Docket #0045 Date Filed: 6/19/2023

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

In re:	§	**Chapter 11**
	§	
TEHUM CARE SERVICES, INC.,	§	**Case No. 23-90086**
	§	
Debtor.	§	
	§	
	§	
ANANT KUMAR TRIPATI,	§	**Adv. No. 23-03072**
	§	
v.	§	
	§	
SARA TIRSCHWELL, et al,	§	
	§	
Defendants.	§	

NOTICE OF SPECIAL APPEARANCE AND JOINDER OF WEXFORD HEALTH SOURCES, INC. IN SUPPORT OF ARIZONA DEFENDANTS' MOTION TO SCREEN PLAINTIFF'S PRO SE INMATE ADVERSARY COMPLAINT AND REQUEST FOR AN EXTENSION OF TIME FILE RESPONSIVE PLEADING

Defendant Wexford Health Sources, Inc. ("Wexford") by and through its counsel, hereby files this Notice of Special Appearance and Joinder in Support of Arizona Defendants' Motion to Screen Plaintiff's Pro Se Inmate Adversary Complaint and Request for an Extension of Time to File a Responsive Pleading and respectfully states as follows:

1. Plaintiff Anant Kumar Tripati ("Plaintiff") filed his Verified Adversary Complaint in the U.S. Bankruptcy Court for the Southern District of Texas on May 1, 2023 commencing this action.

2. Wexford received a copy of the Complaint and summons on May 22, 2023.

3. On June 5, 2023, Defendants Struck Love Bojanowski and Acedo, PL, Daniel P. Struck, Michael Gottfried, Betty Ulibarri, and Diane Bohuszewicz ("Arizona Defendants") filed

their Motion to Screen Plaintiff's Pro Se Inmate Adversary Complaint and request for an Extension of Time to File a Responsive Pleading [Doc.25] ("Motion").

4. Plaintiff is a known serial litigant attempting to relitigate long disposed of claims related to his treatment as a prisoner in the custody of the Arizona Department of Corrections ("ADOC").

5. Plaintiff's Complaint asserts claims for (1) Violation of 18 U.S.C. 1962(c); ARS 13-2314.04 and (2) Violation of 18 U.S.C. 1962(d); ARS 13-2314.04 by Conspiracy to Violate 18 USC 1962(c) and ARS 132314.04 against 42 defendants that seeks to revisit his prior litigation that was dismissed by the United States District Court for the Western District of Pennsylvania in Tripati v. Wexford Health Sources, et al., Case No. 20-cv-00427 (W.D.Pa. Feb 14, 2022) and affirmed on appeal by the Third Circuit Court of Appeals. *Tripati v. Wexford Health Sources, Inc.*, 2022 U.S. Dist. Lexis 24617 at *7, 2022 WL 17690156 (3d Cir. Dec. 15, 2022).

6. Therefore, Wexford hereby incorporates and joins in the arguments made in the Motion to request a screening order and an extension of time to respond to the Complaint.

WHEREFORE, Defendant Wexford Health Sources, Inc., respectfully requests that this Honorable Court screen Plaintiff Anant Kumar Tripati's pro se inmate Complaint pursuant to 28 U.S.C. 1915A, extend the time for Wexford to response to the Complaint for thirty (30) days after the Court issues a screening order and such other and further relief as this Court deems proper.

DATED: June 19, 2023

Respectfully submitted,

/s/Michael P. Ridulfo

Michael P. Ridulfo
Texas Bar No. 16902020
SDTX No. 27086
KANE RUSSELL COLEMAN LOGAN PC
5151 San Felipe, Suite 800
Houston, Texas 77056
Tel.: (713) 425-7400
Fax: (713) 425-7700
Email: mridulfo@krcl.com

- and -

Gregory C. Michaels, Esquire
Pennsylvania Bar No. 205948
DICKIE MCCAMEY & CHILCOTE
Two PPG Place, Suite 400
Pittsburgh, Pennsylvania 15222
Tel.: (412) 281-7272
Fax: (888) 811-7144
Email: gmichaels@dmclaw.com

ATTORNEYS FOR WEXFORD HEALTH SOURCES, INC.

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that on June 19, 2023, a true and correct copy of the foregoing Notice of Special Appearance and Joinder in Support of Arizona Defendants' Motion to Screen Plaintiff's Pro Se Inmate Adversary Complaint and Request for an Extension of Time to File a Responsive Pleading was served upon all counsel of record via the Court's ECF and by mailing the same via U.S. Mail, first-class, postage pre-paid to:

ANANT KUMAR TRIPATI
102081
P.O. Box 8909
Yuma, AZ 85349

/s/Michael P. Ridulfo