IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:

Chapter 11

TEHUM CARE SERVICES, INC.,¹

Case No. 23-90086 (CML)

Debtor.

NOTICE OF FURTHER REVISED PROPOSED ORDER

PLEASE TAKE NOTICE that attached hereto is a further revised proposed order

granting the Debtor's Emergency Motion to Extend and Enforce the Automatic Stay [Docket No. 7].

PLEASE TAKE FURTHER NOTICE that attached hereto as **Exhibit A** is a redline of

the revised proposed order marked against the version filed at Docket No. 30.

[Remainder of page intentionally left blank.]

¹ The last four digits of the Debtor's federal tax identification number is 8853. The Debtor's service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.



Respectfully submitted this 3rd day of March, 2023.

GRAY REED

By: /s/ Jason S. Brookner

Jason S. Brookner Texas Bar No. 24033684 Aaron M. Kaufman Texas Bar No. 24060067 Lydia R. Webb Texas Bar No. 24083758 Amber M. Carson Texas Bar No. 24075610 1300 Post Oak Boulevard, Suite 2000 Houston, Texas 77056 Telephone: (713) 986-7127 (713) 986-5966 Facsimile: Email: jbrookner@grayreed.com akaufman@grayreed.com lwebb@grayreed.com acarson@grayreed.com

Proposed Counsel to the Debtor and Debtor in Possession

Certificate of Service

I certify that on March 3, 2023, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas to all parties authorized to receive electronic notice in this case.

/s/ Jason S. Brookner

Jason S. Brookner

<u>Exhibit A</u>

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:

TEHUM CARE SERVICES, INC.,¹

Chapter 11

Case No. 23-90086 (CML)

Debtor.

Re: Docket No. 7

INTERIM ORDER GRANTING DEBTOR'S EMERGENCY MOTION TO EXTEND AND ENFORCE THE AUTOMATIC STAY

Upon the motion (the "<u>Motion</u>")² of Tehum Care Services, Inc., the above-captioned debtor and debtor in possession (the "<u>Debtor</u>") for entry of an order (this "<u>Order</u>"), (a) confirming that the automatic stay applies, or extending the automatic stay, to cover the Non-Debtor Indemnified Parties in the Lawsuits, (b) enforcing the protections of sections 362 in each of the Lawsuits, and (c) granting related relief, all as more fully set forth in the Motion; and upon the *Declaration of Russell A. Perry in Support of Debtor's Emergency Motion to Extend and Enforce the Automatic Stay*; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Motion is in the best interests of the Debtor's estate, its creditors, and other parties in interest; and this Court having found that the -Debtor's notice of the Motion and

¹ The last four digits of the Debtor's federal tax identification number is 8853. The Debtor's service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

Case 23-90086 Document 107 Filed in TXSB on 03/03/23 Page 5 of 10

opportunity for a hearing on the Motion were appropriate <u>for the purposes of granting of interim</u> <u>relief</u> under the circumstances and no other notice need be provided <u>for such interim relief</u>; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the "<u>Hearing</u>"); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the <u>interim</u> relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. Pursuant to sections 105 and 362 of the Bankruptcy Code, the automatic stay of section 362(a) of the Bankruptcy Code is hereby extended on an interim basis to cover, and now applies to protect, the Non-Debtor Indemnified Parties listed on <u>Exhibit 1₅ (each, a "Listed Non-Debtor Indemnified Party")</u>, attached to this Order. The provisions of this paragraph 1 are effective immediately and shall continue for 35 days from the date of entry of this Order, through and including April 7, 2023 (the "Interim Stay Period"), unless further extended by the Court.

2. All claims or causes of action by which any party seeks to hold CHS TX, Inc. and/or YesCare Corp. liable for claims or causes of action against the Debtor are automaticallyarising out of, connected with or related to the liabilities allocated to the Debtor in the Divisional Merger are stayed pursuant to section 362(a) of the Bankruptcy Code, <u>during the Interim Stay Period</u> unless and untilfurther extended by the Court grants relief from the automatic stay upon motion and after a hearing.

3. All claims or causes of action asserted against CHS TX, Inc. and/or YesCare Corp. for, or that seek to hold CHS TX, Inc. and/or YesCare Corp. liable for, fraudulent conveyance, alter ego, successor liability, or to otherwise pierce the corporate veil, are property of the Debtor's estate under section 541(a) of the Bankruptcy Code and the pursuit of the same by any person or

2

Case 23-90086 Document 107 Filed in TXSB on 03/03/23 Page 6 of 10

entity other than the Debtor is automatically stayed pursuant to section 362(a) of the Bankruptcy Code <u>during the Interim Stay Period</u> unless and until<u>further extended by</u> the Court-grants relief from the automatic stay upon motion and after a hearing.

4. Unless otherwise ordered by the Court, pursuant to the express terms of section 362(a) of the Bankruptcy Code, and subject to sections 362(b), 555, 556, 559, 560, and 561 of the Bankruptcy Code, all persons (including individuals, partnerships, corporations, and other entities and all those acting on their behalf) and governmental units, whether of the United States, any state or locality therein or any territory or possession thereof, or any foreign country (including any division, department, agency, instrumentality or service thereof and those acting on their behalf), are hereby stayed, restrained and enjoined during the Interim Stay Period from:

- a) Commencing or continuing (including the issuance or employment of process) any judicial, administrative, or other action or proceeding against the Debtor or any <u>Listed</u> Non-Debtor Indemnified Party that was or could have been commenced before the commencement of the Debtor's chapter 11 case or recovering a claim against the Debtor or any <u>Listed</u> Non-Debtor Indemnified Party that arose before the commencement of the Debtor's chapter 11 case;
- b) Enforcing against (i) the Debtor or against property of its estate, or (ii) any <u>Listed Non-Debtor Indemnified Party or such party's property</u>, any judgment or order obtained before the commencement of the Debtor's chapter 11 case;
- c) Taking any action to obtain possession of property of the Debtor's estate or property of any <u>Listed</u> Non-Debtor Indemnified Party, or to exercise control over property of the estate or property of a <u>Listed</u> Non-Debtor Indemnified Party or interfere in any way with the conduct by the Debtor of its business;
- d) Taking any action to create, perfect, or enforce any lien against property of the Debtor's estate or of any <u>Listed</u> Non-Debtor Indemnified Party;
- e) Taking any action to create, perfect, or enforce against property of the Debtor or any <u>Listed</u> Non-Debtor Indemnified Party any lien to the extent that such lien secures a claim that arose prior to the commencement of the Debtor's chapter 11 case;
- f) Taking any action to collect, assess, or recover from the Debtor or any <u>Listed</u> Non-Debtor Indemnified Party a claim against the Debtor or such <u>Listed</u> Non-Debtor Indemnified Party that arose prior to the commencement of the Debtor's

chapter 11 case; or

- g) Offsetting any debt owing to the Debtor that arose before the commencement of the Debtor's chapter 11 case against any claim against the Debtor.
- 5. This Order shall not affect the exceptions to the automatic stay contained in sections 362(b) and 362(f) of the Bankruptcy Code or the right of any party in interest to seek relief from the automatic stay in accordance with section 362(d) of the Bankruptcy Code.

6. For the purposes of this Interim Order, the Further Hearing (defined below) shall be deemed a "contested matter" under Bankruptcy Rule 9014, and the rights of all parties (including any official committee that has been appointed (a "Committee")) are reserved with respect thereto, as well as the exercise of any and all rights and remedies available under the Bankruptcy Code and Federal Rules of Bankruptcy Procedure, including but not limited to the right to an adversary proceeding under Federal Rule of Bankruptcy Procedure 7001.

6.7. The Debtor is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

8. The Debtor shall serve copy of this Interim Order via overnight mail on the Debtor's 30 largest unsecured creditors, and the parties appearing on the Debtor's master service list, within one (1) business day of the entry of this Interim Order.

9. Counsel to the Debtor shall meet and confer with counsel to the Committee (once appointed) regarding the Motion, the Further Hearing and any discovery that may be requested or desired in connection therewith.

 7.10. The Court shall hold a further hearing on the Motion on ______, 2023 at

 :_____.m. Central Time- (the "Further Hearing").

Case 23-90086 Document 107 Filed in TXSB on 03/03/23 Page 8 of 10

8.11. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: _____, 2023

Christopher M. Lopez United States Bankruptcy Judge

<u>Exhibit 1</u>

Case Caption	Indemnified Clients	Non-Debtor Affilates	Indemnified D&Os / Employees
<i>Edmo v. Corizon Inc. et al.</i> , No. 1:17-cv-00151-BLW U.S. District Court for the District of Idaho	Idaho Department of Corrections		
N/A (Tort Claim Notice of Alex Scott)	Idaho Department of Corrections		
<i>Lyles v. Papendick et al.</i> , No. 2:19-cv-10673-LJM-KGA U.S. District Court for the Eastern District of Missouri		YesCare Corp. CHS TX, Inc.	
<i>Wolf v. Tewalt, et al.</i> , No. 1:21-cv-00226-BLW U.S. District Court for the District of Idaho	Rona Seigert (Idaho DOC employee)		
Branum v. City of Phoenix, et al, No. 4:21-cv-00357-RM U.S. District Court for the District of Arizona	David Shinn, Arizona DOC Director		
N/A (Tort Claim Notice of Bradley Armstrong)	Idaho Department of Corrections		
Cameron Regional Medical Center, Inc v. Corizon Health, Inc., et al., No. 5:22-cv-6122 U.S. District Court for the Western District of Missouri		YesCare Corp. CHS TX, Inc.	
Belcher v. Tewalt, et al., No. 1:21-cv-00393-BLW U.S. District Court for the District of Idaho	Rona Seigert (Idaho DOC employee)		
<i>Belcher v. Grace, et al.</i> , No. 1:22-cv-00256-BLW U.S. District Court for the District of Idaho	Rona Seigert (Idaho DOC employee)		
Curators of the Univ. of Missouri et al. v. Tehum Care Servs., Inc., et al., No. 23-04005 U.S. Bankruptcy Court for the Western District of Missouri (removed from the Circuit Court of Boone County, Mo., Div. 4, No. 22BA-CV01701-01)		YesCare Corp. CHS TX, Inc.	
Capitol Eye Care Inc. v. Tehum Care Services Inc., No. 22AC-CC07354 Circuit Court of Cole County, Missouri		YesCare Corp. CHS TX, Inc.	
Brightly v. Corizon Health Inc., et al., No. 4:21-cv-127-JCH-PSOT U.S. District Court for the District of Arizona	David Shinn, Arizona DOC Director		
Mintun v. Corizon Health Inc., et al., No. 1:21-cv-00124-BLW U.S. District Court for the District of Idaho	Rona Seigert (Idaho DOC employee)		
Stenberg v. Corizon Health, Inc., et al., No. 4:20-cv-10674 U.S. District Court for the Eastern District of Michigan		YesCare Corp. CHS TX, Inc.	Patricia Schmidt
Halo Branded Solutions, Inv. v. Corizon Health Inc., et al., No. 2023LA000124 Circuit Court of 18th Judicial Circuit Court of Illinois		YesCare Corp. CHS TX, Inc.	
Garcia v. Board of County Commissioners et al., No. 2:21 ev 00485 SMV GJF U.S. District Court for the District of New Mexico	Dona Ana County Board of Commissioners		
Bernstein v. Corizon Health Inc. et al., No. 18PI-CC00022 Circuit Court of Pike County, Missouri	Missouri Department of Corrections		
<i>Hyman v. YesCare Corp. et al.</i> , No. 3:22-cv-01081 U.S. District Court for the Middle District of Tennessee		YesCare Corp. CHS TX, Inc.	Sara Tirschwell, Scott King, Isaac Lefkowitz, Abraham Goldberger, & David Gefner
Wilkinson v. Corizon Medical Services, et al., No. 1:22-cv-00104-REP U.S. District Court for the District of Idaho	Rona Seigert (Idaho DOC employee)		
Snider v. Corizon Medical et al., No. 1:20-cv-648 U.S. District Court for the Western District of Michigan			Patricia Schmidt
<i>Estate of Milkiewicz v. Genesee County et al.</i> , No. 2:17-cv-13047 U.S. District Court for the Eastern District of Michigan	Genesee County		
<i>K.A. et al. v. City of New York et al.</i> , No. 1:16-cv-04936 U.S. District Court for the Southern District of New York	City of New York		Sidney Wilson
Briggs et al v. City of St. Louis, Missouri, et al., No. 4:22 ev 00282 DDN U.S. District Court for the Eastern District of Missouri	City of St. Louis		
Jackson v. Corizon Health Inc. et al., No. 2:19-cv-13382-GAD-PTM U.S. District Court for the Eastern District of Michigan		YesCare Corp. CHS TX, Inc.	
Miotke v. Corizon Health Inc. et al., No. 19-cv-47201 Circuit Court of Oregon, County of Multnoman	Clackamas County		
Stewart v. Ryan et al., No. 2:20-cv-01376-ROS-DMF U.S. District Court for the District of Arizona	Charles Ryan (Arizona DOC Director)		
Maxim Healthcare Staffing Servs., Inc. v. Tehum Care Servs., Inc. et al., No. 3:23-cv-0018 U.S. District Court for the Middle District of Tennessee		YesCare Corp. CHS TX, Inc.	

Case 23-90086 Document 107 Filed in TXSB on 03/03/23 Page 10 of 10

Case Caption	Indemnified Clients	Non-Debtor Affilates	Indemnified D&Os / Employees
<i>Chapman v. Dunn et al.</i> , No. 2:20-cv-00007-WKW-CSC U.S. District Court for the Middle District of Alabama	Jefferson Dunn, Ruth Naglich, & Mary Cooks (Alabama DOC employees)		
Schroder v. Johnson, et al., No. 1:21-cv-00106-BLW U.S. District Court for the District of Idaho	Rona Seigert (Idaho DOC employee)		
Schroder v. Zarkoff et al., No. 1:21-cv-00052-BLW U.S. District Court for the District of Idaho	Rona Seigert (Idaho DOC employee)		
Lynn v. Willnauer et al., No. 5:19 ev 03117 HLT U.S. District Court for the District of Kansas			Aleycia McCullogh Debra Lundry
Buchanan v. Tehum Care Services, Inc. et al., No. 4:22-cv-01361 U.S. District Court for the Eastern District of Missouri		YesCare Corp. CHS TX, Inc.	
Coleman v. Corizon et al., No. 5:21-cv-13061 U.S. District Court for the Eastern District of Michigan			Patricia Schmidt
Gamez v. United States, et al., No. 20-16180, 9th Cir. Court of Appeals (on appeal from 2:17-cv-02044-JJT-ESW, U.S. District Court for the District of Arizona)	Charles Ryan & Richard Pratt (Arizona DOC employees)		
Johnson v. Gulick et al., No. 2:20-cv-10147 U.S. District Court for the Eastern District of Michigan			Patricia Schmidt
Blake v. Corizon et al., No. 22-3048, 10th Cir. Court of Appeals (on appeal from 5:21-cv-3140-JAR-ADM, U.S. District Court for the District of Kansas)			Scot Yarnell
Saint Alphonsus Health Sys., Inc. v. Tehum Care Servs., Inc., et al., No. 1:23-cv-00065 U.S. District Court for the District of Idaho		YesCare Corp. CHS TX, Inc.	Sara Tirschwell Scott King
Saint Alphonsus Health Sys., Inc. v. Tehum Care Servs., Inc., et al., No. 1:23-cv-00065 U.S. District Court for the District of Idaho		YesCare Corp. CHS TX, Inc.	
St. Luke's Health System, Ltd et al v. Corizon, LLC et al., No. 1:18-cv-00289-DCN U.S. District Court for the District of Idaho		YesCare Corp. CHS TX, Inc.	
Nelson v. Corizon LLC, et al., No. 8:19-cv-449-CEH-JSS Pinellas County CircuitU.S. District Court, 6th Judicial Circuit for the Middle District of Florida	Florida Department of Corrections		
Hasty v. Corizon LLC et al., No. 2:22-cv-04054-SRB U.S. District Court for the Western District of Missouri		YesCare Corp. CHS TX, Inc.	
Kelly v. Corizon Health Inc. et al., No. 2:22-cv-10589-MAG-DRG U.S. District Court for the Eastern District of Michigan		YesCare Corp. CHS TX, Inc.	

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:

TEHUM CARE SERVICES, INC.,¹

Chapter 11

Case No. 23-90086 (CML)

Debtor.

Re: Docket No. 7

INTERIM ORDER GRANTING DEBTOR'S EMERGENCY MOTION TO EXTEND AND ENFORCE THE AUTOMATIC STAY

Upon the motion (the "<u>Motion</u>")² of Tehum Care Services, Inc., the above-captioned debtor and debtor in possession (the "<u>Debtor</u>") for entry of an order (this "<u>Order</u>"), (a) confirming that the automatic stay applies, or extending the automatic stay, to cover the Non-Debtor Indemnified Parties in the Lawsuits, (b) enforcing the protections of sections 362 in each of the Lawsuits, and (c) granting related relief, all as more fully set forth in the Motion; and upon the *Declaration of Russell A. Perry in Support of Debtor's Emergency Motion to Extend and Enforce the Automatic Stay*; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and this Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and this Court having found that it may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the Debtor's notice of the Motion and opportunity for a hearing on the Motion were appropriate for the purposes of granting of interim relief under the circumstances and no other notice need be

¹ The last four digits of the Debtor's federal tax identification number is 8853. The Debtor's service address is: 205 Powell Place, Suite 104, Brentwood, Tennessee 37027.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

Case 23-90086 Document 107-1 Filed in TXSB on 03/03/23 Page 2 of 6

provided for such interim relief; and this Court having reviewed the Motion and having heard the statements in support of the relief requested therein at a hearing before this Court (the "<u>Hearing</u>"); and this Court having determined that the legal and factual bases set forth in the Motion and at the Hearing establish just cause for the interim relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. Pursuant to sections 105 and 362 of the Bankruptcy Code, the automatic stay of section 362(a) of the Bankruptcy Code is hereby extended on an interim basis to cover, and now applies to protect, the Non-Debtor Indemnified Parties listed on <u>Exhibit 1</u> (each, a "<u>Listed Non-Debtor Indemnified Party</u>"), attached to this Order. The provisions of this paragraph 1 are effective immediately and shall continue for 35 days from the date of entry of this Order, through and including April 7, 2023 (the "<u>Interim Stay Period</u>"), unless further extended by the Court.

2. All claims or causes of action by which any party seeks to hold CHS TX, Inc. and/or YesCare Corp. liable for claims or causes of action against the Debtor arising out of, connected with or related to the liabilities allocated to the Debtor in the Divisional Merger are stayed pursuant to section 362(a) of the Bankruptcy Code, during the Interim Stay Period unless further extended by the Court.

3. All claims or causes of action asserted against CHS TX, Inc. and/or YesCare Corp. for, or that seek to hold CHS TX, Inc. and/or YesCare Corp. liable for, fraudulent conveyance, alter ego, successor liability, or to otherwise pierce the corporate veil, are property of the Debtor's estate under section 541(a) of the Bankruptcy Code and the pursuit of the same by any person or entity other than the Debtor is stayed pursuant to section 362(a) of the Bankruptcy Code during the Interim Stay Period unless further extended by the Court.

2

Case 23-90086 Document 107-1 Filed in TXSB on 03/03/23 Page 3 of 6

4. Unless otherwise ordered by the Court, pursuant to the express terms of section 362(a) of the Bankruptcy Code, and subject to sections 362(b), 555, 556, 559, 560, and 561 of the Bankruptcy Code, all persons (including individuals, partnerships, corporations, and other entities and all those acting on their behalf) and governmental units, whether of the United States, any state or locality therein or any territory or possession thereof, or any foreign country (including any division, department, agency, instrumentality or service thereof and those acting on their behalf), are hereby stayed, restrained and enjoined during the Interim Stay Period from:

- a) Commencing or continuing (including the issuance or employment of process) any judicial, administrative, or other action or proceeding against the Debtor or any Listed Non-Debtor Indemnified Party that was or could have been commenced before the commencement of the Debtor's chapter 11 case or recovering a claim against the Debtor or any Listed Non-Debtor Indemnified Party that arose before the commencement of the Debtor's chapter 11 case;
- b) Enforcing against (i) the Debtor or against property of its estate, or (ii) any Listed Non-Debtor Indemnified Party or such party's property, any judgment or order obtained before the commencement of the Debtor's chapter 11 case;
- c) Taking any action to obtain possession of property of the Debtor's estate or property of any Listed Non-Debtor Indemnified Party, or to exercise control over property of the estate or property of a Listed Non-Debtor Indemnified Party or interfere in any way with the conduct by the Debtor of its business;
- d) Taking any action to create, perfect, or enforce any lien against property of the Debtor's estate or of any Listed Non-Debtor Indemnified Party;
- e) Taking any action to create, perfect, or enforce against property of the Debtor or any Listed Non-Debtor Indemnified Party any lien to the extent that such lien secures a claim that arose prior to the commencement of the Debtor's chapter 11 case;
- f) Taking any action to collect, assess, or recover from the Debtor or any Listed Non-Debtor Indemnified Party a claim against the Debtor or such Listed Non-Debtor Indemnified Party that arose prior to the commencement of the Debtor's chapter 11 case; or
- g) Offsetting any debt owing to the Debtor that arose before the commencement of the Debtor's chapter 11 case against any claim against the Debtor.

Case 23-90086 Document 107-1 Filed in TXSB on 03/03/23 Page 4 of 6

5. This Order shall not affect the exceptions to the automatic stay contained in sections 362(b) and 362(f) of the Bankruptcy Code or the right of any party in interest to seek relief from the automatic stay in accordance with section 362(d) of the Bankruptcy Code.

6. For the purposes of this Interim Order, the Further Hearing (defined below) shall be deemed a "contested matter" under Bankruptcy Rule 9014, and the rights of all parties (including any official committee that has been appointed (a "<u>Committee</u>")) are reserved with respect thereto, as well as the exercise of any and all rights and remedies available under the Bankruptcy Code and Federal Rules of Bankruptcy Procedure, including but not limited to the right to an adversary proceeding under Federal Rule of Bankruptcy Procedure 7001.

7. The Debtor is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Motion.

8. The Debtor shall serve copy of this Interim Order via overnight mail on the Debtor's 30 largest unsecured creditors, and the parties appearing on the Debtor's master service list, within one (1) business day of the entry of this Interim Order.

9. Counsel to the Debtor shall meet and confer with counsel to the Committee (once appointed) regarding the Motion, the Further Hearing and any discovery that may be requested or desired in connection therewith.

 10.
 The Court shall hold a further hearing on the Motion on ______, 2023 at

 _______.m. Central Time (the "Further Hearing").

11. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: _____, 2023

Christopher M. Lopez United States Bankruptcy Judge

4

<u>Exhibit 1</u>

Case Caption	Indemnified Clients	Non-Debtor Affilates	Indemnified D&Os / Employees
<i>Edmo v. Corizon Inc. et al.</i> , No. 1:17-cv-00151-BLW U.S. District Court for the District of Idaho	Idaho Department of Corrections		
N/A (Tort Claim Notice of Alex Scott)	Idaho Department of Corrections		
<i>Lyles v. Papendick et al.</i> , No. 2:19-cv-10673-LJM-KGA U.S. District Court for the Eastern District of Missouri		YesCare Corp. CHS TX, Inc.	
<i>Wolf v. Tewalt, et al.</i> , No. 1:21-cv-00226-BLW U.S. District Court for the District of Idaho	Rona Seigert (Idaho DOC employee)		
Branum v. City of Phoenix, et al, No. 4:21-cv-00357-RM U.S. District Court for the District of Arizona	David Shinn, Arizona DOC Director		
N/A (Tort Claim Notice of Bradley Armstrong)	Idaho Department of Corrections		
Cameron Regional Medical Center, Inc v. Corizon Health, Inc., et al., No. 5:22-cv-6122 U.S. District Court for the Western District of Missouri		YesCare Corp. CHS TX, Inc.	
Belcher v. Tewalt, et al., No. 1:21-cv-00393-BLW U.S. District Court for the District of Idaho	Rona Seigert (Idaho DOC employee)		
Belcher v. Grace, et al., No. 1:22-cv-00256-BLW U.S. District Court for the District of Idaho	Rona Seigert (Idaho DOC employee)		
Curators of the Univ. of Missouri et al. v. Tehum Care Servs., Inc., et al., No. 23-04005 U.S. Bankruptcy Court for the Western District of Missouri (removed from the Circuit Court of Boone County, Mo., Div. 4, No. 22BA-CV01701-01)		YesCare Corp. CHS TX, Inc.	
Capitol Eye Care Inc. v. Tehum Care Services Inc., No. 22AC-CC07354 Circuit Court of Cole County, Missouri		YesCare Corp. CHS TX, Inc.	
Brightly v. Corizon Health Inc., et al., No. 4:21-cv-127-JCH-PSOT U.S. District Court for the District of Arizona	David Shinn, Arizona DOC Director		
Mintun v. Corizon Health Inc., et al., No. 1:21-cv-00124-BLW U.S. District Court for the District of Idaho	Rona Seigert (Idaho DOC employee)		
Stenberg v. Corizon Health, Inc., et al., No. 4:20-cv-10674 U.S. District Court for the Eastern District of Michigan		YesCare Corp. CHS TX, Inc.	Patricia Schmidt
Halo Branded Solutions, Inv. v. Corizon Health Inc., et al., No. 2023LA000124 Circuit Court of 18th Judicial Circuit Court of Illinois		YesCare Corp. CHS TX, Inc.	
Bernstein v. Corizon Health Inc. et al., No. 18PI-CC00022 Circuit Court of Pike County, Missouri	Missouri Department of Corrections		
<i>Hyman v. YesCare Corp. et al.</i> , No. 3:22-cv-01081 U.S. District Court for the Middle District of Tennessee		YesCare Corp. CHS TX, Inc.	Sara Tirschwell, Scott King, Isaac Lefkowitz, Abraham Goldberger, & David Gefner
Wilkinson v. Corizon Medical Services, et al., No. 1:22-cv-00104-REP U.S. District Court for the District of Idaho	Rona Seigert (Idaho DOC employee)		
Snider v. Corizon Medical et al., No. 1:20-cv-648 U.S. District Court for the Western District of Michigan			Patricia Schmidt
<i>Estate of Milkiewicz v. Genesee County et al.</i> , No. 2:17-cv-13047 U.S. District Court for the Eastern District of Michigan	Genesee County		
<i>K.A. et al. v. City of New York et al.</i> , No. 1:16-cv-04936 U.S. District Court for the Southern District of New York	City of New York		Sidney Wilson
Jackson v. Corizon Health Inc. et al., No. 2:19-cv-13382-GAD-PTM U.S. District Court for the Eastern District of Michigan		YesCare Corp. CHS TX, Inc.	
Miotke v. Corizon Health Inc. et al., No. 19-cv-47201 Circuit Court of Oregon, County of Multnoman	Clackamas County		
Stewart v. Ryan et al., No. 2:20-cv-01376-ROS-DMF U.S. District Court for the District of Arizona	Charles Ryan (Arizona DOC Director)		
Maxim Healthcare Staffing Servs., Inc. v. Tehum Care Servs., Inc. et al., No. 3:23-cv-0018 U.S. District Court for the Middle District of Tennessee		YesCare Corp. CHS TX, Inc.	
<i>Chapman v. Dunn et al.</i> , No. 2:20-cv-00007-WKW-CSC U.S. District Court for the Middle District of Alabama	Jefferson Dunn, Ruth Naglich, & Mary Cooks (Alabama DOC employees)		
Schroder v. Johnson, et al., No. 1:21-cv-00106-BLW U.S. District Court for the District of Idaho	Rona Seigert (Idaho DOC employee)		

Case 23-90086 Document 107-1 Filed in TXSB on 03/03/23 Page 6 of 6

Case Caption	Indemnified Clients	Non-Debtor Affilates	Indemnified D&Os / Employees
Schroder v. Zarkoff et al., No. 1:21-cv-00052-BLW U.S. District Court for the District of Idaho	Rona Seigert (Idaho DOC employee)		
Buchanan v. Tehum Care Services, Inc. et al., No. 4:22-cv-01361 U.S. District Court for the Eastern District of Missouri		YesCare Corp. CHS TX, Inc.	
Coleman v. Corizon et al., No. 5:21-cv-13061 U.S. District Court for the Eastern District of Michigan			Patricia Schmidt
<i>Gamez v. United States, et al.</i> , No. 20-16180, 9th Cir. Court of Appeals (on appeal from 2:17-cv-02044-JJT-ESW, U.S. District Court for the District of Arizona)	Charles Ryan & Richard Pratt (Arizona DOC employees)		
Johnson v. Gulick et al., No. 2:20-cv-10147 U.S. District Court for the Eastern District of Michigan			Patricia Schmidt
Blake v. Corizon et al., No. 22-3048, 10th Cir. Court of Appeals (on appeal from 5:21-cv-3140-JAR-ADM, U.S. District Court for the District of Kansas)			Scot Yarnell
Saint Alphonsus Health Sys., Inc. v. Tehum Care Servs., Inc., et al., No. 1:23-cv-00065 U.S. District Court for the District of Idaho		YesCare Corp. CHS TX, Inc.	Sara Tirschwell Scott King
Saint Alphonsus Health Sys., Inc. v. Tehum Care Servs., Inc., et al., No. 1:23-cv-00065 U.S. District Court for the District of Idaho		YesCare Corp. CHS TX, Inc.	
St. Luke's Health System, Ltd et al v. Corizon, LLC et al., No. 1:18-cv-00289-DCN U.S. District Court for the District of Idaho		YesCare Corp. CHS TX, Inc.	
Nelson v. Corizon LLC, et al., No. 8:19-cv-449-CEH-JSS U.S. District Court for the Middle District of Florida	Florida Department of Corrections		
Hasty v. Corizon LLC et al., No. 2:22-cv-04054-SRB U.S. District Court for the Western District of Missouri		YesCare Corp. CHS TX, Inc.	
Kelly v. Corizon Health Inc. et al., No. 2:22-cv-10589-MAG-DRG U.S. District Court for the Eastern District of Michigan		YesCare Corp. CHS TX, Inc.	