

Your claim can be filed electronically on KCC's website at <https://epoc.kccllc.net/Tehum>.

**Fill in this information to identify the case:**

Debtor Tehum Care Services, Inc.  
 United States Bankruptcy Court for the Southern District of Texas  
 Case number 23-90086

**Official Form 410  
 Proof of Claim**

04/22

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed.

**Part 1: Identify the Claim**

1. Who is the current creditor? Albert White  
 Name of the current creditor (the person or entity to be paid for this claim)  
 Other names the creditor used with the debtor \_\_\_\_\_

2. Has this claim been acquired from someone else?  No  
 Yes. From whom? \_\_\_\_\_

3. Where should notices and payments to the creditor be sent?  Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent? <u>Albert White c/o Margolis &amp; Cross</u> Name <u>402 W. Liberty St.</u> Number Street <u>Ann Arbor MI 48103</u> City State ZIP Code <u>United States of America</u> Country Contact phone <u>(734) 994-9590</u> Contact email <u>ian@lawinannarbor.com</u>	Where should payments to the creditor be sent? (if different) Name _____ Number Street _____ City State ZIP Code _____ Country _____ Contact phone _____ Contact email _____

Uniform claim identifier for electronic payments in chapter 13 (if you use one): \_\_\_\_\_

4. Does this claim amend one already filed?  No  
 Yes. Claim number on court claims registry (if known) \_\_\_\_\_ Filed on \_\_\_\_\_ MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?  No  
 Yes. Who made the earlier filing? \_\_\_\_\_

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 AUG 14 2023  
 CURTIZMAN CARSON CONSULTANTS



Part 2:

Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor?  No  Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: \_\_\_\_\_

7. How much is the claim? \$ 1,000,000.00 + attorney's fees Does this amount include interest or other charges?  No  Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card. Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c). Limit disclosing information that is entitled to privacy, such as health care information. Personal injury/deliberate indifference/8th Amendment, medical malpractice (See attached Addendum)

9. Is all or part of the claim secured?  No  Yes. The claim is secured by a lien on property. Nature of property:  Real estate: If the claim is secured by the debtor's principal residence, file a Mortgage Proof of Claim Attachment (Official Form 410-A) with this Proof of Claim.  Motor vehicle  Other. Describe: \_\_\_\_\_ Basis for perfection: \_\_\_\_\_ Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.) Value of property: \$ \_\_\_\_\_ Amount of the claim that is secured: \$ \_\_\_\_\_ Amount of the claim that is unsecured: \$ \_\_\_\_\_ (The sum of the secured and unsecured amount should match the amount in line 7.) RECEIVED AUG 14 2023 KURTZMAN CARSON CONSULTANTS Amount necessary to cure any default as of the date of the petition: \$ \_\_\_\_\_ Annual Interest Rate (when case was filed) \_\_\_\_\_ %  Fixed  Variable

10. Is this claim based on a lease?  No  Yes. Amount necessary to cure any default as of the date of the petition, \$ \_\_\_\_\_

11. Is this claim subject to a right of setoff?  No  Yes. Identify the property: \_\_\_\_\_

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

No

Yes. Check all that apply:

Amount entitled to priority

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

\$ \_\_\_\_\_

Up to \$3,350\* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

\$ \_\_\_\_\_

Wages, salaries, or commissions (up to \$15,150\*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

\$ \_\_\_\_\_

Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

\$ \_\_\_\_\_

Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

\$ \_\_\_\_\_

Other. Specify subsection of 11 U.S.C. § 507(a)( ) that applies.

\$ \_\_\_\_\_

\* Amounts are subject to adjustment on 4/01/25 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

Check the appropriate box:

I am the creditor.

I am the creditor's attorney or authorized agent.

I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

I understand that an authorized signature on this Proof of Claim serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this Proof of Claim and have reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 7 27 23  
MM / DD / YYYY

Albert White  
Signature

Print the name of the person who is completing and signing this claim:

Name Albert White  
First name Middle name Last name

Title \_\_\_\_\_

Company \_\_\_\_\_  
Identify the corporate servicer as the company if the authorized agent is a servicer.

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AUG 14 2023

Address 402 W. Liberty St.  
Number Street MI 48103 USA

City State ZIP Code Country  
(734) 994-9590 MI 48103 USA

Contact phone \_\_\_\_\_ Email ian@lawinannarbor.com



# Margolis & Cross

ATTORNEYS AND COUNSELORS AT LAW

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402 W Liberty Street • Ann Arbor, MI 48103 • P: 734 994 9590 • F: 888 320 9382 • LAWAZ.COM

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August 12, 2023

**Via Overnight Mail To:**

Tehum Care Services, Inc.  
c/o KCC  
222 N Pacific Coast Highway, Suite 300  
El Segundo, CA 90245

**RE: Case #23-90086  
In re: Tehum Care Services, Inc  
Proofs of Claim**

Claims and Noticing Agent,

Please find enclosed the original proofs of claim with addendum for the following creditors:

- Tilmon Barnett
- Milan Berry
- Mark Cain
- Jason Green
- Jerome Martin
- Cameron Shevrovich
- Keith Swift
- Cornelius Ware
- Albert White

Respectfully submitted,

Ian T. Cross

**In RE: Tehum Care Services, Inc**  
**Case No. 23-90086 (Bankruptcy S.D.TX)**

**Debtor:** Tehum Care Services, Inc

**Claimant:** Albert White

**Claim Amount:** Not less than \$1,000,000.00

**Basis for Claim:** Personal Injury/Deliberate Indifference 42 U.S.C. § 1983, Medical Malpractice under Michigan state law.

**ADDENDUM TO PROOF OF CLAIM**

Tehum Care Services, Inc. fdba Corizon Health, Inc. and Corizon, LLC (the “Debtor”) filed its voluntary petition for relief under Chapter 11 of Title 11 of the United States Code on February 13, 2023. Demeshio Fuller, (“Creditor”), has right to assert claims against the Debtor for Deliberate Indifference to his serious medical need under 42 U.S.C. § 1983, refusal to provide surgery to reverse claimant’s temporary colostomy.

Creditor has the following claims against Debtor:

1. Compensatory damages of not less than \$1,000,000.00
2. Claimant seeks an award of not less than:
  - a. Court and taxable costs (to be determined upon liquidation);
  - b. Attorneys’ fees (to be determined upon liquidation); and
  - c. Punitive damages to be determined by a jury.

Creditor’s claims total not less than \$1,000,000.00. Creditor’s claims continue to accrue legal fees, and costs. Additional documentation comprising mostly of medical records is voluminous, and available to Debtor and authorized parties upon request.

Nothing contained in this Proof of Claim is a waiver of any rights, claims, or defense of Creditor against the Debtor. All said rights are expressly reserved. Nothing contained in this Proof of Claim is a waiver or any rights against any non-debtor party. Creditor hereby reserves the right to alter, amend, supplement, modify, and/or withdraw this Proof of Claim at any and all times. To the full extent of the law, including *Stern v. Marshall*, 131 S.Ct. 2594 (2011), Creditor demands that any non-core proceedings relating to or arising under this Proof of Claim be tried by a jury in Federal District Court. The submission of this Proof of Claim is subject to, not a waiver or release of, and Creditor hereby reserves:

1. Any lack of venue or jurisdiction by this Court over this case or any adversary action, contested matter, or other proceeding (“Matter”) in this case;
2. Any right to a jury trial in any Matter (this Proof of Claim shall constitute a demand for such jury trial);
3. Any right to de novo review of any non-core Matter;
4. Any right to contest and deny any and all claims, if any, asserted against Creditor;
5. Any right to withdrawal of the reference of this case or any Matter; and
6. Any other rights, claims, actions, defenses and setoff or recoupment.