Entered: 03/28/2025)
03/28/2025	238	MOTION in Limine re: Defendant Gallardo's Motion in Limine to Preclude Evidence of Remedial Measures Including Investigations by Steven Gallardo. (Attachments: # 1 Proposed Order)(Fitz-Maurice, Caitlin) (Entered: 03/28/2025)
03/28/2025	237	MOTION in Limine re: Defendant Gallardos Motion in Limine to Preclude and Standard of Care Evidence by Steven Gallardo. (Attachments: # 1 Proposed Order)(Fitz-Maurice, Caitlin) (Entered: 03/28/2025)
03/28/2025	236	MOTION in Limine re: Defendant Gallardos Motion in Limine to Preclude Evidence or From Eliciting Certain Expert Testimony at Trial by Steven Gallardo. (Attachments: # 1 Exhibit Exhibits A-D, # 2 Proposed Order)(Fitz-Maurice, Caitlin) (Entered: 03/28/2025)
03/28/2025	235	Fourth MOTION in Limine re: Empty Chair Arguments by Jennifer Power. (Attachments: # 1 Proposed Order Plaintiff's MIL 4)(Findling, Anne) (Entered: 03/28/2025)
03/28/2025	234	Third MOTION in Limine re: Financial Circumstances of Defendants by Jennifer Power. (Attachments: # 1 Proposed Order Plaintiff's MIL 3)(Findling, Anne) (Entered: 03/28/2025)
03/28/2025	233	Second MOTION in Limine re: Standard of Care Evidence by Jennifer Power. (Attachments: # 1 Proposed Order Plaintiff's MIL 2)(Findling, Anne) (Entered: 03/28/2025)
03/28/2025	232	First MOTION in Limine re: Time Cause and Manner of Death by Jennifer Power. (Attachments: # 1 Exhibit Exhibit A, # 2 Proposed Order Plaintiff's MIL 1)(Findling, Anne) (Entered: 03/28/2025)
03/28/2025	231	MOTION in Limine re: Preclude any Expert Testimony from Lay Witness Michael Ballantyne by Dale A King, Antonio R Tuccino. (Attachments: # 1 Proposed Order) (Metzger, Nathan) (Entered: 03/28/2025)
03/28/2025	230	NOTICE re: Intent to Serve Subpoena by Jennifer Power . (Attachments: # 1 Exhibit Exhibit 1 - Trial Subpoena)(Robbins, Joel) (Entered: 03/28/2025)
03/21/2025	229	NOTICE re: Proposed Juror Questionnaire by Jennifer Power . (Channell, Lauren) (Entered: 03/21/2025)
03/13/2025	228	ORDER: IT IS ORDERED the parties shall review the attached Juror Questionnaire and submit to the Court proposed case specific questions, no more than 3 per side, and a joint proposed statement of the case no later than 3/21/2025 for the Court's consideration. Ordered by Senior Judge Douglas L Rayes on 3/13/2025. (MMO) (Entered: 03/13/2025)
02/06/2025	227	MINUTE ENTRY for proceedings held before Senior Judge Douglas L Rayes: Telephone Conference held on 2/6/2025. Discussion held as to the currently scheduled trial dates in this matter. Counsel for Plaintiffs orally moves to dismiss Defendants Corizon Health Incorporated, Corizon Incorporated, Corizon LLC, Correct Care Solutions LLC and GEO Group Incorporated. The motion is GRANTED. The Final Pretrial Conference set for 4/28/2025 at 9:30 AM and the Jury Trial set for 5/6/2025 at 9:00 AM are AFFIRMED.

		APPEARANCES: Telephonic appearances by Lauren Channell, Anne Findling and Jesse Showalter for Plaintiff. Telephonic appearances by Caitlin Fitz-Maurice for Defendants Gallardo and State of Arizona and by Nathan Metzger for Defendants King and Tuccino. (Court Reporter Jennifer Pancratz.) Hearing held 3:01 PM to 3:13 PM. This is a TEXT ENTRY ONLY. There is no PDF document associated with this entry. (SST) (Entered: 02/07/2025)
02/04/2025	226	NOTICE of Appearance by Caitlin Bartness Fitz-Maurice on behalf of Steven Gallardo, Arizona, State of. (Fitz-Maurice, Caitlin) (Entered: 02/04/2025)
02/04/2025	225	MINUTE ORDER: Telephone Conference re: trial schedule set for 2/6/2025 at 03:00 PM before Senior Judge Douglas L Rayes. The parties will be provided with call-in information via separate email. This is a TEXT ENTRY ONLY. There is no PDF document associated with this entry. (MMO) (Entered: 02/04/2025)
01/30/2025	224	NOTICE OF ATTORNEY'S CHANGE OF ADDRESS/EMAIL/FIRM NAME by Nathan Metzger. (Metzger, Nathan) (Entered: 01/30/2025)
11/07/2024	223	ORDER SETTING FINAL PRETRIAL CONFERENCE: Motions in Limine due by 3/28/2025. Proposed Pretrial Order due by 4/18/2025. Final Pretrial Conference set for 4/28/2025 at 9:30 AM in Courtroom 606, 401 West Washington Street, Phoenix, AZ 85003. See Order for complete details. Signed by Senior Judge Douglas L Rayes on 11/7/2024. (KJ) (Entered: 11/07/2024)
11/05/2024	222	MINUTE ENTRY for proceedings held before Senior Judge Douglas L Rayes: Telephonic Trial Scheduling Conference held on 11/5/2024. A firm Jury Trial is set for 5/6/2025 at 09:00 AM. Final Pretrial Conference set for 4/28/2025 at 09:30 AM. APPEARANCES: Telephonic appearances by Lauren Channell, Anne Findling, and Jesse Showalter for Plaintiff. Telephonic appearances by Daxton Watson and Perry Tazzaza for Defendants. Caitlin Fitz-Maurice present. (Court Reporter Jennifer Pancratz.) Hearing held 9:41 AM to 9:54 AM. This is a TEXT ENTRY ONLY. There is no PDF document associated with this entry. (NSH) *Modified to reflect that Caitlin Fitz-Maurice was present on 11/5/2024 (NSH). (Entered: 11/05/2024)
10/24/2024	221	NOTICE of Appearance by Jesse Morgan Showalter on behalf of Jennifer Power. (Showalter, Jesse) (Entered: 10/24/2024)

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