

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

SEP 25 2024

In re:

Nathan Ochsner, Clerk of Court

Chapter 11

TEHUM CARE SERVICES, INC.,<sup>1</sup>

Case No. 23-90086 (CML)

Debtor.

**MOTION TO COMPEL PER FEDERAL RULES OF CIVIL  
PROCEDURE RULE 37**

COMES NOW, Plaintiff Creditor Donald Rolle pro se in forma pauperis this creditor asks the Court to force financial records disclosure of all of the corporations Tehum Corp., THC Corp., M2 LoanCo, LLC, YesCare Corp., M2 HoldCo, LLC, Perigrove 1018, LLC, and Geneva Consulting, LLC and ownership listed Yitzchak Lefkowitz a/k/a Isaac Lefkowitz; Sara Ann Tirschwell; Ayodeji Olawale Ladele; Beverly Michelle Rice; Jeffrey Scott King; Jennifer Lynee Finger; and Frank Jeffrey Sholey. Per rule 37 of Rules of Civil Procedure based on statements made by <sup>1</sup>Lefkowitz Doc 010111035702 and his Attorney <sup>2</sup>Audio 1688 @ 32min. If the record shows these corporations and individuals in fact do have enough resources to pay in full all debtors the Court would be not affording the debtors the information required to make an informed accurate choice on what a fair settlement would actually be.

Because of the statements made by <sup>1</sup>Lefkowitz and his <sup>2</sup>attorney that there are enough resources to pay debtors in full this should no longer be secreted away any longer adding to further unnecessary delays!

<sup>1</sup> The last four digits of the Debtor's federal tax identification number is 8853. The Debtor's service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027



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I understand that these creditors gave false, misleading information to the Court about their financial status in the beginning but with repeated statements that there are enough resources to pay all debtors. Why is the Court accepting less than 75% payout to settle this at this point is a mystery when it would be an injustice to the debtors if a 50% payout was at the negotiating table after the statements made on the record about the solvency of the creditors this late of the proceedings! At this point the Court is unbelievably attempting to settle this for less than pennies on the dollar to the debtors and only the appointed attorneys are getting paid at this point and they have not suffered death, loss, pain, vision, been handicapped and even still painful suffering and ongoing financial loss at the hands of these creditors!

Now the delays have been multiplied by this bankruptcy case that by **all definitions is a fraud** actually admitted to by Lefkowitz under oath and just an obvious attempt at even more delays. These debtors have defrauded patients, states and the federal government leaving a wake of death, pain and suffering across the country! I personally suffer every single day currently as I have since October 2018 with the results of these debtors lack of constitutional adequate medical care!

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<sup>1</sup>Document: 010111035702 Date Filed: 04/22/2024 Page: 31

5 Lefkowitz also testified that Tehum has, 6 enough resources to pay all Creditors and that Tehum is not 7 in financial distress.

14 Lefkowitz believed Tehum has all the money to, 15 pay all the claims in full because he thinks these claims are, 16 illegitimate and their lawyer is a crook who just want to, 17 settle and make money.

<sup>2</sup>Audio attachment 1688 @ 32 min.

**WHEREFORE** Plaintiff-Creditor Donald Rolle asks of this Court to take the action appropriate to hold these individuals and corporations responsible for their intentional actions. This creditor begs the Court to order the named corporations and individuals to disclose their total net worth individually or at the minimum combined in writing to the Court and the creditors without delay! This would at the very least reduce any more unnecessary delays Time 13:00 and Date: September, 16<sup>th</sup> 2024.

Signed: 

Donald Rolle #25795

Wyoming Medium Correctional Institute

7076 Rd 55 F

Torrington, Wyoming 82240

**CERTIFICATE OF SERVICE**

I hereby certify that this filing was placed into a U.S. postal box at WMCI or handed to a WDOC prison official to place into a U.S. postal box at WMCI on this Time 13:00 and Date: 13:00 September, 16<sup>th</sup> 2024.

Signed: 

Donald Rolle #25795

Wyoming Medium Correctional Institute

7076 Rd 55 F

Torrington, Wyoming 82240

Donald Rolfe  
#25795 Wmci  
7076 Rd 55 F  
Harrington, WY 82240

United States Courts  
Southern District of Texas  
FILED  
SEP 25 2024

Nathan Ochstreif, Clerk of Court

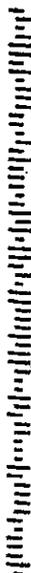
CHEYENNE WY 820  
THIS IS AN UNLICENSED LETTER  
FROM AN INMATE AT THE WYOMING  
MEDIUM CORRECTIONAL INSTITUTION  
FIRST CLASS



United States Bankruptcy Court  
515 Rusk Avenue  
Houston, TX 77002

Legal

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