

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

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

**SUPPLEMENTAL DECLARATION OF CHAD J. SHANDLER
IN SUPPORT OF THE APPLICATION OF DEBTORS FOR ENTRY
OF AN ORDER (A) AUTHORIZING THE DEBTORS TO (I) EMPLOY AND
RETAIN FTI CONSULTING, INC. AS FINANCIAL ADVISOR, (II) DESIGNATE
CHAD J. SHANDLER TO SERVE AS CHIEF TRANSFORMATION OFFICER,
AND (III) PROVIDE ADDITIONAL PERSONNEL FOR DEBTORS
EFFECTIVE AS OF THE PETITION DATE; AND (B) GRANTING RELATED RELIEF**

Pursuant to 28 U.S.C. section 1746, Chad J. Shandler, declares as follows:

1. I am a senior managing director at FTI Consulting, Inc. (“*FTI*”), which maintains offices at various locations around the country, including 1166 6th Avenue, 15th Floor, New York, New York 10036. I submit this declaration (the “*Supplemental Declaration*”) to supplement my original declaration (“*Original Declaration*”) that was submitted in connection with FTI’s retention application in these chapter 11 cases (the “*Application*”). For the avoidance of doubt, this Supplemental Declaration adds additional information and disclosures but does not supersede the disclosures or connections set forth in the Application and Original Declaration unless expressly stated otherwise herein.

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’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Debtor ModivCare Inc.’s principal place of business and the Debtors’ service address in the Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.



2. Since the filing of the Original Declaration, additional potential parties in interest have been identified and are set forth on **Schedule 1** to this Supplemental Declaration (the “*Supplemental List of Potential Parties in Interest*”). In accordance with the procedures described in in the Original Declaration, FTI again queried the parties on Supplemental List of Potential Parties in Interest within its internal computer database² containing names of individuals and entities that are present or recent former clients of FTI. A summary of such relationships that FTI identified during this process is set forth on **Schedule 2** to this Declaration (the “*Client Match List*”).

3. In addition to the disclosures on Schedule 2, FTI discloses the following:

- It is my understanding that American Express is a vendor of the Debtors. Upon information and belief, American Express is an affiliate of the American Express Company. Laureen E. Seeger, a member of the board of directors of FTI Consulting, Inc., is currently chief legal officer of the American Express Company. To the best of my knowledge, Ms. Seeger does not have any professional involvement in this matter in any capacity.

4. Based on the results of its review, FTI does not have a relationship with any of the parties listed on the Supplemental List of Potential Parties in Interest in matters related to the Debtors or the Chapter 11 Cases. FTI has provided and could reasonably be expected to continue to provide services unrelated to the Debtors or the Chapter 11 Cases for the various entities listed on the Client Match List. FTI’s assistance to these parties has been related to providing various financial restructuring, litigation support, technology, strategic communications, and economic consulting services. To the best of my knowledge, no services have been provided to these parties in interest that involve their rights in the Chapter 11 Cases, nor does FTI’s involvement in this case compromise its ability to continue such consulting services.

² For the avoidance of doubt, FTI’s computer database covers FTI Consulting, Inc. and its wholly-owned subsidiaries globally.

5. Insofar as I have been able to ascertain and subject to the disclosures herein and in the Original Declaration, FTI (i) is a “disinterested person” as defined in Bankruptcy Code section 101(14) and (ii) neither holds nor represents an interest adverse to the Debtors or their estates. Therefore, I believe that FTI remains eligible to represent the Debtors under Bankruptcy Code section 327(a).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: November 26, 2025

/s/ Chad J. Shandler

Chad J. Shandler

Schedule 1¹

Supplemental List of Potential Parties in Interest

Prior Debtor Names

At-Home Quality Care, LLC (f/k/a At-Home Quality Care, Inc.)
Secura Home Health Holdings, Inc. (f/k/a Hearts ay Home Holdings, Inc.)
Secura Home Health, LLC (f/k/a Hearts at Home, LLC)

Non-Debtor Affiliates

ARUBU, Inc.
Medtrans Network IPA, LLC

Top 30 Unsecured Creditors

Best Neighbor Transportation LLC
Homecare Software Solutions LLC
Metro One Ambulance Inc.
PNP Group LLC
Sunshine State Health Plan Inc.
United Healthcare Services Inc
Wilmington Savings Fund Society, FSB

Banking Parties

Imperial Bank of Canada
State Employees' Credit Union
Guggenheim Securities, LLC
State Employees' Credit Union
First Citizens Bank & Trust Company

Directors and Officers

Alec Cunningham
Anne Bailey
Barbara Gutierrez
Carolyn McCarthy
Chris Echols
Chris Shackelton
Damon Green

Daniel. B Silvers
David Coulter
David Mounts Gonzales
Erin Russell
Francis Jackson Wright
Garth Graham
Ilias Simpson
James Watson
Jaron Ross
Jennifer Jaskolka
Jonathan Bush
Mia Haney
Neal Goldman
Rahul Digamber Samant

Debtors' Restructuring and Other Significant Professionals

Hunton Andrews Kurth LLP
Kurtzman Carson Consultants, LLC (d/b/a Verita Global)
Quinn Emmanuel Urquhart & Sullivan LLP
Cresa, LLC
Mills Halstead & Zaloudek, LLC

Professionals to Other Major Stakeholders

Breslin, Young & Slaughter, LLC
AlixPartners LLP
White & Case LLP

Insurance Parties

Berkeley Specialty Insurance
Endurance American Specialty Insurance Company
ESIS, Inc.

¹ This Schedule (and the categories contained herein) are for purposes of a conflicts check only and should not be relied upon by any party as a list of creditors or for any other purpose. The Debtors' professionals have attempted to remove duplicate entries where possible. Accordingly, a party that otherwise would fall under multiple categories is likely to be listed under only one category. Additionally, certain of the Debtors' debt obligations may be held by more than one affiliated entity within the same financial institution. Where the affiliation of such entities is obvious based on their names, only one entity is included herein.

Fairmatic (SiriusPoint Specialty Insurance Company)
Landmark American Insurance Company (R-T Specialty)

Litigation Parties

Lisa Sallaj
Christopher Skrypski
Adrienne Reed
Alexa Morales
Alexis Jones
American Ground Transportation
Andrea Hinson Deangelo Davis
Angel Perez
Arthur Owens
Asanta S. Buxton
Brandy Curtis
Brent Johnson
Brittnee Harris
Camecise Metellus
Carla Williams
Chereda Ivory
Christopher Smith
Clemmie Williams
Coolyn Turner
Cynthia Breece
Dale Fitz
Danny Evans
Daryl Stokes
David Pulsifer
David T. Patterson
Debbie Marie Howard
Debra Burden
Debra Chabert
Debra Jones
Denise Avalos
Denzell Carswell
Dexter Sias
Diana Claudio
Dianna Guinyard
Dominick Viti
Donna Mae Totty
Douglas Selby
Easter Lyons
Edwin Barroso-Perez
Elaine Bowdoin

Elizabeth Hernandez Herrera
Ellen Pilley
Ellen Reyes
Fatima Zhindon
Frances Douglas
Gabriella Arcena de Los Santos
Geraldine Nixon Ford
Geraldine Orr
Gwendolyn Mobley
Heather Swick
Helen D. Walker
Hope Sadler
Ida Williams
Instant Transportation LLC
Jacqueline Sistrunk
James A. Bates
James Oliver Stephens
James Perez
Jayeson Henry
Jeffrey Harris
Jessie Love
Jhovanna Parker
Jimmy Smith
Jorge Furcoy
Karen Walters
Kenyatta Godwin
Law Offices of David M. Gaspari, P.A
Lea'Cimmone Briggs
Lewis Hagar
Lewis S. Glass
Linda Gant
Mae Robertson
Maria J. Camacho Pineda
Mariann Schroeder
Marquis Hines
Marthe Paul
Martin Luque
Maryann Ortega
Michael Mavrovitis
Modest Keltrick
Moiria Sandrock
Nhi Ngu
Nicholas Garza
Nilsa Torres
Norman Fishbein
Orlando Clark

Pennsylvania Human Relations Commission
Qadriyyah Hill
Rachel Corbett
Raphael Crawford
Reading Metro, LLC
Robert Klebetz
Robert L. Freidman
Robert Smith
Roberta Gwin
Rodrick Hackworth
Ronald Hines
Ronnie Hunt
Ruth Oliver
Ryan Martin
Sadie Donnell
Sadie Donnell Christopher Smith
Sally Triano
Sandra Padilla Hernandez
Santa Guerrero
Seini Ika
SeniorCare Emergency Medical Services,
Inc.
Shabana Hafiz
Shauntalay McClendon
Shawn Meadows
Shooshanik Charkhchian
Sonya Ross
Stacie Rogers
Sufunda Samuel
Suzanne Betts
Suzie Plumaj
Terence White
Terrence Cora
Theresa Henry
Theresa Lyons
Tina Hager
Trinidad De La Cruz
Veda Roberson
Vincent Staley
Willard McClam
Willie Cromartie
Zane Whitfield

Major Customers

Arkansas Department of Human Services
Office of Procurement

Commonwealth of Virginia Department of
Medical Assistance Services
Humana Medical Plan
Sentara Health Administration
South Carolina Department of Health and
Human Services
State of Delaware, Department of Health
and Social Services
The Georgia Department of Community
Health
The State of Maine, Department of Health
and Human Services
The State of New Jersey, Division of
Medical Assistance and Health Services
The West Virginia Bureau for Medical
Services
United Health Care Insurance Company

Major Equity Holders

Barrow, Hanley, Mewhinney & Strauss LLC
AI Catalyst Fund, LP
Aristotle Capital Boston, LLC
Coliseum Capital Management, LLC
D.E. Shaw & Co
Scepter Holdings, Inc.
SSGA Active Trust
The Vanguard Group, Inc.

Major Supplier/Vendor

Anybill



MedEx Medical Transport Service, Inc.

Notice of Appearance Parties

Lifestar Response of Maryland, Inc.
Oklahoma County Treasurer
Peggy Aaron
Texas Comptroller of Public Accounts,
Revenue Accounting Division

Ordinary Course Professionals

Bradley Arant Boulton Cummings LLP

Kelley Consulting
Polsinelli PC
PricewaterhouseCoopers LLP/PwC
Hinman Straub Advisors
Montana Group, LTD
Schellman & Company, LLC
Schellman Compliance, LLC
Stevens & Lee P.C.
The Southern Group of South Carolina
2005, LLC
Willcox Savage Consulting LLC
Willcox Savage PC
Willoughby Humphrey & D'Antoni PA

Potential Investors

[REDACTED]

**Trustees, Agents, Secured Lenders
(including certain Bond Holders), and
Other Potential Lienholders**

Ankura Trust Company, LLC
Bank of America, N.A.
Barclays Bank PLC
BNP Paribas S.A.
Chilmark Partners, LLC
CIBC Bank USA
Comerica Bank
FIAM LLC an affiliate of Fidelity
Investments
HalseyPoint Asset Management, LLC
Hewlett-Packard Financial Services
Company
HSBC Bank PLC
Jupiter Asset Management
Madison Avenue International LP
Metropolitan West Asset Management
Polar Asset Management Partners Inc.

PrivateBank and Trust Company
Q5-R5 Trading, LTD.
Silver Rock Financial LP
Silver Rock Management LLC
Summit House Capital Management, LLC
TCW Asset Management Company
U.S. Bank Equipment Finance
Wilmington Trust
WSFE Bank
CSS, LLC
Allspring Global Investments
Newfleet Asset Management
Saba Capital Management
Thrivent Asset Management
Virtus Fixed Income Advisers LLC

Utilities

11:11 Systems, Inc.
8x8 Inc
American Electric Power
AT&T
AT&T Mobility
Bandwidth Inc.
Charter Communications
Cogent Communications, LLC
Cologix
Comcast
Commonwealth Edison Company
Corning Natural Gas Corp
Cox Communications Arizona, LLC
Dialpad Inc.
Frontier Communications
International Telcom, LLC
Level 3 Communications LLC
MASERGY Communications, Inc.
Mountaineer Gas Company
PacketFabric Inc
Sangoma US Inc.
The Southern Connecticut Gas Company
T-Mobile Usa Inc
Verizon Communications Inc.
Windstream

Vendors

ACE USA

Alchemy Technology Group LLC
American Express
Duricare Inc
Freeus, LLC

Ibex Global Solutions
Northeast Treatment Centers
Salesforce.Com Inc
Workday Inc

Schedule 2

Client Match List

Relationships in Matters Related to These Proceedings

None.

Relationships in Unrelated Matters - Current

Top 30 Unsecured Creditors

United Healthcare Services Inc
Wilmington Savings Fund Society, FSB

Banking Parties

Imperial Bank of Canada
Guggenheim Securities, LLC

Debtors' Restructuring Professionals

Hunton Andrews Kurth LLP
Quinn Emmanuel Urquhart & Sullivan LLP

Equipment Lessor/Banking Party

First Citizens Bank & Trust Company

Insurance Parties

Fairmatic (SiriusPoint Specialty Insurance Company)
Landmark American Insurance Company (R-T Specialty)

Litigation Parties

Instant Transportation LLC
SeniorCare Emergency Medical Services, Inc.

Major Customers

Humana Medical Plan
United Health Care Insurance Company

Major Equity Holders

D.E. Shaw & Co
The Vanguard Group, Inc.

Major Supplier/Vendor

Anybill

Ordinary Course Professionals

Bradley Arant Boult Cummings LLP
Polsinelli PC
PricewaterhouseCoopers LLP
Stevens & Lee P.C.

Potential Investors

Banco Santander
Blue Torch Capital LP
Crystal Financial LLC d/b/a SLR Credit Solutions

Trustees, Agents, Secured Lenders (including certain Bond Holders), and Other Potential Lienholders

Bank of America, N.A.
Barclays Bank PLC
BNP Paribas S.A.
Comerica Bank
HSBC Bank PLC
Polar Asset Management Partners Inc.
Silver Rock Financial LP
TCW Asset Management Company
Wilmington Trust
Saba Capital Management

Professionals to Other Major Stakeholders

AlixPartners LLP
White & Case LLP

Utilities

American Electric Power
AT&T
AT&T Mobility
Charter Communications

Comcast
Frontier Communications
Level 3 Communications LLC
Mountaineer Gas Company
T-Mobile Usa Inc
Verizon Communications Inc.

Vendors

American Express
Salesforce.Com Inc.
Workday Inc.

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Relationships in Unrelated Matters - Former

Top 30 Unsecured

Sunshine State Health Plan Inc.

Potential Investors

MidCap Financial Trust

Sound Point Capital Management, LP

Trustees, Agents, Secured Lenders (including certain Bond Holders), and Other Potential Lienholders

Jupiter Asset Management

Utilities

Cogent Communications, LLC

The Southern Connecticut Gas Company

Windstream