

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

In re:

MODIVCARE, INC., *et al.*,

Debtors.

Chapter 11

Case No. 25-90309 (ARP)

(Jointly Administered)

**HEALTHSPRING, INC.'S MOTION TO SEAL OBJECTION OF HEALTHSPRING,
INC. TO DEBTORS' MOTION FOR AN ENTRY OF AN ORDER AUTHORIZING THE
DEBTORS TO REJECT CERTAIN EXECUTORY CONTRACTS [DOCKET NO. 1133]
AND SUPPORTING DECLARATIONS AND EXHIBITS**

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at <https://ecf.txsb.uscourts.gov/> within twenty-one days from the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

TO THE HONORABLE ALFREDO R. PEREZ,
UNITED STATES BANKRUPTCY JUDGE:

HealthSpring, Inc., as assignee of Health Care Service Corporation/Cigna Corporate Services LLC (“HealthSpring”), by undersigned counsel, hereby moves and respectfully states as follows in support of this motion (“Motion”).

RELIEF REQUESTED

1. HealthSpring files this Motion to request entry of an order, substantially in the form attached hereto (the “Proposed Order”), authorizing the Debtors to: (i) file a redacted versions of the Objection of HealthSpring, Inc. to Debtor’s Motion for an Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts [Docket No. 1133] (“Objection”) along with the supporting declarations and exhibits because the redacted portions of the Objection, declarations and exhibits contain commercially-sensitive information; and (ii) to file under seal an unredacted



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version of the Objection, declarations and exhibits, which shall remain confidential and under seal and not made available to anyone without the consent of HealthSpring or further order of this Court.

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the Southern District of Texas (the “Court”) has jurisdiction to consider the Motion under 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b) and the Court may enter a final order consistent with Article III of the United States Constitution. Venue is proper under 28 U.S.C. §§ 1408 and 1409.

3. The bases for the relief requested herein are sections 105(a) and 107(b) of title 11 of the United States Code (the “Bankruptcy Code”), rule 9018 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and rules 9013-1 and 9037-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “Bankruptcy Local Rules”), and the Procedures for Complex Cases in the Southern District of Texas.

BASIS FOR RELIEF

4. On January 20, 2026, HealthSpring filed the Motion.

5. The relief requested herein is supported by sections 105(a) and 107(b) of the Bankruptcy Code. Specifically, under section 107(b) of the Bankruptcy Code, the Court is authorized to issue orders to protect entities with respect to certain confidential or commercially-sensitive information. 11 U.S.C. § 107(b). Further, section 105(a) of the Bankruptcy Code, which codifies the Court’s inherent equitable powers, empowers the Court to “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of this title.” 11 U.S.C. § 105(a).

6. Bankruptcy Rule 9018 implements section 107(b) of the Bankruptcy Code and

provides in relevant part: “On motion or on its own initiative, with or without notice, the court may make any order which justice requires (1) to protect the estate or any entity in respect of a trade secret or other confidential research, development, or commercial information, (2) to protect any entity against scandalous or defamatory matter contained in any paper filed in a case under the [Bankruptcy] Code[.]” Fed. R. Bankr. P. 9018. Furthermore, Bankruptcy Local Rule 9037-1 authorizes the Court to limit public access to certain documents.

7. Here, the Objection and supporting declarations and exhibits contain commercially sensitive information regarding HealthSpring’s and the Debtors’ business operations, which could potentially be used by competitors of HealthSpring or the Debtors to gain an unfair advantage in markets where HealthSpring and the Debtors operate.

8. In light of the foregoing, the HealthSpring asks the Court for authority to: (i) file redacted versions of the Objection and supporting declarations and exhibits; and (ii) file unredacted versions of the Objection and supporting declarations and exhibits under seal.

WHEREFORE, HealthSpring respectfully requests that the Court enter the Proposed Order granting the relief requested in the Motion and such other and further relief as may be just and proper.

Dated: January 20, 2026.

Respectfully submitted,

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ATTORNEYS FOR HEALTHSPRING, INC.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 20, 2026, the foregoing was served electronically via CM/ECF for those parties registered to receive such service.

/s/ Erin E. Jones

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HOUSTON DIVISION**

In re:

MODIVCARE, INC., *et al.*,

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Case No. 25-90309 (ARP)

(Jointly Administered)

**ORDER GRANTING HEALTHSPRING, INC.’S MOTION TO SEAL OBJECTION OF
HEALTHSPRING, INC. TO DEBTORS’ MOTION FOR AN ENTRY OF AN ORDER
AUTHORIZING THE DEBTORS TO REJECT CERTAIN EXECUTORY CONTRACTS
[DOCKET NO. 1133] AND SUPPORTING DECLARATIONS AND EXHIBITS**

[Relates to Docket No.]

Upon consideration of HealthSpring, Inc.’s Motion to Seal Objection of HealthSpring, Inc. to Debtor’s Motion for an Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts [Docket No. 1133] and Supporting Declarations and Exhibits (“Motion”), and upon all of the proceedings had before this Court, is hereby.

ORDERED THAT:

1. HealthSpring, Inc. (“HealthSpring”) is authorized to asks the Court for authority to file unredacted versions of the Objection of HealthSpring, Inc. to Debtor’s Motion for an Entry of an Order Authorizing the Debtors to Reject Certain Executory Contracts [Docket No. 1133] (“Objection”) along with the supporting declarations and exhibits under seal.
2. The unredacted Objection and supporting declarations and exhibits shall remain confidential and under seal, and shall not be made available to anyone without the consent of HealthSpring or further order of the Court.
3. HealthSpring is authorized to file redacted versions of the Objection and supporting declarations and exhibits.

4. HealthSpring is hereby authorized to take all actions necessary to effectuate the relief granted in this Order.

5. This Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: _____

UNITED STATES BANKRUPTCY JUDGE