

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

DEC 23 2019

David J. Bradley, Clerk of Court

In re: §
§
Neighbors Legacy Holdings, Inc., et al, § Case No. 18-33836, Chapter 11
Debtor, §

Adversary Proc. No. 19-03442

Sohail Alam, Plaintiff

Neighbors Health, LLC, Neighbors, GP, LLC,
EDMG, LLC, Dharmesh Patel, MD, Michael
Chang, MD, Quang Henderson, MD, Hitesh
Patel, MD, Andy Chen, MD, Cyril Gillman,
Setul Patel, MD, Paul Alleyne, Thomas
Gruenert.
Defendants,

Dear Court Clerk

Please file the pleadings referenced below into the kccllc.net website electronic files in Case #
18-33836:

Pleading # 54, 66, 69, 71, 73, *65*

Submitted By:

Sohail Alam
Sohail Alam, Pro se

Adversary Case # 19-3442

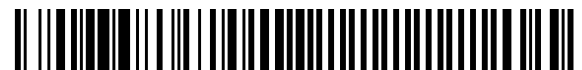
Main Case # 18-33836

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December 6, 2019

The Honorable Judge Marvin Isgur
U.S. Bankruptcy Court Southern District of Texas
515 Rusk Avenue
Houston, Texas 77002

Ref: Case # 19-3442 and 18-33836

Honorable Marvin Isgur:

Respectfully, the purpose of my letter is to inform you that I received a letter from Mr. John Higgins (attached), threatening me to withdraw my pleading that requests this Court to take a judicial notice on the filings and arguments that Mr. Higgins and Mr. Davenport have made in this case.

I am scared and somewhat puzzled as to their motive in consistently calling me a liar and making all efforts to deny me my constitutional rights.

As you know, it has been exactly one year since I first informed this Court of the debtors' bad faith conduct. I have since provided this court with over 35 pieces of evidence and a sworn affidavit attesting to my veracity, and defendants' culpable conduct.

In the March 22, 2019 pleading, which they found it frivolous, I informed the Court that Mr. Higgins misled the Court about who owned the software. Because of my pleading, Mr. Higgins changed his pleading and acknowledged that debtors, according to the Agreement, did own the software. Similarly, the filing and then seeking this Court to reject my Administrative Services Agreement in September 2018, as records show, was equally dishonest based on the July 28 and 29, 2018 email exchange between Mr. Higgins and Mr. Chad Shandler, which by the way, was concealed from this court. [dkt 848, 227].

In the November 4, 2019 pleading, all I did was to respond to the questions this Court may have asked me at the hearing. Because I am deaf in my right year¹ I couldn't make out the judge's questions and thought I had the duty to respectfully provide the judge with clarity to the questions he may have asked me at the hearing, and I filed my pleading that same day. [dkt 69]

In the November 22, 2019, pleading, I was responding to defendant Patel's outrageous argument. I pointed out that Mr. Davenport had knowledge of the July 11, 2018 email in which defendant Patel and defendant Gruenert were found to be scheming to hurt me. That, Mr. Davenport manipulated the words solely to influence the Judge's decision. His conduct was deplorable. [dkt 70, 71]

By November 26, 2019, I had had it with the defense counsel misleading the court especially when defendant Axton [dkt 72] sought this court to disregard the long-standing position of a Pro se litigant, called me an imposter, a carpet beggar, and my cause not worthy of the expense. I was therefore, forced to bring to Court's attention that it was time for the honorable judge to look at the other side, their misconduct, and

¹ Court transcripts, March 22, 2019, and November 4, 2019 will show I am on the record talking about my deafness

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just what is it that defendants are hiding and afraid would be exposed - if this case goes to trial [dkt 73]. I also argued that my inarticulate pleading (which defendants are seeking to dismiss) "pales" in comparison to defendants' continued misrepresentations and violations, including, but not limited to:

Bankruptcy Rule 9011(b): Mr. Higgins and Mr. Davenport offered arguments they knew were false.

ABA Rule 1.2: Mr. Higgins and Mr. English cannot defend Tensie Axton in her individual capacity, as well as continue to serve as counsel to the debtor companies

ABA Rule 1.7: Mr. Higgins and Mr. English have a conflict of interest in their representation of Ms. Axton and/or their personal interest.

ABA Rule 3.3: Mr. Higgins and Mr. English had complete knowledge of the facts related to the Administrative Services Agreement and Neighbors Telehealth Services, LLC, yet failed to disclose the truth to the Honorable court.

ABA Rule 4.1: Mr. Davenport's illegal use of particular documents under false pretense and manipulating/forging documents

ABA Rule 3.7: Because of their conduct, Mr. Higgins, Mr. English, and Mr. Davenport are "material witnesses" in the pending adjudicatory proceedings.

While I understand, *a man who is his own lawyer has a fool for his client*, and that Pro se plaintiffs are always laughed at. I know, my due process rights are being violated by these high-powered lawyers portraying me as some deranged and crazy person filing erroneous factual findings, hoping the Court will believe them and refuse to give me my day in Court.

I cannot believe that in 12 months, 1,000 pages of filings, 35+ exhibits showing fraud, conspiracy, defamation, sworn affidavits, debtors' bankruptcy, its Board and former lawyer, and even the CRO affirming and conceding to my claims – is still insufficient for the Counsel to prepare its defense. It is mind numbing to think how lawyers manipulate the laws and the system.

Respectfully,

//SD//

Sohail Alam

SA/jmi1262019

cc: File in Court Records
Circulate to Defense Counsel

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Sohail Alam, Plaintiff

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Chang, MD, Quang Henderson, MD, Hitesh
Patel, MD, Andy Chen, MD, Cyril Gillman,
Setul Patel, MD, Paul Alleyne, Thomas
Gruenert.

Defendants,

Certificate of Service

I hereby certify that on December 9, 2019, I served a true and correct copy of my letter to Judge Isgur via email to the address listed below:

Submitted By:

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