

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS —  
HOUSTON DIVISION**

United States Courts  
Southern District of Texas  
FILED  
APR 21 2025  
Nathan Ochsner, Clerk of Court

In re:

WELLPATH HOLDINGS, INC., et al.,  
Debtors.

Case No. 24-90533 (Bankr. S.D. Tex.)  
Chapter 11

Before: The Honorable Alfredo A. Pérez

**EMERGENCY MOTION FOR SANCTIONS AND DISQUALIFICATION  
OF EPIQ CORPORATE RESTRUCTURING, LLC AS NOTICING AGENT**

Filed by:

Dr. Kanwar Partap Singh Gill  
Pro Se Statutory Creditor

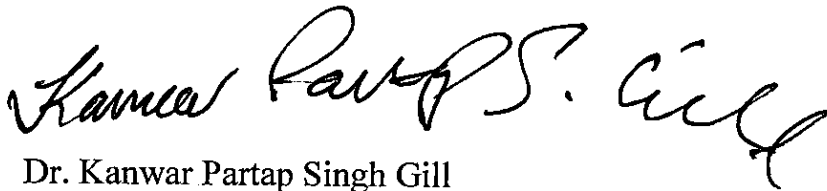
Movant Dr. Kanwar Partap Singh Gill hereby respectfully moves this Court under 11 U.S.C. § 105(a), Bankruptcy Rule 5005, and inherent judicial authority articulated in *Chambers v. NASCO, Inc.*, 501 U.S. 32 (1991), for immediate sanctions against and disqualification of Epiq Corporate Restructuring, LLC ("Epiq") as noticing agent for the following concise and precisely articulated reasons:

1. Epiq has systematically failed to timely docket critical filings, including sworn declarations and evidentiary binders, confirmed as received via verifiable overnight delivery.
2. Epiq's material errors and omissions directly prejudiced Movant's procedural due process rights, evidentiary integrity, and statutory creditor interests.
3. Such conduct evidences severe negligence or intentional obstruction, warranting immediate sanction and disqualification to preserve judicial integrity, procedural fairness, and creditor confidence.

Movant requests the Court:

1. Immediately disqualify Epiq as the official noticing agent for the Debtors;
2. Impose appropriate monetary and corrective sanctions upon Epiq to remediate procedural harms; and
3. Grant further relief as equitable and just.

Respectfully submitted,



Dr. Kanwar Partap Singh Gill

Pro Se Statutory Creditor

Date: April 21, 2025

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