Docket #2707 Date Filed: 07/31/2026

Aakash Dalal
SBI# 792652E
215 Burlington Road South
Bridgeton, NJ 08302
Creditor, *pro se*

United States Courts
Southern District of Texas
FILED
JUL 31 2026
Nathan Ochsner, Clerk of Court

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS (HOUSTON)

In re Tehum Care Services, Inc., Debtor. 205 Powell Place Suite 104 Brentwood, TN 37027 Tax ID/EIN: 23-2108853	**Bankruptcy Petition No.: 23-90086** **Bankruptcy Judge Christopher M. Lopez** **Chapter 11 - Voluntary**

CREDITOR AAKASH DALAL'S MOTION TO ENFORCE THE CHAPTER 11 PLAN OF REORGANIZATION

IF YOU OBJECT TO THE RELIEF REQUESTED, YOU MUST RESPOND IN WRITING. UNLESS OTEHRWISE DIRECTED BY THE COURT, YOU MUST FILE YOUR RESPONSE ELECTRONICALLY AT HTTPS://ECF.TXSB.USCOURTS.GOV/ WITHIN TWENTY-ONE DAYS FROM THE DATE THIS MOTION WAS FILED. IF YOU DO NOT HAVE ELECTRONIC FILING PRIVILEGES, YOU MUST FILE A WRITTEN OBJECTION THAT IS ACTUALLY RECEIVED BY THE CLERK WITHIN TWENTY-ONE DAYS FROM THE DATE THIS MOTION WAS FILED. OTHERWISE, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED.

Creditor Aakash Dalal[1] ("Mr. Dalal") respectfully requests that the Court enter an Order directing the Tehum Personal Injury Settlement Trust Claims Administrator ("Administrator") to comply with the Chapter 11 Plan of Reorganization ("Plan"). Specifically, on April 22, 2026, Mr. Dalal has requested that, in accordance with the Plan, the Administrator reconsider the valuation of his claim, and submit his reconsideration request for arbitration. See Certification of

[1] Mr. Dalal is the plaintiff in a civil rights in the Superior Court of New Jersey against Corizon Health, Inc. Aakash Dalal v. County of Bergen, et al, Superior Court of New Jersey, Passaic County Vicinage, Docket No.: PAS-L-2979-19.

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Mr. Dalal at. The Plan specifically permits a claimant to file a request for reconsideration and requires the Administrator to submit the request for arbitration. ECF# 1815-2 at 9-10. To date, the Administrator has failed to comply with this requirement in the Plan. Accordingly, Mr. Dalal requests that the Court issue an Order requiring the Administrator to comply with Section K of Article IV (General Trust Provisions) of the Chapter 11 Plan and Section 4.1(b) of Article 4 of the Trust Agreement.

Respectfully submitted:

Aakash Dalal
Creditor, *pro se*

Dated: July 27, 2026

CERTIFICATION OF SERVICE

On July 27, 2026, I mailed copies of the documents herein via first-class United States mail to the following:

Clerk of the Court
United States Bankruptcy Court
P.O. Box 61010
Houston, TX 77208

All counsel of record and all parties of record authorized to receive this objection.

I certify under penalty of perjury that the foregoing statements are true. I am aware that if any of the statements made by me are willfully false, I am subject to punishment.

Aakash Dalal,
Plaintiff, *pro se*

Dated: July 27, 2026

Aakash Dalal
SBI# 792652E
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Bridgeton, NJ 08302
Creditor, *pro se*

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS (HOUSTON)

In re Tehum Care Services, Inc., Debtor. 205 Powell Place Suite 104 Brentwood, TN 37027 Tax ID/EIN: 23-2108853	**Bankruptcy Petition No.: 23-90086** **Bankruptcy Judge Christopher M. Lopez** **Chapter 11 - Voluntary**

CERTIFICATION OF AAKASH DALAL

1. I am a creditor in this matter and am presently incarcerated. I submitted this certification in support of my motion to force Section K of Article IV (General Trust Provisions) of the Chapter 11 Plan and Section 4.1(b) of Article 4 of the Trust Agreement in this case. ECF# 1815-2 at 199.
2. On April 10, 2026, the Tehum Personal Injury Settlement Claims Trust sent me a "Notice of Tier Designation & Notice of Interim Trust Distribution". This letter designated my claim as Tier 4 with a Scaling Factor of 1.0. A true copy of this letter has been appended as Exhibit 1.
3. Article IV.K provides that "A Claimant may make a request for reconsideration of ... (ii) the valuation of the Submitted Claim by the Trust (a " Reconsideration Request") within ninety (90) days of receiving ... an Allowed Claim Notice." In re Tehum Care Services, Inc., No. 23-90086, ECF# 1815-2 at 9-10. This provision also requires the Settlement

Trust Claims Administrator to develop binding arbitration procedures and submit the reconsideration request for arbitration. Id.

4. On April 22, 2026, in accordance with Article IV.K, I sent a Reconsideration Request to the Tehum Personal Injury Settlement Trust Claims Administrator. A true copy of my request has been appended as Exhibit 2.
5. To date, I have received no response from the Administrator, no arbitration procedures have been provided, and the matter has not been submitted for arbitration.
6. Accordingly, the Administrator has refused to meet his obligations under the agreed upon Plan. The Court must issue an order enforcing the Plan and requiring the Administrator to follow the reconsideration procedures outlined in Article IV.K.

I certify under penalty of perjury that the foregoing statements are true. I am aware that if any of the statements made by me are willfully false, I am subject to punishment.

Aakash Dalal
Creditor, *pro se*

Dated: July 27, 2026

EXHIBIT 1

Aakash Dalal
SBI# 792652E
South Woods State Prison
215 Burlington Road South
Bridgeton, NJ 08302

April 22, 2026

VIA U.S. MAIL
Tehum Personal Injury Settlement Trust Claims Administrator
PO Box 89
Wilmington, DE 19899

RE: Reconsideration Request
Claim #118 – Aakash Dalal (Token #DYRGGWCM)

Dear Settlement Administrator:

In accordance with Section K of Article IV (General Trust Provisions) of the Bankruptcy Plan in this matter, I am requesting reconsideration of the valuation and designation of my claim. In your April 10, 2026 "Notice of Tier Designation & Notice of Interim Trust Distribution", you designated my claim as "Tier 4" with a "Scaling Factor of 1.0."

Article IV.K provides that "A Claimant may make a request for reconsideration of … (ii) the valuation of the Submitted Claim by the Trust (a "Reconsideration Request") within ninety (90) days of receiving … an Allowed Claim Notice." The April 10, 2026 notice was the first notice I received containing a tier designation and valuation.

The provision of the Plan requires that you develop binding arbitration procedures and that the matter be submitted for arbitration. Please provide me a copy of the procedures and submit this matter for arbitration.

Alternatively, I am willing to settle this matter for an agreement to elevate my claim to Tier 3 with a Scaling Factor of 1.2 and the provision of the appropriate pro rata interim distribution. To the extent my request for arbitration is denied, I will be required to file the appropriate motion in court.

Thank you for your attention to this matter.

Sincerely:

Aakash Dalal

EXHIBIT 2

Tehum Personal Injury Settlement Trust
Administered by NextClaim Solutions

PO Box 89 Wilmington DE, 19899
(866) 372-2884
support@tehumcareservicessettlement.com

April 10, 2026

Aakash Dalal
#792652E SBI
215 Burlington Road South
Bridgeton, NJ 08302

RE: **Claimant: Aakash Dalal**
Token #: DYRGGWCM

Dear Aakash Dalal,

Enclosed please find the following three items:

1. Notice of Tier Designation & Notice of Interim Trust Distribution. This Notice sets forth:
   A. Your Tier and the Scaling Factor for your Allowed Claim as determined by the Trustee of the Tehum Personal Injury Settlement Trust ("Trust"); and
   B. Your share of an Initial Distribution from the Trust that will be paid to you after you return a signed Acceptance and Release;
2. Acceptance and Release. Before your share of the Initial Distribution can be paid to you by the Trust, you must first complete, sign, and return the enclosed Acceptance and Release to the Claims Administrator at the following address:

   Tehum Personal Injury Settlement Trust Claims Administrator
   PO Box 89
   Wilmington, DE 19899

3. Settlement Payment Default Questions and Answers (the "Default Q&A"). The enclosed Default Q&A provides you with general information regarding common questions about the Settling Parties' default. **The Trustee of the Trust and his lawyers are not your lawyers. They will not advise you regarding your claim(s) and whether you can or should pursue your claim(s) against the Settling Parties**. If you have questions about how you might pursue your claims against the Settling Parties, you are encouraged to contact a lawyer.

Thank you,

Tehum Personal Injury Settlement Trust Claims Administrator

Tehum Personal Injury Settlement Trust
Administered by NextClaim Solutions

PO Box 89 Wilmington DE, 19899
(866) 372-2884
support@tehumcareservicessettlement.com

April 10, 2026

Notice: The following is being provided to you because the Trustee of the Tehum Personal Injury Settlement Trust has deterimed that you have an Allowed Claim. The Trustee has designated your Tier and any Scaling Factors. The Trustee has also approved an Intial Payment Percentage. The Trustee and his lawyers are not your lawyers and will not provide you with legal advice. You should seek the advice of legal counsel before returning the Release that is included with this notice, as it could impact your legal rights.

Aakash Dalal
#792652E SBI
215 Burlington Road South
Bridgeton, NJ 08302

RE: NOTICE OF TIER DESIGNATION & NOTICE OF INTERIM TRUST DISTRIBUTION
Claimant: Aakash Dalal
Token #: DYRGGWCM

Dear Aakash Dalal,

As you may be aware, the Settling Parties defaulted on their Installment Settlement Payments and are therefore in breach of the Estate Party Settlement. As of March 5, 2026, all Plan injunctions, stays, or releases provided in favor of the Released Parties that were in effect under the Plan are deemed terminated and void and the Channeling Injunction and all protections afforded to the Released Parties set forth in Article IX.I.1 of the Plan have terminated automatically. *See* Plan at Art. IV.B.2 & Art. IX.I.5.

Your Tier Designation: The Trustee of the Tehum Personal Injury Settlement Trust (the "Trust") has reviewed your Trust Claim Submission. The Trustee determined that you have an Allowed Claim designated as follows:

- **TIER 4**
- **SCALING FACTOR of 1.0.**

As provided in the Plan and the Trust Distribution Procedures, the Trustee assigned Scaling Factors in his discretion.

Initial Payment for Your Allowed Claim: The Trustee has recommended, and the Trust Advisory Committee ("TAC") has approved, an interim Trust distribution of approximately $2,500,000.00 (the "Initial Trust Distribution"). To be clear, you are not approved or entitled to receive $2,500,000.00 from the Trust. Instead, the Trust's $2,500,000.00 Initial Distribution will be allocated among all holders of Allowed Claims on a pro rata basis, ensuring an equal percentage recovery for all holders of Tiered

Tehum Personal Injury Settlement Trust
Administered by NextClaim Solutions

PO Box 89 Wilmington DE, 19899
(866) 372-2884
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Claims. Allowed Claims are grouped into five tiers pursuant to the Trust Distribution Procedures, and payment amounts will be determined by tier, with higher-tiered claims receiving larger distributions than lower-tiered claims, but with all holders of Tiered Claims receiving the same percentage of their Allowed Claim, plus any scaling factor.

You are entitled to receive an interim distribution in the amount of $2,020.86 for your Allowed Tier 4 Claim with a Scaling Factor of 1.0.

How to Receive Payment: To receive your pro rata share of the Initial Trust Distribution, you must: 1.) sign and return the entire enclosed partial Release; *and* 2.) have provided complete payment instructions to the Claims Administrator in response to the Trustee's prior request.

PLEASE TAKE NOTICE that the enclosed partial Release will release the Trust, the Trustee, the TAC and their affiliated professionals and related parties (the foregoing are collectively referred to as the "PI/WD Trust Released Parties"), but will not release any other Released Parties, including but not limited to YesCare Corp., its wholly owned subsidiaries (including CHS TX, Inc.), and Yitzchak Lefkowitz a/k/a Isaac Lefkowitz. Therefore, you will have ninety (90) days from March 5, 2026, to commence causes of action against the Released Parties, exclusive of the PI/WD Trust Released Parties.

Future Distributions of Supplemental Payments: The Trustee is currently considering options to enforce the Estate Party Settlement to seek additional amounts from the Settling Parties. If the Trustee recovers additional funds from the Settling Parties, then more funds may be available to include in future supplemental distributions from the Trust. The Trustee cannot estimate the value of any future recovery or when any future recovery might occur. It is possible that the Trust may not recover any additional funds from the Settling Parties. If additional funds are not recovered from the Settling Parties, then the Trust will distribute funds in accordance with the Trust Distribution Procedures.

Please contact the Tehum Care Services Settlement Trust with all questions.

Thank you,

Tehum Personal Injury Settlement Trust Claims Administrator

Aakash Dalal
SBI# 792652E
South Woods State Prison
215 Burlington Road South
Bridgeton, NJ 08302

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VIA U.S. MAIL
Clerk of the Court
United States Bankruptcy Court
P.O. Box 61010
Houston, TX 77208

RE: Filing of Motion
In re Tehum Care Services, Inc.
Bankruptcy Petition No.: 23-90086

Dear Clerk:

Please find enclosed for filing in the matter above the following documents:

1. Notice of Motion to Enforce the Chapter 11 Plan & Certification of Service
2. Certification in Support of Motion

Thank you for your attention to this matter.

Respectfully submitted:

Aakash Dalal,
Creditor, *pro se*