

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

United States Courts
Southern District of Texas
FILED
DEC 11 2023
Nathan Ochener, Clerk of Court

IN RE:
TEHUM CARE SERVICE, INC. ,
CORIZON HEALTH, INC.
DEBTOR

CHAPTER 11
CASE NO. 23-90086 (CML)
RE: DOCKET NO. 1071
DOCUMENT 1077
*****~~XXXXXXXXXX~~ filed 10/31/23

CEDRIC BELL #248097
PLAINTIFF,
V,
MICHIGAN DEPARTMENT OF
CORRECTIONS, ET AL.,
DEFENDANTS.

CASE NO. 20:2-cv-10193
DISTRICT JUDGE BERNARD A. FRIEDMAN
MAGISTRATE JUDGE ANTHONY P. PATTI

UNITED STATES COURTHOUSE
CLERK OF COURT
515 RUSK AVENUE
HOUSTON TEXAS. 77002

GRAY REED
JASON S. BROOKNER (24053684)
AARON M. KAUFMAN (24050067)
LYDIA A. WEBB (24083758)
AMBER M. CARSON (24075610)
1300 POST OAK BLVD, STE.2000
HOUSTON, TEXAS. 77056

TEHUM CARE SERVICES, INC.
CLAIMS PROCESSING CENTER
c/o KCC
222 N. PACIFIC COAST HIGHWAY, ste.300
EL SEGUNDO, CA. 90245

CEDRIC BELL #248097
CARSON CITY CORR.FAC.
10274 BOYER ROAD
CARSON CITY, MICHIGAN. 48811

MOTION OF OBJECTIONS

UNDER FEDERAL RULES OF CIVIL PROCEDURES RULE (56)(d) WHEN FACTS
ARE UNAVAILABLE TO NON-MOVANT., IF A NON-MOVANT SHOWS BY AFFDAVIT/DECLARATION



IN

THAT, FOR SPECIFIED REASONS, IT CANNOT PRESENT FACTS ESSENTIAL TO JUSTIFY OPPOSITION.

DUE TO CIRCUMSTANCES OUT OF PLAINTIFF BELL CONTROL , DEFENDANT(S) TEHUM CARE SERVICE INC. /CORIZON HEALTH INC. AND MICHIGAN DEPARTMENT OF CORRECTIONS DEFENDANTS/CO-WORKERS HAS USE RETALIATORY METHODS AND MEASURES FROM DENIAL OF LAW LIBRARY ACCESS PROPERLY AND TRANSFERRED TO DISCIPLINARY FACILITIES AND DENIAL OF MEDICAL TREATMENT AND DENIAL OF DOCUMENTS IN THIS BANKRUPTCY MATTER, DEFENDANTS PROVIDE 1 PAGE APRIL 4, 2023 DATED 2/16/23 DOCUMENT 5 ; AND 2 PAGES DOCUMENT 245 DATED 3/26/23, AND ON 10/31/23 I RECEIVED 4 PAGES DOCUMENT 1077 ON NOVEMBER 9, 2023 REGARDING HYBRID HEARING ON DECEMBER 6, 2023.

1. THIS LAWSUIT WAS BROUGHT PURSUANT TO 42 U.S.C. § 1983 FOR VIOLATION OF PLAINTIFF BELL EIGHTH AMENDMENT FIRST AND FOURTEEN MENDMENTS RIGHTS.
2. TEHUM CARE SERVICES INC. / CORIZON HEALTH, INC. / CORIZON, LLC IS/WAS THE SOLE MEDICAL PROVIDER MICHIGAN DEPARTMENT OF CORRECTIONS PROVIDING MEDICAL TREATMENT TO PRISON INMATES WITH THE SAME STAFF / EMPLOYEES.
5. PLAINTIFF BELL FILED THE LAWSUIT FEBRUARY 20, 2020 AS THE DEFENDANTS DENIED MEDICAL TREATMENT FROM 2016 , 2017 , 2018 , 2019, 2020 AS WAS PRESCRIBE BY EXHIBITS, McLAREN MACOMB HOSPITAL ; HENRY FORD HOSPITAL , MOUNT CLEMENS REGIONAL MEDICAL CENTER AND HENRY FORD HOSPITAL (NO) FOLLOW UP MEDICAL TREATMENT WAS EVER PROVIDED AS OUTLINE 28 IN PATIENT SUMMARY DISCHARGE COPIES. (see EXHIBITS ATTACHED (A), (B). AS WELL ORIGINAL COMPLAINT EXHIBITS (H).

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OBJECTION # 1

1. DEFENDANTS TEHUM CARE SERVICES, INC. / CORIZON HEALTH INC. / CORIZON LLC. HAS NEVER PROVIDED PLAINT BODRIC BELL #248097 COPIES OF

Plaintiff
2

COMPLAINT FILED WITHIN THE COURTS, PLAINTIFF BELL HAS BEEN PROVIDED CASE NUMBER 23-90086 DOCUMENT 6 FILED IN TXSB ON 2/16/23 1 PAGE FROM JUDGE CHRISTOPHER LOPEZ UNITED STATES BANKRUPTCY JUDGE.

2. ON MARCH 23, 2023 DEFENDANTS TEHUM CARE SERVICE INC. SENT PLAINTIFF BELL DOCUMENT 246 OFFICIAL FORM 309F1 (FOR CORPORATION OR PARTNERSHIPS) NOTICE OF CHAPTER 11 BANKRUPTCY CASE 2 PAGES., AND OCTOBER 31, 2023 DEFENDANTS DEFENDANTS TEHUM CARE SERVICES, INC. PROVIDED DOCUMENT 1077 4 PAGES RE: 1071,

OBJECTIONS 2

PLAINTIFF BELL HAS NO PLEADINGS IN THE MATTER TO RESPOND TO PROTECT HIS CIVIL RIGHTS AND CASE BEFORE THE COURTS, NO LOCAL COURT RULES OR CIVIL PROCEDURES IN BANKRUPTCY MATTERS.; PLAINTIFF BELL IS NOT VERSE IN LAW AND WOULD HAVE FILED MOTION OF APPOINTMENT OF COUNSEL OR REQUESTED THE COURT TO APPOINT THE LOCAL LAW SCHOOL CLINIC WITHIN THE COURTHOUSE TO AIDE PLAINTIFF BELL WHO IS UNSKILLED IN BANKRUPTCY LAWS AND PROCEDURES., AS THE RETALIATION BY DEFENDANTS TEHUM CARE SERVICES INC. /CORIZON HEALTH INC. / CORIZON LLC. WAS CRUEL AND UNUSUAL PUNISHMENT AND MEDICAL MALPRACTICE VIOLATING THE EIGHTH AMENDMENT OF THE U.S. CONSTITUTION AND AMERICAN DISABILITIES ACT (ADA) TITLE 2 (see PENNSYLVANIA DEP'T OF CORR. vs. YESKEY 524 U.S. 206, 118 S.Ct 1952, 144 L.Ed.2d 215 (1998) (THE AMERICANS DISABILITIES ACT (ADA) (42 U.S.C. §§ 12101-12213) APPLIES TO PRISONERS).; U.S. vs. SODOLBERG, 821 F.2d 59 (1st CIR. 1987).; FERNANDEZ vs. U.S., 941 F.2d 1488 (11 CIR. 1991). ; WHITE vs. NAPOLEAN, 897 F.2d 103 (3rd CIR. 1990) (CONSTITUTIONAL DELIBERATE INDIFFERENCE CAN BE SHOWN BY MEDICAL PROVIDERS' PERSISTENCE IN AN INEFFECTIVE COURSE OF TREATMENT)., see also GREENO vs. CALEY, 414 F.2d 646 (7th CIR. 2005).

OBJECTION #3

PLAINTIFF BELL IS BEING RETALIATED AGAINST BY DEFENDANTS TENUM CARE SERVICES, INC. / HORIZON HEALTH, INC. / HORIZON LLC WHEN THEY DENIED MEDICAL FOLLOW-UP TREATMENT FROM 4 DIFFERENT HOSPITALS ; AS WELL DESTROYED SUMMARY DISCHARGE FROM EACH HOSPITALS CLAIMING THEY NEVER RECEIVE THEM, SWITCH PAIN MEDICATION THAT WAS SENT WITH PLAINTIFF BELL FROM HOSPITALS , DEFENDANTS ORDERED MEDICAL STAFF TO TAKE AWAY MEDICAL SUPPLIES AND BILATERAL METAL BRACES ATTACHED TO BOOTS ORDERED BY DOCTOR RAMESH D. KILARRU MD X JUNE 8, 2015; DOCTOR MARY A. GREINER, DD NOVEMBER 25, 2018 ; AS WELL ORTHOPEDIC SHOES TO ACCOMMODATE BRACE BY DOCTOR BERGERDING, ALSO DOCTORS ANITA M. WARDHA, MD ; DOCTOR ROBERT A. WESTOVER, MD ; DOCTOR FERNANDO FRONTERA, MD DOCTOR MICHAEL R. ENGELSGJERD, MD ; DOCTOR ARBEEHIR RAX FACHINIA, MD., AS THE BARRIER FREE HOUSING ACCESSIBLE WAS TAKEN AWAY, NO PAIN MEDICATION FOR BACK SPINAL ; HEADACHE FROM HEAD INJURY CONCUSSION(S) ALL TAKEN AWAY BECAUSE FILED GRIEVANCES AND SOUGHT REDRESS BY 1983 ., see SMITH vs. CAMPBELL, 250 F.3d 1032 (5th CIR. 2001) (ACTIONABLE CLAIM STATED WHEN PRISONER IS RETALIATED AGAINST FOR EXERCISING HIS/HER CONSTITUTIONAL RIGHTS) ; RHODES vs. ROBINSON, 408 F.3d 559 (9th CIR. 2005) (ALLEGATION OF RETALIATORY ACTION WHEN OFFICIALS WITHHELD AND DESTROYED PROPERTY, THREATENED TRANSFER, AND ASSAULTED PRISONER FOR FILING PRISON GRIEVANCES AND LAWSUIT STATED VIABLE CLAIM, CHALLENGE PRISONER FIRST AMENDMENT RIGHTS, EVEN THOUGH HIS RIGHTS WERE NOT NECESSARILY SILENCED),

OBJECTION #4

DEFENDANTS VIOLATED THE EIGHTH AMENDMENT OF PLAINTIFF BELL THE CRUEL AND UNUSUAL PUNISHMENT DENYING MEDICAL TREATMENT AS PLAINTIFF BELL

SUFFER FOR YEARS WITHOUT TREATMENT AS PRESCRIBE BY 4 DIFFERENT HOSPITAL AND DEFENDANTS MADE PLAINTIFF BELL SUFFER FOR YEARS 2016, 2017, 2018, 2019 2020, 2021, 2022, 2023 UNTIL THE FILED BANKRUPTCY THREE YEARS AFTER LAWSUIT WAS FILED, AND THE MEDICAL CONTRACT WAS LOST TO ANOTHER MEDICAL PROVIDER ~~XX~~ BELL PATH CARE, INC. AS PLAINTIFF BELL STILL UNTREATED AS MEDICAL STAFF/ EMPLOYEES ARE STILL THE SAME.; see ADAMS vs. PEREZ, 336 F.3d ~~XXX 508XXXXXXX~~ (5th CIR. 2003)(DELIBERATE DIFFERENCE STANDARD APPLIES TO PRISONERS' CLAIMS THAT CONDITIONS OF CONFINEMENT AMOUNT TO CRUEL AN UNUSUAL PUNISHMENT).; see KADEN vs. SLYKHVIS, 651 F.3d 966(8th CIR 2011)(SUPERVISOR WHO ACQUIRED ~~XXXX~~ IN THE UNCONSTITUTIONAL CONDUCT OF SUBORDINATES MAY BE LIABLE FOR DELIBERATE INDIFFERENCE).

OBJECTION #5

DEFENDANTS TEHUM SERVICE INC. HORIZON HEALTH INC. , HORIZON LLC. ALL ACTING AS ONE DENIED PLAINTIFF BELL LEGAL DOCUMENTS TO RESPOND TO LEGAL FILINGS AND ACCESS TO THE COURTS DEFENDANTS ATTORNEYS AND BIG LAW LAW FIRMS USING BULLY TACTS AS PLAINTIFF BELL IS A PRISON INMATE WITHOUT ACCESS TO LEGAL REPRESENTATION AND PROPER ACCESS TO LAW LIBRARY TO LITIGATE TO RESPOND TO COURTS IN ANOTHER STATE AND COURT RULES AND BANKRUPTCY LAWS TO PROPERLY RESPOND TO COURT ORDERS AND PROCEEDINGS.; see CHRIESEL vs. PHILLIPS, 169 F.3d 513(5th CIR.1999)(PRISONERS HAVE CONSTITUTIONAL RIGHT TO ACCESS TO THE COURTS; UNDUE DELAY OR SIMILAR OBSTRUCTION MAY IMPUGN THIS RIGHT).; TODLASPRASHAD vs. BUREAU OF PRISON, 286 F.3d 576(D.C. CIR. 2002)(MEANINGFUL ACCESS TO COURTS NECESSARILY INVOLVES THE ABILITY TO FILE LEGAL PAPERS AND THE USE OF ACCESSORIES REQUIRES TO PROSECUTE LEGAL CLAIMS).; LEHN vs. HOLMES, 364 F.3d ~~XXX 862~~ (7th CIR. 2004) ILLINOIS PRISONER WAS DENIED ACCESS TO MARYLAND LEGAL

MATERIALS WHILE FACING CHARGES IN MARYLAND, AND SO STATED A VALID ACCESS-
TO-COURTS CLAIM).; AND TRUJILLO vs. WILLIAMS, 465 F.3d 1210 (10th CIR.
2006)(DENIAL OR DELAY OF ACCESS TO COURTS MUST ACTUALLY HARM OR PREJUDICE
A LEGAL CLAIM TO CONSTITUTE AN ACCESS-TO-COURTS VIOLATION\$.

OBJECTION #6

PLAINTIFF BELL HAS/HAVE ACTUAL INJURY AS EXHIBITS (A) AN (B) HOSPITALS
SUMMARY DISCHARGES AS DEFENDANTS NEVER PROVIDED AN FOLLOW-UP TREATMENT OR
MEDICAL CARE WITHIN THE FACILITY AFTER BEING TRANSFERED TO 15 DIFFERENT
PRISON FACILITIES AS WELL TAMPERING WITH LEGAL MAIL FROM THE COURTS OF
COURT ORDERS AS PAGES ARE MISSING (CHILLINE) PLAINTIFF AND WITHHOLDING
OUTGOING MAIL TO THE COURTS BY CO-WORKERS OF DEFENDANTS AS GRIEVANCES WERE
FILED AND SUBMITTED TO THE COURTS AS EXHIBITS SHOWING ACTUAL ~~XXXX~~ INJURY.,
DELTA FOUNDATION, INC. vs. U.S., 303 F.3d 551 (5th CIR. 2002)(OFFICIALS
MUST NOT DISREGARD EVIDENCE IN ORDER TO REACH A PREFERRED CONCLUSION).

~~NO~~ CONCLUSION #7

DEFENDANTS TENUM CARE SERVICES, INC. CORIZON HEALTH INC. CORIZON LLC.
SHOULD BE HELD LIABLE FOR THE PAIN AND SUFFERING THE HAVE CAUSE ME FOR
NEVER PROVIDING MEDICAL TREATMENT AS OUTLINE IN THE COMPLAINT AND MEDICAL
SUMMARY DISCHARGE FROM THE (FOUR HOSPITALS) IN THE STATE OF MICHIGAN,,
McLAREN COMB HOSPITAL ; HENRY FORD HOSPITAL ; MOUNT CLEMENS REGIONAL
MEDICAL CENTER ; AND HENRY FORD HOSPITAL TO A SERIOUS MEDICAL NEEDS, YET
THEY RETALIATED AND TOOK AWAY MEDICAL AFO METAL BRACES ATTACHED TO BOOTS
AND ORTHOPEDIC FOOTWEAR TO ACCOMMODATE BRACES, SPINAL INJURY UNTREATED,
HEAD INJURY UNTREATED BECAUSE I FILED GRIEVANCES AND THE LAUSUIT SEEKING
REDRESS, AFTER 8 DIFFERENT PRISON DOCTORS PRESCRIBE TREATMENT AND DEFENDANTS

EX

DISREGARDED FACTUAL MEDICAL ISSUES, THE INADEQUATE MEDICARE CARE THE FAILURE TO ADMINISTER AND THE RETALIATORY TREATMENT FOR FILING GRIEVANCES AND LAWSUIT SETION 1985 CLAIM., DEFENDANTS HAD A CONTRACT FOR 189 MILLION DOLLARS MAYBE MORE.

PLAINTIFF CEDRIC BELL HAS BEEN BULLIED BY DEFENDANTS BIG LAW FIRMS SHAFMAN LAW GROUP AND TEXAS GRAY REED LAW FIRM AS I BEEN DENIED LEGAL DOCUMENTS TO DEFEND MYSELF AS A PRISON INMATE WITH PERMANET MEDICAL ISSUES UNTREATED SERIOUS MEDICAL NEEDS TO SPINAL, AND HEAD ISSUES THAT ARE VERY PAINFUL AND ONGOING., I SOUGHT MONETARY DAMAGES , PUNITIVE DAMAGES ,AND NOMENAL DAMAGES \$2,250,000.00 WHEN I FILE MY CLAIM IN FEBURARY 2020 AND NOW 3 YEARS LATER DEFENDANTS FILE BANKRUPTCY AND REFUSED TO SEND ME THE LEGAL DOCUMENTS OR CONTRACT TO SEE WHO IS LIABLE CONSIDERING ALL THE DIFFERENT ADTORS.. ^{MAY} THE COURT ACT IN MY BEHALF TO PROTECT MY RIGHTS AND ALLOW MY OBJECTIONS AND SECURE ANY FUNDS AWARDED TO ME AS I AM A HANDICAP PRISONER WITHOUT AN INCOME AND MEDICAL SUPPLIES., AS I HAVE TO PAY FOR MY OWN.

SINCERELY

CEDRIC BELL #248097
CARSON CITY CORR.FAC.
10274 BOYER ROAD
CARSON CITY, NICHIGAN 48611

CC: FILED.

NOVEMBER 25, 2023

CERTIFICATE OF SERVICE

I, CEDRIC BELL #248097 , HEREBY CERTIFY THAT I HAVE SERVED TO THE BELOW NAMED DEFENDANTS AND U.S. DISTRICT COURT BANKRUPTCY IN THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION AND GRAY REED LAW FIRM NAMED TRUE

AND CORRECT COPIES OF THE FOREGOING DOCUMENT BY FIRST CLASS MAIL BY U.S. POSTAL SERVICES, ON THIS 25 DAY OF NOVEMBER 2023.

CC: Filed

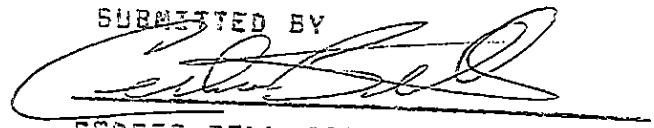
NOVEMBER 25, 2023

UNITED STATES COURTHOUSE
ATTN: CLERK OF COURT
UNITED STATES BANKRUPTCY COURT
515 RUSK AVENUE
HOUSTON , TEXAS. 7702

GRAY REED LAW FIRM
ATTORNEY S. BROOKNER (24033684)
ATTORNEY ANGER W. CARSON (24075610)
1300 POST OAK BLVD, STE. 2000
HOUSTON , TEXAS .77056

TEKUM CARE SERVICES, INC.,
CORIZON HEALTH INC.,
CORIZON LLC.
CLAIMS PROCESSING CENTER
c/o KCC
222 N. PACIFIC COAST HIGHWAY , STE. 300
EL SEGUNDO , CA. 90245

SUBMITTED BY



CEDRIC BELL #248097

CEDRIC BELL #248097
CARSON CITY CORR. FAC.
10274 BOYER ROAD
CARSON CITY , MICHIGAN.
48811

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

United States Courts
Southern District of Texas
FILED

DEC 11 2023

IN RE:
TEHUM CARE SERVICE, INC.,
CORIZON HEALTH INC.,
CORIZON LLC.
DEBTOR

CHAPTER 11 Nathan Ochsner, Clerk of Court
CASE NO. 23-90086 (CML)
RE: DOCKET NO. 1071
DOCUMENT 1077 filed 10/31/23

CEDRIC BELL #248097,
PLAINTIFF,
VS.
TEHUM CARE SERVICES, INC., ET AL,
DEFENDANTS.

CASE NO. 2:20-cv-10193
DISTRICT JUDGE BERNARD A. FRIEDMAN
MAGISTRATE JUDGE ANTHONY P. PATTI

AFFIDAVIT / DECLARATION

AFFIDAVIT / DECLARATION OF [CEDRIC MARK EARSKIN BELL]

I, [CEDRIC MARK EARSKIN BELL], BEING DULY SWORN ACCORDING TO
LAW DEPOSE AND SAY THAT I AM THE PLAINTIFF IN THIS ABOVE MATTER ENTITLED
PROCEEDING.

I AM BEING HELD AT CARSON CITY CORRECTIONAL FACILITY IN CARSON CITY,
MICHIGAN., 10274 BOYER ROAD, CARSON CITY, MICH.48811 .,

1. ON NOVEMBER 9, 2023 I X RECEIVED THROUGH THE MAIL DOCUMENT
1077 4 PAGES NOTICE OF FILING DISCLOSURE STATEMENT SECOND AMENDED
DISCLOSURE STATEMENT REGARDING DEBTOR AND OFFICIALS COMMITTEE OF UNSECURED

CREDITORS; SECOND AMENDED JOINT CHAPTER 11 PLAN [DOCKET NO. 1071](the DISCLOSURE STATEMENT).

A HYBRID HEARING WILL BE HELD DECEMBER 6, 2023 AT 1:00 PM CENTRAL TIME IN FRONT OF HON. CHRISTOPHER M. LOPEZ.

2. ON APRIL 4, 2023 I RECEIVED FROM TEHUM CARE SERVICE INC., CORIZON HEALTH INC. , CORIZON LLC. DEFENDANTS [DOCUMENT 245 DATED 3/23/23 2 PAGES AND DOCUMENT 6 DATED 2/16/23.

THESE ARE THE ONLY LEGAL DOCUMENTS I EVER RECEIVED IN THE CASE MATTER., A TOTAL OF 1077 PAGES FILED IN THE COURTS IN THIS PROCEEDING YET I HAVE PROVIDED ONLY 7 PAGES , AS A PARTY IN THIS CIVIL LAWSUIT BY DEFENDANTS.

3. PLAINTIFF BELL DO NOT HAVE ACCESS TO LOCAL COURT RULES IN IN TEXAS, HOUSTON OR BANKRUPTCY LAWS AND RULE AND CASES TO CITE TO FILE MOTIONS, TO START WITH LEIN ON PROPERTY, MOTION FOR APPOINTMENT OF COUNSEL; OR APPOINTMENT OF LAW SCHOOL CLINIC WITHIN THE COURT TO AIDE PLAINTIFF BELL WITH THESE PROCEEDINGS.

4. PLAINTIFF BELL HAS BEEN DENIED ACCESS TO HEARINGS WITH COURT VIA AUDIO/ VIDEO CONNECTION OR TEL-CONFERENCE , AND I WOULD LIKE TO ATTEND ANY AND ALL PROCEEDING AS A PRO SE LITIGATION , PRO SE LEGAL PAPERS , ACCESS TO THE COURTS., AND FILING PROPER DOCUMENTS IN THE PROCEEDING.

5. PLAINTIFF BELL DO NOT HAVE ACCESS TO LEGAL PROCEEDINGS IN COURTS IN EL SEGUNDO , CA OR NONE OF THE BIG LAW FIRMS THAT IS GRAY REED IN TEXAS OR THE LAW FIRM IN KANSAS CITY MO. THATS ACTING ON BEHALF OF TEHUM CARE SERVICES, INC. , CORIZON HEALTH INC. , CORIZON LLC .

6. PLAINTIFF BELL IS/HAS BEEN BULLIED BY THESE BIG LAW FIRMS AND THE INTIMADATION IS VERY REAL, AS WELL THE INVIDIOUS DISCRIMINATION BASED ON RACE., AS THESE DEFENDANTS NO I AM A PERMANENT HANDICAP PRISONER WITHOUT LEGAL COUNSEL AND BEEN DENIED MEDICAL TREATMENT TO A SERIOUS MEDICAL NEED UNDER THEIR CARE., SUFFERING A CONTINUING WRONG FOR YEARS ., AND RETALIATION THATS ONGOING., AS THE VIOLATIONS OF THE AMERICANS DISABILITIES ACT, (ADA) 42 U.S.C. SEC 12132 AND 504 OF THE REHABILITATION ACT OF 1973, 29/U.S.C. SEC. 794(a).

7. I CEDRIC BELL WAS NEVER TREATED BY DOCTOR MAIMOONA HUSAIN,M.D., CORIZON HEALTH INC. / TENUM CARE SERVICE INC. ~~KNREX~~ EMPLOYEE AT (ANYTIME) WHILE AT MADOMB CORRECTIONAL FACILITY FROM 2016, 2017, 2018, 2019., I NEVER RECEIVED FOLLOW-UP MEDICAL TREATMENT, FOR LIVER AND SPINAL AND HEAD CONCUSSION.

8. I CEDRIC BELL WAS NEVER PROVIDED FOLLOW-UP TREATMENT BY PHYSICIAN ASSISTANT MARIANNE MCKISSICK,P.A. CORIZON HEALTH INC. /TENUM CARE SERVICE INC. / CORIZON LLC. EMPLOYEE WHILE AT MADOMB CORRECTIONAL FACILITY FROM 2016, 2017, 2018, 2019 FOR LIVER DAMAGES AND SPINAL DAMAGES , AND HEAD CONCUSSION., I WAS NEVER PROVIDED PAIN MEDICATION OR PAIN MEDICATION THAT WAS PRESCRIBE BY 4 DIFFERENT HOSPITALS OR PAIN MEDICATION THAT WAS PROVIDE BY HOSPITAL ON RETURN TO CORRECTIONAL FACILITY MADOMB CORR. FAC. .

9. I CEDRIC BELL WAS RETALIATED AGAINST BY HEATHER COOPER,H.U.W. CORIZON HEALTH INC., TENUM SERVICE INC. , CORIZON LLC. EMPLOYEE AT MADOMB CORRECTIONAL FACILITY 2016, 2017, 2018,2019 WHEN SHE CANCEL MEDICAL ACCOMMODATION ORDERS FOR BARRIER FREE HOUSING , EVELATOR / RAMP , AFG BILATERAL METAL BRACES ATTACHED TO BOOTS , ~~N&K~~ ORTHOPEDIC PRESCRIPTION ATHLETIC FOOTWEAR. AS SHE STATED I QUOTE FILED A BRIEVANCE ABOUT THAT.

XXXXXXXXX.

10. U.S. MARSHAL SERVICE ORDERED BY U.S. DISTRICT COURT EASTERN DISTRICT OF MICHIGAN TO LOCATE AND SERVE DEFENDANT HEATHER COOPER WHO WAS TERMINATED FROM MICHIGAN DEPARTMENT OF CORRECTIONS MEDICAL HEALTH CARE CONTRACTED BY TEHUM SERVICE, INC. CORIZON HEALTH INC. , CORIZON LLC. AFTER AFTER BEING HELD LIABLE IN A CIVIL LAWSUIT AND LEFT NO FORWARDING ADDRESS AS DEFENDANT DIRECTED COOPER AND OTHER MEDICAL STAFF/EMPLOYEES DEFENDANTS TO DENY MEDICAL TREATMENT AND MEDICAL COMPLAINTS. AS SHE TOLD ME DIRECTLY STOP FILING GRIEVANCES AND YOU JUST MIGHT GET NO MEDICAL SUPPLIES AND TREATMENT.

11. PLAINTIFF BELL HAS POOR EDUCATION ; POOR HEALTH AND PERMMAANT DISABILITIES ; LACK AVAILABLE RESOURCES IN MICHIGAN DEPARTMENT OF CORRECTIONS FACILITIES TO LEGAL MATERIALS ; I WANT TO DEPOSE A NUMEROUS WITNESSESS AS ITS VERY NECESSARY. ; I LACK THE ABILITY TO GATHER EVIDENCE AND INVESTIGATE ; I LACK THE ABILITY TO INVESTIGATE POLICYS AND ACCESS TO DOCUMENTS TO REVIEW AS THEY ARE NOT ACCESSIABLE TO INMATES CREATING DELIBERATE INDIFFERENCE AS WELL SUPERVISORY PRACTICES AND CONTRACTS VIOLATIONS THAT CAUSE INJURIES AND PAIN AND SUFFERING TO A SERIOUS INJURIES.

CONCLUSION

WHEREFORE, PLAINTIFF BELL RESPECTFULLY PRAYS THAT THIS COURT ENTER A ORDERING GRANTING PLAINTIFF BELL NOMINAL DAMAGES , COMPENSATORY DAMAGES ; MONETARY DAMAGES ; PUNITIVE DAMAGES ; THAT EXCEED \$150,000.00 AS THE INADEQUATE MEDICAL CARE AND MEDICAL NEGLECT AND RETALIATION WAS DONE WITH DELIBERATE INDIFFERENCE AND MALICIOUS INTENT OF MALPRACTICEN AS & OUTSIDE HOSPITALS PROVIDED DOCUMENTS THAT WERE DESTROYED BY DEFENDANTS

FROM OUTSIDE HOSPITALS McLAREN MACOMB HOSPITAL ; MOUNT CLEMENS REGIONAL MEDICAL CENTER ; HENRY FORD HOSPITAL AND A DIFFERENT HENRY FORD HOSPITAL AS EACH HOSPITAL PROVIDED PLAINTIFF A COPY OF DOCUMENT THAT WAS RETURN TO PRISON MEDICAL STAFF/EMPLOYEES DEFENDANTS .

PLAINTIFF BELL HAS PROVIDED FACTUAL ISSUES AS DEFENDANTS FAILURE TO TO ACT FOR YEARS. ,AS THE ELEMENTS OF CONTINUING WRONG IS CLEAR AND IF THIS COURT SEE FIT TO AWARD PLAINTIFF DAMAGES MAY THEY BE SECURED.

VERIFICATION

PURSUANT TO 28 U.S.C. § 1746, I CEDRIC BELL DECLARE AND VERIFY UNDER PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE ABOVE INFORMATION IS TRUE AND FACTUAL AND MAILED NOVEMBER 25, 2023 TO THE COURTS AND DEFENDANTS

SCOTT A. MILLER
NOTARY PUBLIC - STATE OF MICHIGAN
COUNTY OF IONIA
My Commission Expires October 2, 2025
Acting in the County of *Westland*

NOTARY

[Signature]

NOTARY

Nov 29 2023

CEDRIC BELL #248097
CARSON CITY CORR.FAC.
10274 BOYER ROAD
CARSON CITY, MICHIGAN 48813

[Signature]

NAME

PROOF OF SERVICE

I I. CEDRIC BELL #248097 HEREBY CERTIFY I HAVE CAUSED TO SERVE THE BELOW NAMED TRUE AND CORRECT THE FOREGOING DOCUMENTS BY U.S. FIRST CLASS MAIL BY U.S. POSTAL SERVICE. THIS NOVEMBER 29, 2023.

UNITED STATES COURTHOUSE
CLERK OF COURT
515 RUSK AVENUE
HOUSTON, TEXAS., 77002

TEHUM CARE SERVICE INC.
CLAIMS PROCESSING CENTER
c/o KCC
222 N. PACIFIC COAST HIGHWAY, ste. 300
EL SEGUNDO, CA. 90245

GRAY REED LAW FIRM
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AARON M. KRUFMAN (24060067)
LYDIA R. WEBB (24083758)
7300 POST OAK BLVD. , STE. 2000
HOUSTON, TEXAS. 77056