

ENTERED

August 21, 2025

Nathan Ochsner, Clerk

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

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	:	
In re:	:	Chapter 11
	:	
MODIVCARE INC., <i>et al.</i> ,	:	Case No. 25-90309 (ARP)
	:	
Debtors. ¹	:	
	:	(Jointly Administered)
-----	X	

**ORDER (A) AUTHORIZING DEBTORS TO (I) HONOR THEIR PREPETITION
OBLIGATIONS TO CUSTOMERS, AND (II) CONTINUE THEIR CUSTOMER
PROGRAMS; AND (B) GRANTING RELATED RELIEF**

[Relates to Docket No. 17]

Upon the emergency motion (the “*Motion*”)² of the Debtors for entry of an order (this “*Order*”) (a) authorizing, but not directing, the Debtors to (i) fulfill and honor (through payment, credit, setoff, or otherwise) the Customer Programs as they deem appropriate and (ii) continue, enforce, renew, replace, terminate, and implement new Customer Programs and any other customer practices as they deem appropriate, without further application to the Court, and (b) granting related relief, all as more fully set forth in the Motion; and the Court having reviewed the Motion and the First Day Declaration; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. § 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that

¹ A complete list of each of the Debtors in these chapter 11 cases (the “*Chapter 11 Cases*”) and the last four digits of each Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Debtors’ proposed claims and noticing agent at [https:// www.veritaglobal.net/ModivCare](https://www.veritaglobal.net/ModivCare). Debtor ModivCare Inc.’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

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



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venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Motion has been given and that no other or further notice is necessary; and upon the record herein; and after due deliberation thereon; and all objections, if any, to the Motion having been withdrawn, resolved, or overruled; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and the Court having determined that the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors, and other parties in interest, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Debtors are authorized, but not directed, to (a) fulfill and honor (through payment, credit, setoff, or otherwise) all prepetition obligations related to the Customer Programs as they deem appropriate, and (b) continue, enforce, renew, replace, terminate, and implement new Customer Programs and any other customer practices as they deem appropriate, without further application to the Court, including making all payments, honoring all discounts and credits, satisfying all obligations, and permitting and effecting all setoffs in connection therewith, in each case whether related to the prepetition period or the postpetition period.

2. The Banks are authorized to receive, process, honor, and pay any and all checks issued, or to be issued, and electronic funds transfers requested, or to be requested, by the Debtors relating to such obligations set forth herein, to the extent that sufficient funds are on deposit in available funds in the applicable bank accounts to cover such payments. The Banks are authorized to accept and rely on all representations made by the Debtors with respect to which checks, drafts, wires, or automated clearing house transfers should be honored or dishonored in accordance with

this or any other order of this Court, whether such checks, drafts, wires, or transfers are dated prior to, on, or subsequent to the Petition Date, without any duty to inquire otherwise.

3. The Debtors are authorized, but not directed, to issue new postpetition checks, or effect new electronic funds transfers, and to replace any prepetition checks or electronic fund transfer requests that may be lost or dishonored or rejected as a result of the commencement of the Chapter 11 Cases with respect to any prepetition amounts that are authorized to be paid pursuant to this Order.

4. Any party that accepts payment from the Debtors pursuant to this Order is deemed to have voluntarily submitted themselves to the jurisdiction of this Court.

5. The Debtors shall maintain a matrix/schedule of payments, offsets, or credits (collectively, the “*Authorized Payments*”) paid, undertaken, or otherwise effectuated pursuant to this Order, including the following information: (i) the nature, date, and amount of the Authorized Payments; (ii) the Customer Programs to which the Authorized Payments relate; and (iii) the Debtor or Debtors that incurred the Authorized Payments. On the last business day of each month (beginning in September 2025) and ending upon entry of an order confirming a plan or dismissing or converting the Chapter 11 Cases, the Debtors shall provide a copy of such matrix/schedule to the U.S. Trustee, counsel to the First Lien Agent, the Consenting Creditors, and the DIP Lender, and counsel to any statutory committee appointed in the Chapter 11 Cases that discloses the Authorized Payments paid during the prior month.

6. Notwithstanding anything to the contrary contained herein, any payment to be made hereunder, and any authorization contained herein, shall be subject to any interim and final orders, as applicable, approving the use of such cash collateral and/or the Debtors’ entry into any postpetition financing facilities or credit agreements, and any budgets in connection

therewith governing any such postpetition financing and/or use of cash collateral (each such order, a “*DIP Order*”). To the extent there is any inconsistency between the terms of the DIP Order and any action taken or proposed to be taken hereunder, the terms of the DIP Order shall control.

7. Nothing in the Motion or this Order, or any payment made pursuant to this Order, is intended to be or shall be deemed as (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Debtors; (b) a waiver or limitation of the Debtors’ or any other party in interest’s right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Debtors’ or any other party in interest’s rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) a promise or requirement to pay any particular claim; (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; (g) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors’ estates; (h) an admission that any lien satisfied pursuant to this Motion is valid (and all rights to contest the extent, validity, or perfection or seek avoidance of all such liens are expressly reserved); or (i) a request or authorization to assume, adopt, or reject any agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code. Any payment made pursuant to this Order is not intended to be and should not be construed as an admission to the validity of any claim or waiver of the Debtors’ or any other party in interest’s rights to dispute such claim subsequently. Further, nothing contained in the Motion or this Order is intended or should be construed to convert a prepetition claim into an administrative expense priority claim on account of any claims arising under or relating to the Customer Programs.

8. Nothing in the Motion or this Order shall be construed as: (i) prejudicing any rights the Debtors or any other party in interest may have to dispute or contest the amount of or basis for any claims asserted against the Debtors in connection with any Customer Programs; (ii) creating or perfecting, in favor of any person or entity, any interest in cash belonging to any of the Debtors that did not exist as of the Petition Date; (iii) altering or impairing any security interest or perfection thereof, in favor of any person or entity, that existed as of the Petition Date; nor (iv) authorizing or directing the acceleration of any payment not otherwise due.

9. The requirements set forth in Bankruptcy Rule 6003(b) are satisfied.

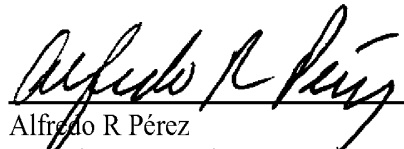
10. Notice of the Motion is adequate under Bankruptcy Rule 6004(a) and the Bankruptcy Local Rules.

11. Notwithstanding Bankruptcy Rule 6004(h), to the extent applicable, this Order shall be effective and enforceable immediately upon entry hereof.

12. The Debtors are authorized and empowered to take all actions necessary or appropriate to implement the relief granted in this Order.

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

Signed: August 21, 2025


Alfredo R Pérez
United States Bankruptcy Judge

United States Bankruptcy Court
Southern District of Texas

In re:
ModivCare Inc.
Debtor

Case No. 25-90309-arp
Chapter 11

CERTIFICATE OF NOTICE

District/off: 0541-4
Date Rcvd: Aug 21, 2025

User: ADIuser
Form ID: pdf002

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Total Noticed: 10

The following symbols are used throughout this certificate:

Symbol	Definition
+	Addresses marked '+' were corrected by inserting the ZIP, adding the last four digits to complete the zip +4, or replacing an incorrect ZIP. USPS regulations require that automation-compatible mail display the correct ZIP.

Notice by first class mail was sent to the following persons/entities by the Bankruptcy Noticing Center on Aug 23, 2025:

Recip ID	Recipient Name and Address
db	+ ModivCare Inc., 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, CO 80237-3656

TOTAL: 1

Notice by electronic transmission was sent to the following persons/entities by the Bankruptcy Noticing Center.

Electronic transmission includes sending notices via email (Email/text and Email/PDF), and electronic data interchange (EDI). Electronic transmission is in Eastern Standard Time.

Recip ID	Notice Type: Email Address	Date/Time	Recipient Name and Address
cr	+ Email/Text: julie.parsons@mvalaw.com	Aug 21 2025 20:46:00	Burnet Central Appraisal District, c/o McCreary, Veselka, Bragg & Allen, P.O. Box 1269, Round Rock, TX 78680-1269
cr	+ Email/Text: julie.parsons@mvalaw.com	Aug 21 2025 20:46:00	Central Appraisal District of Taylor County, c/o Julie Parsons, P.O. Box 1269, Round Rock, TX 78680-1269
cr	Email/Text: julie.parsons@mvalaw.com	Aug 21 2025 20:46:00	County of Erath, c/o McCreary, Veselka, Bragg & Allen, P.O. Box 1269, Round Rock, TX 78680-1269
op	+ Email/Text: kecnoticing@kccllc.com	Aug 21 2025 20:47:00	Kurtzman Carson Consultants, LLC d/b/a Verita Glob, 222 N. Pacific Coast Highway, Suite 300, El Segundo, CA 90245-5614
cr	Email/Text: julie.parsons@mvalaw.com	Aug 21 2025 20:46:00	Reeves County Tax District, c/o McCreary, Veselka, Bragg & Allen, P.O. Box 1269, Round Rock, TX 78680-1269
cr	Email/Text: julie.parsons@mvalaw.com	Aug 21 2025 20:46:00	The County of Brazos, Texas, McCreary Veselka Bragg & Allen, PC, Attn: Julie Anne Parsons, PO Box 1269, Round Rock, TX 78680-1269
cr	Email/Text: julie.parsons@mvalaw.com	Aug 21 2025 20:46:00	The County of Comal, Texas, McCreary Veselka Bragg & Allen, PC, Attn: Julie Anne Parsons, PO Box 1269, Round Rock, TX 78680-1269
cr	Email/Text: julie.parsons@mvalaw.com	Aug 21 2025 20:46:00	The County of Denton, Texas, McCreary Veselka Bragg & Allen, PC, Attn: Julie Anne Parsons, PO Box 1269, Round Rock, TX 78680-1269
cr	Email/Text: julie.parsons@mvalaw.com	Aug 21 2025 20:46:00	The County of Hays, Texas, c/o McCreary, Veselka, Bragg & Allen, P.O. Box 1269, Round Rock, TX 78680-1269

TOTAL: 9

BYPASSED RECIPIENTS

The following addresses were not sent this bankruptcy notice due to an undeliverable address, *duplicate of an address listed above, *P duplicate of a preferred address, or ## out of date forwarding orders with USPS.

Recip ID	Bypass Reason	Name and Address
cr		First Lien Agent and Consenting Creditors
cr		Wilmington Savings Fund Society, FSB

TOTAL: 2 Undeliverable, 0 Duplicate, 0 Out of date forwarding address

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NOTICE CERTIFICATION

I, Gustava Winters, declare under the penalty of perjury that I have sent the attached document to the above listed entities in the manner shown, and prepared the Certificate of Notice and that it is true and correct to the best of my information and belief.

Meeting of Creditor Notices only (Official Form 309): Pursuant to Fed .R. Bank. P.2002(a)(1), a notice containing the complete Social Security Number (SSN) of the debtor(s) was furnished to all parties listed. This official court copy contains the redacted SSN as required by the bankruptcy rules and the Judiciary's privacy policies.

Date: Aug 23, 2025

Signature: /s/Gustava Winters

CM/ECF NOTICE OF ELECTRONIC FILING

The following persons/entities were sent notice through the court's CM/ECF electronic mail (Email) system on August 21, 2025 at the address(es) listed below:

Name	Email Address
Emma Fleming	on behalf of Creditor Wilmington Savings Fund Society FSB efleming@winston.com, ecf_houston@winston.com;emma--fleming-0126@ecf.pacerpro.com
Evan Gershbein	on behalf of Other Prof. Kurtzman Carson Consultants LLC d/b/a Verita Global ECFpleadings@kccllc.com, ECFpleadings@kccllc.com
Jana Smith Whitworth	on behalf of U.S. Trustee US Trustee jana.whitworth@usdoj.gov
Julie Anne Parsons	on behalf of Creditor The County of Hays Texas jparsons@mvbalaw.com, vcovington@mvbalaw.com;kalexander@mvbalaw.com;julie.parsons@ecf.courtdrive.com
Julie Anne Parsons	on behalf of Creditor County of Erath jparsons@mvbalaw.com vcovington@mvbalaw.com;kalexander@mvbalaw.com;julie.parsons@ecf.courtdrive.com
Julie Anne Parsons	on behalf of Creditor The County of Denton Texas jparsons@mvbalaw.com, vcovington@mvbalaw.com;kalexander@mvbalaw.com;julie.parsons@ecf.courtdrive.com
Julie Anne Parsons	on behalf of Creditor The County of Comal Texas jparsons@mvbalaw.com, vcovington@mvbalaw.com;kalexander@mvbalaw.com;julie.parsons@ecf.courtdrive.com
Julie Anne Parsons	on behalf of Creditor Reeves County Tax District jparsons@mvbalaw.com vcovington@mvbalaw.com;kalexander@mvbalaw.com;julie.parsons@ecf.courtdrive.com
Julie Anne Parsons	on behalf of Creditor The County of Brazos Texas jparsons@mvbalaw.com, vcovington@mvbalaw.com;kalexander@mvbalaw.com;julie.parsons@ecf.courtdrive.com
Julie Anne Parsons	on behalf of Creditor Central Appraisal District of Taylor County jparsons@mvbalaw.com vcovington@mvbalaw.com;kalexander@mvbalaw.com;julie.parsons@ecf.courtdrive.com
Julie Anne Parsons	on behalf of Creditor Burnet Central Appraisal District jparsons@mvbalaw.com vcovington@mvbalaw.com;kalexander@mvbalaw.com;julie.parsons@ecf.courtdrive.com
Kaleb Bailey	on behalf of Debtor ModivCare Inc. kbailey@hunton.com
Matthew L Warren	on behalf of Creditor First Lien Agent and Consenting Creditors mattwarren@paulhastings.com modivcare_ecf_ph@paulhastings.com
Timothy Alvin Davidson, II	on behalf of Debtor Healthcom Holdings LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	

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	on behalf of Debtor Socrates Health Holdings LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Multicultural Home Care Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Ride Plus LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor National MedTrans LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Circulation Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Florida MedTrans Network LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor CareGivers America Home Health Services LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Red Top Transportation Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor CareGivers America Medical Staffing LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor ARU Hospice Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor All Metro Home Care Services of New York Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor CareGivers America Registry LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor All Metro Aids Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor CGA Holdco Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor All Metro Field Service Workers Payroll Services Corporation taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor CareGivers America Medical Supply LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Union Home Care LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Helping Hand Home Health Care Agency Inc taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor All Metro Payroll Services Corporation taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Higi Care LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Secura Home Health LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Care Finders Total Care LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor CareGivers Alliance LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor VRI Intermediate Holdings LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Caregivers On Call Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor All Metro Health Care Services Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor ModivCare Solutions LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Safe Living Technologies LLC taddavidson@hunton.com

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Timothy Alvin Davidson, II	on behalf of Debtor OEP AM Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Metropolitan Medical Transportation IPA LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor California MedTrans Network MSO LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Victory Health Holdings LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor At-Home Quality Care LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Auditory Response Systems Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Barney's Medical Alert-ERS Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Florida MedTrans Network MSO LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor CGA Staffing Services LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Personal In-Home Services Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Health Trans Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Independence Healthcare Corporation taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor AM Holdco Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Philadelphia Home Care Agency Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor MLA Sales LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Caregivers America LLC. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Provado Technologies LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor A & B Homecare Solutions L.L.C. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Helping Hand Hospice Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor All Metro Home Care Services of Florida Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor All Metro Home Care Services Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor All Metro CGA Payroll Services Corporation taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor A.E. Medical Alert Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Guardian Medical Monitoring LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Higi Care Holdings LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor ABC Homecare LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Panhandle Support Services Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor New England Emergency Response Systems Inc. taddavidson@hunton.com

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Timothy Alvin Davidson, II	on behalf of Debtor Arsens Home Care Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Associated Home Services Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor All Metro Management and Payroll Services Corporation taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor All Metro Home Care Services of New Jersey Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor All Metro Associate Payroll Services Corporation taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor TriMed LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Healthcom Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Secura Home Health Holdings Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Valued Relationships Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor ModivCare Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Higi SH LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor AM Intermediate Holdco Inc. taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor California MedTrans Network IPA LLC taddavidson@hunton.com
Timothy Alvin Davidson, II	on behalf of Debtor Higi SH Holdings Inc. taddavidson@hunton.com
US Trustee	USTPRegion07.HU.ECF@USDOJ.GOV

TOTAL: 85