Docket #2719 Date Filed: 09/01/2026

UNITED STATES BANKRUPTCY COURT
Southern DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED
SEP 01 2026
Nathan Ochsner, Clerk of Court

In Re SIMPSON:
Plaintiff,

V.

CHAPTER 11
Case No: 23-90086 (CML)
Hon. Christopher Lopez

Corizon Health Inc. et.al.
Defendants.
_____/

PLAINTIFF'S MOTION TO OPT-OUT FROM
THE THIRD-PARTY RELEASE
AND CERTIFICATE OF SERVICE

Now Comes Plaintiff Jimmie L. Simpson, In Pro Per, Pursuant To Fed.R.Civi.P.7(b); (U.S. District Court, E.D. Of Michigan Case No. 1:24-cv-10996, District Judge Robert J. White; Magistrate Judge Anthony P. Patti; Corizon Health Inc. LLC'S Attorney Jason S. Brookner, Texas Bar No. 24033684). And Moves This Honorable Court To Opt-Out From The Third Party Release: The Non-Debtors Defendants And The Corizon LLC'S Defendants, Based On The Bankruptcy Discharge And Conformation Order. And, states the following in support thereof:

1.) That In April Of 2024, Plaintiff, Filed A Civil Complaint Pursuant To 42 USC § 1983, Against The Debtor Corizon Health Inc. LLC, And Non-Debtor Corizon Individual Defendants.

2.) That On September 26th, 2024, The Debtor Corizon Health Inc. LLC, Defense Attorney Mr. Jason S. Brookner, Texas Bar No. 24033684, Filed A Suggestion Of Bankruptcy And Notice Of Automatic Stay.

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3.) As Of This Date, in all other respect The Debtor Corizon Health Inc. LLC, Defense Attorney, has not filed an answer to Plaintiff's Compleint; Nor, Provided Plaintiff, With The March 3th, 2025, Discharge And Confirmation Order.

ARGUMENT I.

a.) That at all times relevant to this cause of action; Plaintiff has never received or been provided with, The March 3th, 2025, Discharge And Confirmation Order.

b.) Plaintiff, was not provided with a Ballot Or Opt-Out Form; And Therefore, was prevented from: 1.) Having, actual notice; 2.) Having, a fair opportunity, to file a timely responses, with regards to The Ballot And Opt-Out Form; 3.) Participating, in the process; and 4.) Filing, a timely objection to The Third-Party Release.

c.) Thus, it's these particular faulty, deceptive, inadequate and inappropriate procedures, utilized by The Debtor Corizon Health Inc. LLC Defendants And Attorney that run afoul of The Due Process Clauses Of The US Constitution. See In Re Tehum Care Servs. 672 B.R. 108, 112-114 (Aug. 7, 2025).

Wherefore, Plaintiff Prey And Request This Honorable Court To "Grent His Motion To Opt-Out From The Third-Party Release With Certificate Of Service.

CERTIFICATE Of SERVICE

STATE OF MICHIGAN)
)ss:
COUNTY OF MONTCALM)

Jimmie Simpson, being first duly sworn, deposes and says that on August 26 th, 2026, He Filed/Mailed His Opt-Out From The Third Party Release; To The US Bankruptcy Court, Southern District Of Texas, Located At P.O. Box 61010, Houston Tx. 77208;

By handing a signed expedited legal disbursement and envelope conteining His Opt-Out From The Third Party Release, To

Prison Authority; For, the purpose of being Mailed by The US Postal Service.

"Executed under penalty of perjury on this 26th, day of August 2026."

PURSUANT TO 28 USC § 1746(2)
AFFIANT

Respectfully Submitted,

JIMMIE SIMPSON (183627)
Plaintiff In Pro Per
Carson City Corr.
Facility
10274 Boyer Road

Dated: 8-26-26

Jimmie Simpson #183627
Carson City Corr. Facility
10274 Boyer Road
Carson City, MI 48811

GRAND RAPIDS MI 495
29 AUG 2026PM 3

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US POSTAGE PITNEY BOWES
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US Bankruptcy Court
Southern District Of Texas
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Houston, TX. 77208

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