

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

In re:

WELLPATH HOLDINGS, INC., *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 24-90533 (ARP)

(Jointly Administered)

**AGENDA OF MATTERS  
SET FOR HEARING ON APRIL 22, 2025  
AT 2:00 P.M. (PREVAILING CENTRAL TIME)**

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The above-captioned debtors and debtors in possession (collectively, the “Debtors”) file this agenda of matters set for **April 22, 2025, at 2:00 p.m. (Prevailing Central Time)**, before the Honorable Judge Alfredo R. Pérez to consider the following:

**Matters Going Forward**

1. **Motions for Relief from the Automatic Stay Scheduled for April 22, 2025 Hearing.**

Status: Going forward

Related Documents:

- a. Valerie Tobia’s Motion for Relief from Stay [Docket No. 1502] filed by Valerie Tobia, as Personal Representative of the Estate of Joseph Kirk, and on behalf of the Lawful Survivor, to wit: J.K., a Natural Minor Child;
- b. Daichena Thomas’s Motion for Relief from the Stay [Docket No. 1636] filed by Daichena Thomas, individually and as the personal representative of the Estate of Palmer Pearce Joseph Wright, Dana Thomas, individually, Devontay Thomas, individually, Delon Armstrong, individually, Johntae Williams, individually, and Germaine Carmena, individually;

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<sup>1</sup> A complete list of the Debtors (as defined below) in these chapter 11 cases may be obtained on the website of the Debtors’ claims and noticing agent at <https://dm.epiq11.com/Wellpath>. The Debtors’ service address for these chapter 11 cases is 3340 Perimeter Hill Drive, Nashville, Tennessee 37211.

- c. Motion to Modify Claims and Object to Claims of Stay of Claims Under 362 Bankruptcy Mandatory Abstention Provisions Under 28 U.S.C.S § 13342(c)(2) [Docket No. 1648] filed by Robert Adams;
- d. Richard Reichart's Motion Under 11 U.S.C. § 362(d)(1) for Relief from the Automatic Stay to the Extent it is Applicable to Debtor and Non-Debtor Parties [Docket No. 1749] filed by Richard Reichart;
- e. Motion for Relief from Stay [Docket No. 1790] filed by Erik Allen Battersby;
  - i. Objection of Humbolt County, California, to Motion of Erick Allen Battersby for Relief from the Automatic Stay [Docket No. 2040];
- f. Plaintiff Lopez Seeking Leave of Court to Lift Stay Against Non-Bankruptcy Defendants [Docket No. 1851] filed by George Ivan Lopez;
- g. Motion to Lift Stay Against CCS/Wellpath's Current and Past Non-Debtor Employee Defendants and Current and Past Customers and Clients [Docket No. 1986] filed by Charles Zehring;
  - i. Debtors' Limited Response to the Zehring Motion for Relief from the Automatic Stay [Docket No. 2034];
  - ii. Order Partially Modifying the Automatic Stay in the Zehring Action [Docket No. 2060];
- h. Motion to Lift the Stay Against Wellpath's Current and Past Non-Debtor Employee Defendants and Current and Past Customers and Clients [Docket No. 1995] filed by John Floyd;
  - i. Debtors' Limited Response to the Zehring Motion for Relief from the Automatic Stay [Docket No. 2035];
  - ii. Order Partially Modifying the Automatic Stay in the Zehring Action [Docket No. 2061].

2. **Continued Motions for Relief from the Automatic Stay.**

Status: Going forward

Related Matters:

- a. Motion to Lift Stay of Civil Rights Action and Permission to Freeze Debtor(s) Assets [Docket No. 372] filed by Arthur Lamont Henderson;
- b. Motion for Relief from Stay to Proceed with Litigation [Docket No. 1166] filed by Bernard Ferguson;
- c. Motion for Partial Relief from Automatic Stay and Request for Severance of Non-Bankrupt Third Party Defendants [Docket No. 1330] filed by Aquil Johnson;
- d. Pro se Prisoner Motion to Bankruptcy Court to Modify Order of Automatic Stay to Reflect Lifting Stay Against Non-Debtors Anthony Michael Letizio and Pennsylvania Department of Corrections Officials Non-Debtors [Docket No. 1370] filed by Alfonso Percy Pew.

3. **Miscellaneous Matters.**

Status: Going forward

Related Matters:

- a. Letter [Docket No. 1327] filed by Keith Tolbert;
  - i. Status: Resolved.
  - ii. Debtors' Limited Response to the Tolbert Letter Seeking Relief from the Automatic [Docket No. 2092];
  - iii. Order Partially Modifying the Automatic Stay in the Tolbert Appeal [Docket No. 2225];
- b. Motion for Relief from the Automatic Stay [Docket No. 1975] filed by Keith Tolbert;
  - i. Status: Resolved.
  - ii. Debtors' Limited Response to the Tolbert Letter Seeking Relief from the Automatic [Docket No. 2092];

- iii. Order Partially Modifying the Automatic Stay in the Tolbert Appeal [Docket No. 2225];
- c. Motion to Stay These Bankruptcy Proceedings and For an Order to Appoint Counsel to Represent All Un-Represented Incarcerated Inmates [Docket No. 1342] filed by Steven Pinder;
- d. Letter [Docket No. 1496] filed by Frank Highley;
- e. Application to File Third Party Claim in this Bankruptcy Case Against Wellpath Holdings, Inc., the Bankruptcy Noticing Center, Marcus Alan Helt, Esquire, and Epiq Corporate Restructuring LLC for Knowingly Failing to Properly Effectuate Service and Causing Applicant Charles Talbert Emotional Distress [Docket No. 1551] filed by Charles Talbert;
- f. Motion to Enforce Order of December 27, 2024 and to Adjudicate Motions for Injunctive Relief [Docket No. 2132] filed by Charles Talbert;
- g. Motion to Proceed In Forma Pauperis (IFP) and Dismiss the Complaint without Prejudice [Docket No. 1582] filed by Kenneth Pitts;
- h. Motion for 2018 and Rejection Against the Plan, 23 U.S. Sec. 127 [Docket No. 2228] filed by Kenneth Pitts;
- i. Letter [Docket No. 1588] filed by Byron Wallace;
- j. Letter [Docket No. 1637] filed by John Magness;
- k. Letter [Docket No. 1798] filed by John Magness;
- l. Letter [Docket No. 1799] filed by John Magness;
- m. Objections [Docket No. 2042] filed by John Magness;
- n. Crime Victim's Rights Private Victim Testimony (Complaint of Deprivation of/Conspiracy Against Rights & Terrorism) [Docket No. 1640] filed by Robert Curtis Finch;
- o. Motion for Protection of Creditors' Rights [Docket No. 1642] filed by Robert Curtis Finch;

- p. Motion to Stay Proceedings [Docket No. 1643] filed by Alton D. Brown;
- q. Motion to Appoint Counsel [Docket No. 1729] filed by Anthony-Shane Martin;
- r. Motion to Proceed for Relief [Docket No. 1740] filed by James Patton;
- s. Motion for Notice [Docket No. 1742] filed by Cameron J. Braswell;
- t. Motion to Dismiss Bankruptcy Petition [Docket No. 1743] filed by Stanley Donald;
- u. Motion for Notice [Docket No. 1783] filed by Kristin Bayler;
- v. Letter [Docket No. 1784] filed by Kristin Bayler;
- w. Letter by Permission of the Court to Address Mail [Docket No. 1825] filed by Francisco Perez;
- x. Letter by Permission of the Court to Address Mail [Docket No. 1846] filed by Francisco Perez;
- y. Motion for Subpoena to Attend Future Meetings Via Video Conference [Docket No. 1852] filed by Robert Leonard;
- z. Motion for This Court to Rule on Plaintiff's Emergency Temporary Restraining Order [Docket No. 1880] filed by John Floyd;
- aa. Letter [Docket No. 1971] filed by Keenan Wilhite; and
- bb. Motion of Non-Service and/or Motion to Compel [Docket No. 1977] filed by Vern McGinnis Jr.;
- cc. Motion for Temporary Injunction and Extension of Time [Docket No. 2043] filed by Christina De Rossitte;
- dd. Motion for Order Pursuant to Bankruptcy Rule 3018(a) Allowance of Claim for Purpose of Voting to Accept or Reject the Plan [Docket No. 2102] filed by Eric Johnny Adams;

- ee. Motion for Order Pursuant to Bankruptcy Rule 3018(a) Allowance of Claim for Purpose of Voting to Accept or Reject the Plan [Docket No. 2127] filed by Michael Kineard;
- ff. Motion for Entry of Settlement Proffer [Docket No. 2176] filed by Michael Kineard;
- gg. Creditors', Justin Andre Lamoureux and State of Florida, Objection to 3/17/2025 Debtors' Motion for Entry of an Order (I) Approving the Private Sale of Certain of the Debtors' Assets and Equity Interests Free and Clear of Liens, Claims, Interests and Encumbrances, (II) Approving the Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, (III) Dismissing the Chapter 11 Cases of the NBH Sellers, and (IV) Granting Related Relief [Docket No. 2159] filed by Justin Andre Lamoureux;
- hh. Motion to Prohibit or Condition Sale [Docket No. 2160] filed by Justin Andre Lamoureux;
- ii. Motion for Order Pursuant to Bankruptcy Rule 3018(a) Allowance of Claim for Purpose of Voting to Accept or Reject the Plan [Docket No. 2170] filed by John Oliver Jackson;
- jj. Objection to Plan and Declaration of Claims [Docket No. 2171] filed by John Oliver Jackson;
- kk. Rule 3018(a) Motion to Temporarily Allow Claim for Voting Purposes [Docket No. 2182] filed by John P. Jandrew;
- ll. Motion for Relief from Stay [Docket No. 1897] filed by Dr. Kanwar Partap Singh Gill;
  - i. Debtors' Omnibus Objection to the Gill Motions for Relief from Stay and Requesting Related Relief [Docket No. 2262];
- mm. Emergency Motion, Motion to Stay [Docket No. 2049] filed by Dr. Kanwar Partap Singh Gill;
  - i. Debtors' Omnibus Objection to the Gill Motions for Relief from Stay and Requesting Related Relief [Docket No. 2262];

- nn. Emergency Motion, Motion to Strike [Docket No. 2075] filed by Dr. Kanwar Partap Singh Gill;
- i. Debtors' Omnibus Objection to the Gill Motions for Relief from Stay and Requesting Related Relief [Docket No. 2262].

4. **Status Conference.**

Status: Going forward

Related Matters:

- a. Motion for Continuance of Confirmation Hearing [Docket No. 2247] filed by Adam Dewayne Warden;
- b. Motion for Order to Compel Production of Documents [Docket No. 2248] filed by Adam Dewayne Warden;
- c. Motion for Order Pursuant to Bankruptcy Rule 3018(a) Allowance of Claim for Purpose of Voting to Accept or Reject the Plan [Docket No. 2268] filed by Sammy James Douse;
- d. Rule 3018 Motion Disputing Amount of Claim of Unsecured Creditor for Voting Purposes [Docket No. 2269] filed by Benjamin Schenk;
- e. Creditors', Justin Andre Lamoureux and State of Florida, Rule 3018 Motion [Docket No. 2274] filed by Justin Andre Lamoureux.

5. **Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Enter Into Premium Financing Agreement and (II) Granting Related Relief [Docket No. 2033].**

Status: Going forward

Related Matters: None

**PLEASE TAKE FURTHER NOTICE that you may participate in the hearing either in person or by an audio or video connection.** Audio communication will be by use of the Court's dial-in facility. You may access the facility at 1 (832) 917-1510. Once connected, you will be asked to enter the conference room number. Judge Perez's conference room number is 282694. Video communication will be by use of the GoToMeeting platform. Connect via the free GoToMeeting application or click the link on Judge Pérez's home page <https://www.txs.uscourts.gov/page/united-states-bankruptcy-judge-alfredo-r-perez>. The meeting

code is “JudgePerez”. Click the settings icon in the upper right corner and enter your name under the personal information setting.

**PLEASE TAKE FURTHER NOTICE** that hearing appearances must be made electronically in advance of both electronic and in-person hearings. To make your electronic appearance, click the “Electronic Appearance” link on Judge Pérez’s home page. Select the case name, complete the required fields and click “Submit” to complete your appearance.

**PLEASE TAKE FURTHER NOTICE** that all documents filed in these chapter 11 cases are available free of charge by visiting <https://dm.epiq11.com/Wellpath>. Copies of any pleadings or papers filed with the Court may also be obtained by visiting the Court’s website at <https://ecf/txsb.uscourts.gov> in accordance with the procedures and fee set forth therein.

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Dated: April 18, 2025  
Dallas, Texas

*/s/ Marcus A. Helt*

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**CERTIFICATE OF SERVICE**

I certify that on April 18, 2025, 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.

/s/ Marcus A. Helt

Marcus A Helt