

PROVIDED TO PALACHEE
CORRECTIONAL INSTITUTION

ON 10/15/25
FOR MAILING

JJA

SC

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS

HOUSTON DIVISION

IN RE:

TODD WERMANE THOMAS

Plaintiff

Civil Action No.: 6:23-CV-D1355-ACC-LHP

Bankruptcy Case No.: 23-90086 (CML)

United States Courts
Southern District of Texas
FILED

OCT 23 2025

CHAPTER 11

Nathan Ochener, Clerk of Court

MOTION FOR RECONSIDERATION

1. On September 10th 2025 I received a copy of an official Form 410 "Proof of Claim" from The United States District Court Southern District of Texas P.O. Box 61010 HOUSTON, TX Texas 77208 after I'd requested to be provided with one.
2. On September 16th 2025 I filed my "Proof of Claim" (mail box rule) with the Bankruptcy Court in an attempt to be listed as a secured PI/WD claimant and move my case forward with a settlement from the PI/WD Trust.
3. On October 7th 2025 I received a document/letter from: TEHUM CARE SERVICES SETTLEMENT P.O. Box 89 Wilmington DE 19899 which was a "Disallowance Notice."

PAGE # 1 of 4



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In this "Disallowance Notice" it was stated:
 "Your Trust Claim Fails to meet the following designated threshold eligibility criteria (Threshold Criteria) requirement(s) outlined in Article IV(D) of the TDP:

(☒ Box checked) (1) have timely filed, or have been deemed to have timely filed, a Proof of Claim with the Bankruptcy Court;

4. I am a known creditor and I'm listed as a Party in Exhibit "B" of the Motion to Enjoin that was never provided with any of the following:

- ☒ 1. A copy of the Plan
- ☒ 2. An opt-out Form
- ☒ 3. A Proof of Claim
- ☒ 4. Actual notice of the confirmation Hearing

-And- Therefore I was never given an opportunity to choose IF I desired to "opt-out" of the plan OR File a Timely Proof of Claim and be listed as a secured PI/WD claimant.

I'm not understanding how TEHUM/YesCare is seeking to enjoin me as a Known Creditor listed as a Party in Exhibit "B" of the motion to enjoin; Now here I am willfully requesting to be add to the list as a secured PI/WD Claimant and my request is being "Disallowed"

THEREFORE I Respectfully request for TEHUM/YesCare to Reconsider the Disallowance of my Untimely Filed "Proof of Claim" in Carefully Consideration of the circumstances surrounding my untimely Filed Proof of Claim. I desire to be listed as a Secured PI/WD claimant and move my case forward with a settlement from the PI/WD Trust...

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document was sent via U.S. mail on this 15th day of October 2025 to the following:

1. The United States Bankruptcy Court
Courtroom 401
Southern District of Texas
515 Rusk Avenue
Houston, Tx 77002
2. TEHUM CARE SERVICES SETTLEMENT
P.O. BOX 89
Wilmington DE. 19899

3. Bowman and Brooke LLP
5850 Granite Parkway
suite 900
Plano, Tx 75024

Respectfully Submitted
/s/ Todd Hermene Thomas
Todd Hermene Thomas

Under Penalty of Perjury and Pursuant
to 28 U.S.C. § 1746 I swear that
the foregoing facts mentioned within
this: MOTION FOR RECONSIDERATION
are true and correct.

Todd J. Thomas
Todd J. Thomas

Date: 10/15/2025

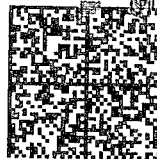
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United States Courts
Southern District of Texas

Southern District of Texas

FILED

OCT 23 2025

Mathan Ochsner, Clerk of Court

The United States Bankruptcy Court
Courtroom 401 / Southern District of Texas
515 Rusk Avenue

Courtroom 401 / Southern District of Texas

515 Bush Avenue

Houston, Tx 77002

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