

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

In re:

TEHUM CARE SERVICES, INC.,<sup>1</sup>

Debtor.

Chapter 11

Case No. 23-90086 (CML)

Related Dkt. Nos. 1740 & 1741

**NOTICE OF HEARING TO CONSIDER JOINT MOTION OF THE  
TORT CLAIMANTS' COMMITTEE, OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS, AND DEBTOR FOR ENTRY OF ORDER  
(I) APPROVING DISCLOSURE STATEMENT AND FORM AND  
MANNER OF NOTICE OF HEARING THEREON, (II) ESTABLISHING  
SOLICITATION PROCEDURES, (III) APPROVING FORM  
AND MANNER OF NOTICE TO CLAIM HOLDERS (IV) APPROVING  
FORM OF BALLOTS, (V) APPROVING FORM, MANNER, AND SCOPE OF  
CONFIRMATION NOTICES, (VI) ESTABLISHING CERTAIN DEADLINES  
IN CONNECTION WITH APPROVAL OF DISCLOSURE STATEMENT  
AND CONFIRMATION OF PLAN, AND (VII) GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE THAT on October 2, 2024, the Official Committee of Tort Claimants appointed in the Debtor's Chapter 11 Case (the "**Tort Claimants' Committee**"), the Official Committee of Unsecured Creditors appointed in the Debtor's Chapter 11 Case (the "**Unsecured Creditors' Committee**"), and Tehum Care Services, Inc., the above-captioned debtor (the "**Debtor**" and, together with the Tort Claimants' Committee and the Unsecured Creditors' Committee, the "**Plan Proponents**") filed:

- the *Joint Chapter 11 Plan of the Tort Claimants' Committee, Official Committee of Unsecured Creditors, and Debtor* [Docket No. 1739] (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the "**Plan**");
- the *Disclosure Statement for the Joint Chapter 11 Plan of the Tort Claimants' Committee, Official Committee of Unsecured Creditors, and Debtor* [Docket No. 1740] (together with all schedules and exhibits thereto, and as may be modified, amended, or supplemented from time to time, the "**Disclosure Statement**"); and
- the *Joint Motion of the Tort Claimants' Committee, Official Committee of Unsecured Creditors, and Debtor for Entry of Order (I) Approving Disclosure*

<sup>1</sup> 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.



*Statement and Form and Manner of Notice of Hearing Thereon, (II) Establishing Solicitation Procedures, (III) Approving Form and Manner of Notice to Claim Holders (IV) Approving Form of Ballots, (V) Approving Form, Manner, and Scope of Confirmation Notices, (VI) Establishing Certain Deadlines in Connection With Approval of Disclosure Statement and Confirmation of Plan, and (VII) Granting Related Relief* [Docket No. 1741] (the “**Solicitation Procedures Motion**”).

**PLEASE TAKE FURTHER NOTICE THAT:**

1. The United States Bankruptcy Court for the Southern District of Texas (the “**Bankruptcy Court**”) has scheduled a hearing on **Wednesday, November 6, 2024, at 1:00 p.m. (Prevailing Central Time)** (the “**Disclosure Statement Hearing**”) to consider (A) the Solicitation Procedures Motion and whether to, among other things, (B) approve the Disclosure Statement as containing “adequate information” within the meaning ascribed to such term in section 1125 of title 11 of the United States Code.

2. The Disclosure Statement Hearing will be held before the Honorable Christopher M. López, United States Bankruptcy Judge, in the United States Bankruptcy Court for the Southern District of Texas, Houston Division, Courtroom 401, 515 Rusk, Houston, TX 77002. The Disclosure Statement Hearing may be continued from time to time without further notice other than an announcement made in open court or at any continued hearing, or as indicated in any notice of agenda of matters scheduled for hearing filed with the Bankruptcy Court. If the Disclosure Statement Hearing is continued, the Plan Proponents will post provide notice of the new date and time of the Disclosure Statement Hearing and post the same at <https://veritaglobal.net/Tehum>. The Disclosure Statement may be modified, if necessary, in accordance with the Bankruptcy Code, the Bankruptcy Rules, and other applicable law, before, during, or as a result of the Disclosure Statement Hearing, without further notice to creditors or other parties in interest.

3. Copies of the Disclosure Statement, the Plan and Solicitation Procedures are available for review free of charge on the website maintained by the Solicitation Agent, Verita Global, at <https://veritaglobal.net/Tehum>. Copies of the Disclosure Statement and Plan are also available upon request by contacting the Solicitation Agent at [tehuminfo@veritaglobal.com](mailto:tehuminfo@veritaglobal.com) or at (855) 967-0491 (Toll-Free) or +1 (301) 751-2691 (International).

4. Responses and objections, if any, to approval of the Disclosure Statement must: (a) be in writing; (b) state the name and address of the objecting party and the nature of the Claim or Equity Interest held by such party; (c) state with particularity the basis and nature of any objection or response and include, where appropriate, proposed language to be inserted in the Disclosure Statement to resolve any such objection or response; and (d) be filed, together with proof of service, with the Bankruptcy Court **and served so as to be actually received on or before Friday, November 1, 2024 at 5:00 p.m. (Prevailing Central Time)**.

5. IF ANY OBJECTION TO THE DISCLOSURE STATEMENT IS NOT FILED AND SERVED AS PRESCRIBED HEREIN, THE OBJECTING PARTY MAY BE BARRED FROM OBJECTING TO THE ADEQUACY OF THE DISCLOSURE STATEMENT AND MAY NOT BE HEARD AT THE HEARING.

Respectfully submitted this 4th day of October, 2024.

/s/ Eric R. Goodman

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- and -

/s/ Michael W. Zimmerman

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*Counsel to the Debtor and Debtor in  
Possession*

**Certificate of Service**

The undersigned hereby certifies that, on the 4th day of October 2024, he caused a true and correct copy of the foregoing document to be served on all parties who have subscribed for electronic notice via the Court's CM-ECF Notification System.

/s/ Eric R. Goodman

Eric R. Goodman