Docket #2686 Date Filed: 06/10/2026

IN RE:
Tehum Care Services Inc.
Debtor
v.
Michael Chapman
Plaintiff

In The
For The Southern District of Texas
Houston Division

Case No.
23-90086

United States Courts
Southern District of Texas
FILED
JUN 09 2026
Nathan Ochsner, Clerk of Court

Notice To This Court of Plaintiff's Intent To Continue To Litigate His Claim Against The Debtors And Incorporated Motion For Counsel To Be Appointed Due To Extraordinary Circumstances

Comes Now, the Plaintiff, Michael Chapman notifies this Court that the debtors/defendants in this case, Tehum/Coriem/Yes Care failed to cure the default by the deadline in regards to payments due to the PI/WD, and GUC Trusts and therefore there was a termination event. Chapman, the plaintiff was/is a member/claimant of the PI/WD Trust. But he was also given a deadline of June 3rd 2026 to file any lawsuit and/or continue litigation against Tehum. Chapman is a pro-se inmate/claimant who is not represented by counsel at this moment. He is not well versed in bankruptcy law, more so that he is in Alabama and this case in Texas. Since Tehum filed in 2023, Chapman has won his Fed. case in the Fed. Cir. of Appeals in the 11th circuit. Defendandants have already conceded/settled to some extent as they have and are currently having his cataract in his right eye corrected, have not objected to his claim on Tehum in bankruptcy court in this Court. It is already difficult to navigate



the Alabama District Court proceedings as Chapman is in poor health. The Fed AL Distr. Court appointed him counsel after his appeal was decided in his favor. As a note the 11th Cir Court of Appeals also had previously appointed him counsel for the Appeal. The appeal attorney did a great job for him and she was out of Texas. (Fed. Dist. middle Dist. of Alabama case # 2:20-cv-00007, Fed. 11th Cir. Appeals case # 23-11132) The lawyer the Fed. Dist. Court appointed, Wallace Mills/Montgomery AL did not or show any interest in the case and subsequently withdrew when Chapman retained Martin Weinberg on a contingency basis. But before he had all the facts, laws, legal decisions and neither attorney was aware that Chapman had won his case on appeal, therefore Chapman discharged them from the AL. Dist Court case, because in essence they would have further confused the case because they weren't even familiar with the case. The PI/WD Personal Injury Trust has approved his claim and said he was entitled to his claim at "Tier 3 Scaling Factor of 1.1-

Therefore, Chapman honorably requests appointment of counsel, specifically one who is experienced in bankruptcy law and experienced with the sometimes complex and confusing aspects of Texas Bankruptcy law and from Texas but who will contact Chapman directly and notify him of everything going on in this case and provide such as this court has, everthing

that is filed with this Hon. Court. Chapman makes this request because he is an incarcerated inmate, acting pro-se on his own behalf, in very poor health, the extreme complex nature of the case as well as confusing, his inexperience with bankruptcy law especially being in Alabama with NO resources in the Prison law library on Texas law which puts him at a major disadvantage. Being in the PI/WD Trust and it still litigating on behalf of the claimants and them also stating that the deadline to file a lawsuit against the debtors is June 3rd, 2026, he does not know what step to take next.

Chapman fully intends to pursue his claim through the PI/WD Trust and/or further litigation in this Hon. Court but he does not know what to do next. Therefore, he requests Counsel be appointed from Texas, experienced in Bankruptcy for this case, NO: 23-90086 to assist him and protect his rights as well as his claim.

Michael Chapman #271129

Certificate Of Service

I hereby certify that I have served a copy of the instant motion/pleading upon the **parties listed below**, by placing same in the U.S. Mail by handing over to Prison Officials for mailing, 1st class postage, prepaid and affixed and thus invoking the MailBox Rule pursuant to Houston v. Lack, 487 U.S. 266(1988), .Done This Day of May, 24, 2026.

Respectfully Submitted,

X Michael Chapman

Printed Name Michael Chapman

AIS#/Dorm #271129 B2-17A

Address 3520 Marion Spillway Rd

City/State/Zip Elmore, AL 36025

Served on:

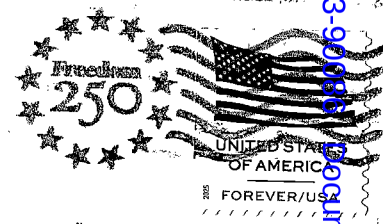
(1) US Bankruptcy Court Southern Distr. of Texas/Houston Div.
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Houston Texas 77002

(2) Gray Reed ESQ
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(3)

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