

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

United States Courts  
Southern District of Texas  
FILED

MAY 03 2024

Nathaniel Ochsenr, Clerk of Court

In re: Tehume Care Services, Inc.  
Debtor

Case No. 23-90086-CLM  
Chapter 11

TYRONE-ANTHONY: BELL'S MOTION FOR EX PARTE TEMPORARY RESTRAINING ORDER  
AND PRELIMINARY INJUNCTIVE RELIEF

Relief Sought

Tyrone-Anthony: Bell, party-in-interest, unsecured party creditor, moves this Court to issue an injunctive relief Order pursuant to Fed.R.Bank.P. 7065; Fed.R.Civ.P. 65 for the following:

Grounds For Relief

- 1.] Tyrone-Anthony: Bell is a named party-in-interest, unsecured creditor, who has a right to be heard, Fed.R.Bank.P 2018(a);
- 2.] Movant has been unable to participate in any part of the bankruptcy proceedings;
- 3.] Movant has been unable to obtain any transcripts from PACER.
- 4.] Movant has a statutory right to access to broadband internet service under the ACCESS BROADBAND ACT 47 USC § 1305-1723.
- 5.] The Court is bound to enforce a statute as it is written. West Virginia v EPA 142 Sct 2586, 2607 (2022).
- 6.] The ACCESS BROADBAND ACT in section 1306 reads:

"The term 'connected device' means a laptop..."

"Eligible equipment. The term 'eligible equipment' means

- (A) a Wi-Fi hotspot;
- (B) a modem;
- (C) a router;
- (D) a device that combines a modem and router;
- (E) a connected device; or
- (F) any other equipment used to provide access to broadband internet access service."



7.] The ACCESS BROADBAND ACT in section 1721 reads:

"The term 'adoption of broadband' means the process by which an individual obtains daily access to the internet --

(1)(C) on a --

- (i) personal device; and
- (ii) secure and convenient network.

(8) The term 'covered populations' means --

(C) incarcerated individuals...

(10) The term 'digital equity' means the condition in which individuals .. have information technology capacity that is needed for full participation in the society and economy of the United States.

(11) The term 'digital inclusion'--

(A) means the activities that are necessary to ensure that all individuals in the United States have access to, and use of, affordable information and communication technologies, such as --

- (i) reliable fixed and wireless broadband internet services.
- (ii) internet-enable device that meet the needs of the user; and
- (iii) applications and online content designed to enable and encourage self-sufficiency, participation, and collaboration..."

8.] Movant ask for an injunctive relief to allow him to purchase, possess and use:

- a. laptop;
- b. Wi-Fi hotspot;
- c. plugin Wi-Fi booster;
- d. thumb drive;
- e. portable hand held document scanner;
- f. multiple plug surge protector;
- g. padded laptop bag/carrying case
- h. headphone amplifier (Movant is hearing impaired)
- i. Bluetoch headphones;
- j. access to broadband internet services.
- k. access to PACER;
- m. laptop cooling pad

9.] Movant contends that without this injunctive relief that he would be denied access to the courts, Lewis v Casey 518 US 343, 384 (1997)

#### Conclusion

The statute uses plain and unambiguous language which must be enforced. West Virginia, Id.

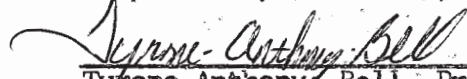
Prays For Relief

That the Court issues an Order which allows Movant and his family to order items 8 (a-m) from Amazon, Walkenhort's and Walmart which are approved vendors of MDOC, so that Movant can access PACER, e-file, and participate in proceedings where Movant can exercise his right to be heard.

VERIFICATION

Under Fed. R. Civ. P. 11, by signing below, I verify (certify, state) to the best of my knowledge, information, and belief that this document: (1) is not being presented for an improper purpose, such as harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery, and (4) the document otherwise complies with the requirement of Rule 11. Under the penalty of perjury 28 USC § 1746.

Respectfully Submitted,

  
Tyrone-Anthony Bell, Pro Se  
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Date: 4/26 2024

Mr. Tyrone-Anthony: Bell  
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Judge Christopher Lopez  
United States Bankruptcy Court  
Southern District of Texas  
Houston Division  
515 Rusk Ave.  
Houston, Texas 77062

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Nathan Ochisner, Clerk of Court

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