

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

United States Courts
Southern District of Texas
FILED

MAY 13 2024

Nathan Ochsner, Clerk of Court

IATONDA PHUPATRIK TAYLOR,

Claimant-Creditor,

v.

TEHUM SERVICES, INC.,

Debtor-Respondent.

Case No: 23-90086

HON. CHRISTOPHER LOPEZ

CHAPTER 11

ORAL ARGUMENT REQUESTED
Attached Motion

>>In Pro Se (Self)

Mr. Iatonda P. Taylor
no. 225263
Kinross Correctional Facility
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Kincheloe, MI 49788

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Tehum Care Services, Inc.
Claims Processing Center
c/o KCC
222 H. Pacific Coast Hwy.
Suite #300
El Segundo, CA 90245

CLAIMANT'S MOTION FOR ORDER UPON DEBTOR'S CONTRACTUAL-HOLDING MI. DEPT. OF CORR.
AND KINROSS CORR. FAC. MAILROOM(S) TO SHOW CAUSE WHY, AN EMERGENCY
INJUNCTIVE ORDER SHOULD NOT BE ISSUED FOR INTERRUPTING OR IMPEDING
OR INTERFERING WITH THE PASSAGE OF LEGAL MAILINGS IN THE CASE

The Claimant, Iatonda Phupatrik Taylor, in pro se (self), moves by requests, pursuant to Fed. Rules of Civ. Proc. (FRCP) 65 et al.; 28 U.S.C.S. § 1334 et al., for the following reasons:

1. The MDOC and KCFs PDs unconstitutionally allow for the holding; of "15 days" of incoming legal mailings, even when FRCPs require, at times: "10 days", or "14 days, or "21 days" to respond actions in the case.

2. Because the MDOC & KCF PDs are (on its face) unconstitutional, this Court should require that the MDOC & KCF show cause, why the

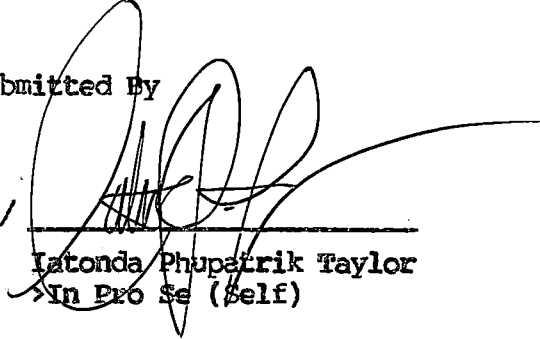


injunctive/restraining order must not be allowed.

For the constitutional reasons, the Claimant PRAYS that Honorable Christopher Lopez order the MDOC & KCF to show cause, why the injunctive/restraining order should not be allowed, or conduct any measure He deem necessary.

Submitted By

/s/



Latonda Phupatrik Taylor
In Pro Se (Self)

May 12, 2024

PROOF OF MAILING

The Claimant did mail one true an exact copy of the Motion(s) and Brief(s) to the Debtor and its Processing Office.

VERIFICATION

I, Latonda Phupatrik Taylor declare under the penalties of perjury that the Motion(s) and Brief(s) Has been examined by me and that its contents are true to the best of my information, knowledge, and belief.

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Wathan Ochsner, Clerk of Court

BRIEF IN SUPPORT OF
CLAIMANT'S MOTION FOR ORDER UPON DEBTOR'S CONTRACTUAL-HOLDING MI. DEPT. OF CORR.
AND KINROSS CORR. FAC. MAILROOM(SO TO SHOW CAUSE WHY, AN EMERGENCY
INJUNCTIVE ORDER SHOULD NOT BE ISSUED FOR INTERRUPTING OR IMPEDING
OR INTERFERING WITH THE PASSAGE OF LEGAL MAILINGS IN THE CASE

Legal Reason

The court may issue a preliminary injunction only on notice to the adverse party. Before or after beginning the hearing on a motion for preliminary injunction, the court may advance the trial on the merits. FRCP 65(a)(1) and (2).

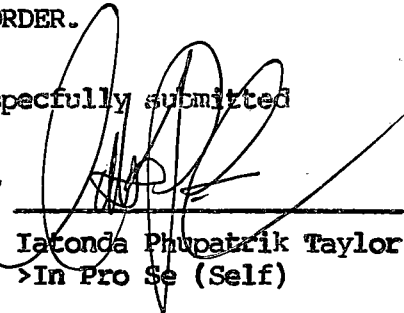
NOW COMES the Claimant, Iatonda Phupatrik Taylor, here to under: Allowing inmate mail to accumulate at a central location until "a sizable bundle has amassed, "then forwarding it, violated the right of access to courts of a prisoner who missed his appeal deadline...". *Gramegna v. Johnson*, 846 F.2d 675, 677 (11th Cir. 1988)

RELIEF REQUESTED

WHEREFORE those reasons in the Motion(s) and Brief(s), the Claimant PRAYS that Honorable Christopher Lopez issue a necessary ORDER.

Respectfully submitted

/s/


Iatonda Phupatrik Taylor
>In Pro Se (Self)

May 12, 2024