Docket #2717 Date Filed: 08/27/2026

UNITED STATE BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE: TEHUM CARE SERVICES, INC. Debtor.	Case No. 23-90086 (CML) Chapter 11

CREDITOR TIFFANY R. SMITH'S COUNSEL'S MOTION FOR LEAVE TO WITHDRAW AND TO TERMINATE REQUESTS FOR FURTHER NOTICE

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Robert W. Johnson and Johnson Jensen LLP (collectively, "Counsel"), counsel of record for creditor Tiffany R. Smith ("Smith"), respectfully move for entry of an order: (1) granting Counsel leave to withdraw from any further representation of Smith in this bankruptcy case; (2) terminating any request by Counsel or Smith for special notice or service; and (3) removing Counsel and Smith from the electronic and paper service lists, except to the extent service on Smith is expressly required by the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, or an order of this Court.

In support, Counsel states:

1. Smith holds personal-injury claims arising from alleged acts or omissions involving Corizon and related persons or entities.

2. Counsel appeared in this case on Smith's behalf to protect her interests in connection with the Debtor's bankruptcy, including issues concerning the treatment of personal-injury claims and the effect of the bankruptcy proceedings upon Smith's claims against Corizon and related parties.

3. On March 3, 2025, the Court entered its Order Confirming the First Modified Joint Chapter 11 Plan of the Tort Claimants' Committee, Official Committee of Unsecured Creditors, and Debtor. Dkt. No. 2014 (the "Confirmation Order").



4. Smith did not complete participation in the personal-injury settlement process established under the Plan, did not receive a distribution through that process, and does not intend to seek further relief from this Court relating to participation in that settlement process.

5. On March 5, 2026, the PI/WD Trustee and GUC Trustee filed their Notice of Failure to Cure Settlement Payment Default; Automatic Termination of Channeling Injunction; and Deadline to Commence Causes of Action Against Released Parties. Dkt. No. 2617 (the "Termination Notice").

6. Under the Plan and the Termination Notice, the uncured payment default automatically terminated the Channeling Injunction and the other Plan injunctions, stays, and releases that had been in effect for the benefit of the Released Parties.

7. In light of these developments, Smith's continued participation in this bankruptcy case is neither contemplated nor necessary.

8. Counsel has informed Smith of the proposed withdrawal and the consequences of withdrawal. Smith consents to the relief requested in this Motion.

9. Smith and Counsel no longer require notices concerning the general administration of this bankruptcy case. Accordingly, Counsel requests termination of any notice of appearance, request for special notice, or similar request previously filed on behalf of Smith.

10. This request does not seek to excuse service upon Smith when service is expressly required by the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, or an order of this Court.

11. This Motion seeks procedural relief only.

12. Withdrawal is appropriate under Local Rule 83.2 of the United States District Court for the Southern District of Texas. The relief requested is also consistent with the applicable rules of professional conduct because Smith has received notice, consents to withdrawal, and will not be materially prejudiced.

WHEREFORE, Counsel respectfully requests that the Court enter an order:

A. Granting Counsel leave to withdraw as counsel for Tiffany R. Smith in this bankruptcy case;

B. Terminating any notice of appearance, request for special notice, or similar notice request filed by Counsel or Smith;

C. Directing the Clerk, the Debtor, the trustees, the claims and noticing agent, and all other parties maintaining service lists in this case to remove Counsel and Smith from the electronic, master, special, and paper service lists;

D. Providing that neither Counsel nor Smith is required to receive further notices or pleadings in this bankruptcy case except when service upon Smith is expressly required by the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, or an order of this Court;

E. Providing that the requested procedural relief does not withdraw, release, settle, compromise, adjudicate, or otherwise affect any substantive claim, cause of action, defense, or right held by Smith; and

F. Granting such other and further relief as the Court deems just and appropriate.

Respectfully submitted,

s/ Robert W. Johnson
Robert W. Johnson, Ind. Atty. No. 17391-49
JOHNSON JENSEN LLP
1101 N. Delaware St.
Indianapolis, IN 46202
317.269.7799 Telephone
317.269.7784 Fax
rjohnson@johnsonjensen.com

Attorney for Tiffany Smith

CERTIFICATE OF SERVICE

I certify that on August 27, 2026, the foregoing document was served upon the following all parties of record through the CM/ECF system.

s/ Robert W. Johnson
Robert W. Johnson, Ind. Atty. No. 17391-49

UNITED STATE BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

IN RE:

TEHUM CARE SERVICES, INC.

Debtor.

Case No. 23-90086 (CML)
Chapter 11

ORDER GRANTING CREDITOR TIFFANY R. SMITH'S COUNSEL'S MOTION FOR LEAVE TO WITHDRAW AND TERMINATING REQUESTS FOR FURTHER NOTICE

Upon consideration of Creditor Tiffany R. Smith's Counsel's Motion for Leave to Withdraw and to Terminate Requests for Further Notice, the Court finds that the requested relief should be granted. It is therefore ORDERED that:

1. The Motion is GRANTED.
2. Robert W. Johnson and Johnson Jensen LLP are authorized to withdraw as counsel for Tiffany R. Smith in this bankruptcy case.
3. Any notice of appearance, request for special notice, or similar notice request filed by withdrawing Counsel or Tiffany R. Smith is TERMINATED.
4. Neither withdrawing Counsel nor Tiffany R. Smith is required to receive further notices, pleadings, or other filings in this bankruptcy case, except when service upon Tiffany R. Smith is expressly required by the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, or a further order of this Court.
5. This Order concerns the withdrawal of counsel and termination of notice requests only. Nothing in this Order withdraws, releases, settles, compromises, adjudicates, or otherwise affects any claim, cause of action, defense, or other substantive right held by Tiffany R. Smith.

Signed _____, 2026

_____
UNITED STATES BANKRUPTCY JUDGE
Christopher Lopez, Judge