

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

DEC 01 2025

Nathan Ochsner, Clerk of Court

In re: *

TEHUM CARE SERVICES, INC., * CASE No.: 23-90086

Debtor *

BRUMAN ALVAREZ, *pro-se*, * Civil Case No.: 1:22-cv-02382-MJM

Claimant/Holder. *

* * * * *

BRUMAN ALVAREZ'S MOTION FOR APPOINTMENT OF COUNSEL

Pursuant to the applicable Bankruptcy Code and Bankruptcy Rules and Local Rules, and the Complex Case Procedures, Bruman Alvarez, Claimant-Holder, moves for an Order from this Court appointing counsel to represent him in this case. In support of this motion, Claimant states:

1. Claimant cannot afford to hire a lawyer. The prison library do not have any legal books dealing with Bankruptcy law. Thus, his imprisonment greatly limit his ability to litigate this case.
2. Claimant's case has merits. After defeating Debtor-Defendants' Motion for Summary Judgment, in civil case 1:22-cv-02382-MJM, the District Court appointed him counsel, Christopher Getti, Bar # 22070 (*Morgan & Morgan, DC PLLC.*, 20 M Street, SE, Suite 600, Washington, DC 20003).
3. Mr. Getti assured Claimant he could not assist him with the bankruptcy litigation case because he is



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not license to practice law in Texas and because he is not a bankruptcy attorney.

4. In good faith, a bankruptcy attorney would help Claimant and Mr. Getti to apply the law properly or at minimum to help Claimant protect his rights.
5. Claimant's rights already are jeopardized by actions of Debtors' legal team. An Emergency Motion to Enforce An Injunction Against Interference with Claimant's Opt-Out Rights was filed by Claimant pro-se on 9-11-2025 which is pending before the Court.

WHEREFORE, Claimant respectfully prays for this Honorable Court to appoint him counsel to represent him in all bankruptcy litigation.

Respectfully submitted,

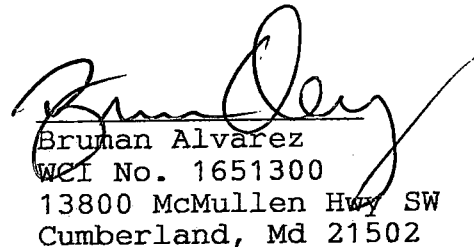


Bruman Alvarez

Claimant pro-se

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on NOVEMBER 25, 2025, a copy of the foregoing motion was mailed first class, postage prepaid, to the Nathan Ochsner, Clerk of United States Bankruptcy Court, for the Southern District of Texas, 515 Rusk Street, Houston, TX 77002



Bruman Alvarez
WCI No. 1651300
13800 McMullen Hwy SW
Cumberland, Md 21502

Pro-se Claimant

Bruman Alvarez
WCI No. 257455-1651300
13800 McMullen Hwy SW
Cumberland, MD 21502

United States Courts
Southern District of Texas
FILED

DEC 01 2025

Nathan Ochsner, Clerk of Court

ATTN: Nathan Ochsner,
Clerk of Court



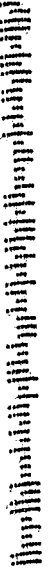
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United States Bankruptcy Court
Southern District of Texas
515 Rusk Street
Houston, TX 77002



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