

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

In re:  TEHUM CARE SERVICES, INC.  Debtor.	Chapter 11  Case No. 23-90086 (CML)
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**JOINDER OF RODERICK & SOLANGE MACARTHUR JUSTICE  
CENTER, SOUTHERN CENTER FOR HUMAN RIGHTS, AND WORTH  
RISES TO AMENDED BRIEF OF *AMICI CURIAE* SUPPORTING THE  
TORT CLAIMANTS COMMITTEE'S MOTION TO DISMISS**

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## **CORPORATE DISCLOSURE STATEMENT**

*Amici* Roderick & Solange MacArthur Justice Center, Southern Center for Human Rights, and Worth Rises are nonprofit organizations. None have a parent company, and thus no publicly held company has 10% or greater ownership interest in any of the organizations.

## INTRODUCTION<sup>1</sup>

*Amici* Roderick & Solange MacArthur Justice Center, Southern Center for Human Rights, and Worth Rises submit this joinder to the *Amended Brief of Amici Curiae Supporting the Tort Claimants Committee’s Motion To Dismiss* (Doc. 1398). As discussed in that brief, dismissing this case is consistent with both the most basic notions of fairness and public policy favoring the resolution of tort claims through the civil justice system.

## INTEREST OF *AMICI*

The **Roderick & Solange MacArthur Justice Center** (“MJC”) is a not-for-profit organization founded by the family of J. Roderick MacArthur to advocate for civil rights and a fair and humane criminal legal system. As part of this mission, MJC represents incarcerated and formerly incarcerated individuals in cases concerning medical care, conditions of confinement, and access to courts. MJC has served as merits counsel, *amicus* counsel, or *amicus curiae* in numerous cases around the country related to these issues, in both state and federal courts. As such, MJC has both expertise and interest in ensuring that people incarcerated in prisons and jails have sufficient due process protections in bankruptcy court proceedings.

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<sup>1</sup> No party’s counsel authored this joinder in whole or in part, no party or party’s counsel contributed money intended to fund this brief, and no person other than *amici*, their members, and their counsel contributed money to fund this brief.

The **Southern Center for Human Rights** (“SCHR”) is a nonprofit law firm dedicated to advancing equality, dignity, and justice for people impacted by the criminal legal system. Through litigation and advocacy, SCHR has worked for over 45 years to defend the civil and human rights of incarcerated people, ensure humane conditions of confinement in jails and prisons, and end degrading law enforcement practices. In light of its experience, SCHR has a unique perspective on the issues raised in this case, including the due process rights of people in prisons and jails, and an interest in ensuring that those rights are protected in any context, including bankruptcy court.

**Worth Rises** is a national non-profit advocacy organization dedicated to dismantling the prison industry and ending the exploitation of those it touches. The organization is a leading expert on the prison industry and the ways it exploits and harms incarcerated people, their families, and our communities at large. It studies, documents, and organizes against the commercialization of the U.S. carceral system, including the entities that profit from incarceration and related industries. The organization also regularly engages with impacted communities and aims to ensure incarcerated people receive necessary redress when they have received substandard medical care.

## CONCLUSION

*Amici* Roderick & Solange MacArthur Justice Center, Southern Center for Human Rights, and Worth Rises support the arguments made by other *amici* (Doc. 1398) and similarly urge the Court to dismiss this case.

Dated: February 29, 2024

Submitted,

/s/ Jaqueline Aranda Osorno  
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### **Certificate of Service**

I hereby certify that a true and correct copy of the foregoing Joinder was served on February 29, 2024, via this Court's electronic case filing (ECF) system on all parties receiving ECF notices in this case.

/s/ Jaqueline Aranda Osorno  
Jaqueline Aranda Osorno