

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

In re:	§	Chapter 11
	§	
WELLPATH HOLDINGS, INC., et al.,	§	Case No. 24-90533 (ARP)
	§	
Debtors.	§	(Jointly Administered)
	§	

**VERIFIED RULE 2019 STATEMENT**

Pursuant to Fed. R. Bankr. P. 2019, certain unaffiliated Colorado tort plaintiffs who are creditors of Wellpath, LLC, by and through their undersigned counsel, hereby submit this verified statement, respectfully stating as follows:

1. Background. On or about December 3, 2024, Munsch Hardt Kopf & Harr P.C. (“Munsch Hardt”) was contacted by Anna Holland Edwards, counsel for The Estate of Cristo Canett, through its personal representative, Elizabeth Naranjo, about the possibility of Munsch Hardt representing an ad hoc group of similarly situated Colorado tort plaintiffs in the above-captioned bankruptcy case. Generally speaking, the purpose of seeking joint representation was to pool resources to advance the creditors’ interests both individually and as a group.

2. Membership. The following Colorado tort plaintiffs ultimately retained Munsch Hardt to represent their interests in this bankruptcy case (the “Ad Hoc Group”):

Name	Address	Nature of Claim
ESTATE OF DEZAREE NICOLE ARCHULETA, by and through its personal representative Shelly Romero, and SHELLY ROMERO, individually	c/o Newman McNulty, LLC 1490 Lafayette Street, Suite 304 Denver, CO 80218	Personal injury / wrongful death \$62,000,000.00 Proof of Claim No. 0000011201

Name	Address	Nature of Claim
STUART PATRICK MCLANEY	c/o Newman McNulty, LLC 1490 Lafayette Street, Suite 304 Denver, CO 80218	Personal injury \$6,000,000.00 Proof of Claim No. 0000013584
THE ESTATE OF CRISTO JESUS CANETT, by and through its personal representative Elizabeth Naranjo	c/o Holland, Holland Edwards & Grossman, LLC 1437 High Street Denver, CO 80218	Personal injury / wrongful death \$18,000,000.00 Proof of Claim No. 0000010895
MELISSA LAMMERT	c/o Frank Law Office LLC 1133 N Pennsylvania St. Denver, CO 80203	Personal injury \$1,200,000.00 Proof of Claim No. 0000011186
ESTATE OF CARL MARTIN, by and through its personal representatives Belynn Guerrero and Terry Martin; BELYNN GUERRERO, individually; and TERRY MARTIN, individually	c/o KILLMER LANE, LLP 1543 Champa Street, Suite 400 Denver, Colorado 80202	Personal injury / wrongful death \$20,000,000.00 Proof of Claim Nos. 0000010964, 0000010965, and 0000010966
THE ESTATE OF DANIEL JAMES MURRAY, by and through its personal representative, David Murray	c/o Bagley Law Firm, LLC 215 S. Wadsworth Blvd., Ste. 410 Lakewood, CO 80226	Personal injury / wrongful death \$10,625,000.00 Proof of Claim No. 0000011198
THE ESTATE OF SAVANNAH POPPELL, by and through its personal representative NICOLE POPPELL, and NICOLE POPPELL in her capacity as surviving mother of the decedent, SAVANNAH POPPELL	c/o Gerash Steiner Blanton, P.C. 1775 Sherman St., Suite 1650 Denver, CO 80203	Personal injury / wrongful death \$12,000,000.00 Proof of Claim No. 0000011234

Name	Address	Nature of Claim
THE ESTATE OF ADISON ADAM REED, by and through its personal representative Katharina M. Reed; S.A.D.R., through her Conservator, Katharina M. Reed; W.A.L.R., through his Conservator, Katharina M. Reed	c/o Patricia M. Perello 402 South Weber Street Colorado Springs, CO 80903	Personal injury / wrongful death \$40,000,000.00 Proof of Claim No. 0000011218

3. The information set forth above, which is based on information provided by the applicable members of the Ad Hoc Group to Munsch Hardt, is intended only to comply with Fed. R. Bankr. P. 2019 and is not intended for any other purpose. Munsch Hardt does not make any representation regarding the validity, amount, allowance, or priority of such claims and reserves all rights with respect thereto. Nothing contained in this Verified Statement should be construed as a limitation upon, or waiver of, any rights of the Ad Hoc Group or any member of the Ad Hoc Group, including any right to assert, file and/or amend any claim in accordance with applicable law and any orders entered in these chapter 11 cases.

RESPECTFULLY SUBMITTED this 1st day of April, 2025.

/s/ Julian P. Vasek

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*Counsel for the Ad Hoc Group*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that, on April 1, 2025, true and correct copies of this document were served via CM/ECF on all parties entitled to such notice.

/s/ Julian P. Vasek

Julian P. Vasek