

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

----- X
 In re: : Chapter 11
 :
 MODIVCARE INC., *et al.*, : Case 25-90309 (ARP)
 :
 Reorganized Debtors.¹ : (Jointly Administered)
 :
 ----- X

**MOTION OF REORGANIZED DEBTORS FOR ENTRY OF AN ORDER:
(A) APPROVING PROCEDURES FOR REORGANIZED DEBTORS’ FILING
OF OMNIBUS CLAIMS OBJECTIONS; (B) THE FORM OF OBJECTION NOTICE;
AND (C) GRANTING RELATED RELIEF**

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.

The above-captioned reorganized debtors (prior to the Effective Date,² collectively, the “*Debtors*” and after the Effective Date, collectively, the “*Reorganized Debtors*”) respectfully state the following in support of this motion (this “*Motion*”).

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

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the First Day Declaration (as defined below) or the *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates* [Docket No. 1055, Ex. A] (together with all supplemental or supporting documentation related thereto, the “*Plan*”), as applicable.

RELIEF REQUESTED

1. By this Motion, the Reorganized Debtors seek entry of an order (the “***Proposed Order***”), substantially in the form attached hereto, (a) approving the proposed procedures for filing omnibus claims objections (each, an “***Omnibus Objection***”) attached to the Proposed Order as **Exhibit 1** (the “***Objection Procedures***”), (b) the form of the notice provided to affected Holders by each Omnibus Objection, substantially in the form attached to the Proposed Order as **Exhibit 2** (the “***Objection Notice***”);³ and (c) granting related relief.

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the Southern District of Texas (the “***Court***”) has jurisdiction to consider this 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.

3. Venue of the Chapter 11 Cases and this Motion in this district is proper under 28 U.S.C. §§ 1408 and 1409.

4. The statutory and legal predicates for the relief requested herein are sections 105(a) and 502(a) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “***Bankruptcy Code***”), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the “***Bankruptcy Rules***”), Rules 3007-1 and 9013-1 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 (the “***Complex Case Procedures***”).

³ While each Objection Notice will generally be in the form attached to the Proposed Order, such form may be modified to address issues specific to the particular Omnibus Objection, as necessary and appropriate.

BACKGROUND

5. On August 20, 2025, the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Chapter 11 Cases are being jointly administered for procedural purposes only pursuant to Rule 1015(b) of the Bankruptcy Rules and Rule 1015-1 of the Bankruptcy Local Rules. The factual background regarding the Debtors, including their business, their capital structure, and the events leading to the commencement of the Chapter 11 Cases is set forth in the *Declaration of Chad J. Shandler in Support of Chapter 11 Petitions and First Day Relief* [Docket No. 14] (the “**First Day Declaration**”).

6. On December 15, 2025, the Court entered an order [Docket No. 1055] (the “**Confirmation Order**”) which, among other things, confirmed the Plan. The Effective Date occurred on December 29, 2025.⁴

CLAIMS RECONCILIATION PROCESS

7. On August 21, 2025, the Court entered the *Order Establishing (A) Bar Dates and Related Procedures for Filing Proofs of Claim; (B) Approving the Form and Manner of Notice Thereof; and (C) Granting Related Relief* [Docket No. 66] (the “**Bar Date Order**”) setting:

- October 1, 2025, at 5:00 p.m. (prevailing Central Time) as the deadline for non-governmental creditors to file a proof of claim (a “**Proof of Claim**”) (the “**General Bar Date**”);
- February 16, 2026, at 5:00 p.m. (prevailing Central Time) as the deadline for governmental units (as defined in section 101(27) of the Bankruptcy Code) to file a Proof of Claim (the “**Governmental Bar Date**”);
- the later of (a) the General Bar Date and (b) 5:00 p.m. (prevailing Central Time) on the date that is 21 days following service of the order approving the rejection of the applicable executory contract or unexpired lease (the “**Rejection Damages Bar**”).

⁴ See Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates, (II) Occurrence of Such Plan’s Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims [Docket No. 1134].

Date”, together with the General Bar Date and the Governmental Bar Date, the “*Bar Dates*”).

8. On August 28, 2025, the Debtors’ claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global (the “*Claims and Noticing Agent*”), mailed notice of the Bar Dates (the “*Bar Date Notice*”) to potential claimants in accordance with the procedures set forth in the Bar Date Order. *See Certificate of Service* [Docket No. 353]. Also in accordance with the Bar Date Order, the Debtors published the Bar Date Notice in *The New York Times* on August 26, 2025. *See Affidavit of Publication* [Docket No. 142].

9. According to the official register of claims maintained by the Claims and Noticing Agent (the “*Claims Register*”), over 2,200 Proofs of Claim have been filed to date against the Reorganized Debtors.

10. On September 17, 2025, the Debtors filed their respective schedules of assets and liabilities (“*Schedules*”) and statements of financial affairs [Docket Nos. 178–322]. The Debtors listed numerous claims in their Schedules (such claims, along with the claims asserted in the Proofs of Claim, the “*Claims*”), some of which have been satisfied under the authority granted to the Debtors pursuant to certain “first day” orders of the Court (collectively, the “*First Day Orders*”) and other orders entered in the Chapter 11 Cases.⁵

11. The Reorganized Debtors, together with their advisors, are in the process of reviewing and reconciling all of the Claims. Based on this ongoing review, the Reorganized Debtors have determined that a significant number of Claims are without merit, have been

⁵ Under section 1111(a) of the Bankruptcy Code, scheduled claims, which have not been designated as disputed, contingent, and/or unliquidated, are treated as proofs of claim. *See* 11 U.S.C. § 1111(a) (“A proof of claim . . . is deemed filed under section 501 of this title for any claim . . . that appears in the schedules . . . except a claim . . . that is scheduled as disputed, contingent, or unliquidated.”).

satisfied, and/or are otherwise subject to disallowance, expungement, reclassification, recharacterization, subordination, or other adjustment.

PROPOSED OBJECTION PROCEDURES

12. To expedite and ultimately complete the Claims reconciliation process in a timely, efficient, and cost-effective manner, the Reorganized Debtors seek authorization to implement the proposed Objection Procedures. The proposed Objection Procedures describe the key aspects of the Reorganized Debtors' proposed Claims objection process including, among other things:

- (a) the form of the exhibits and the nature of the supporting documentation (if any) that the Reorganized Debtors will include with each Omnibus Objection;
- (b) the form of the Objection Notice;
- (c) standard instructions that Holders will receive regarding how to attempt to resolve the applicable Omnibus Objection and/or file a formal response thereto (a "***Response***") and a description of the implications of failing to timely file a Response;
- (d) when and how the Reorganized Debtors may file formal replies to any Responses;
- (e) reservations of rights regarding discovery which may be needed to resolve an Omnibus Objection; and
- (f) when and how hearings on Omnibus Objections will be scheduled.

13. The Objection Procedures align with the procedural safeguards for omnibus claim objections set forth in Bankruptcy Rule 3007(e), Bankruptcy Local Rule 3007-1, and the Complex Case Procedures and therefore ensure that the due process rights of affected Holders will be respected. As set forth in the Objection Procedures, the Reorganized Debtors will serve the affected Holders with an Objection Notice, which will include, among other things, (a) a description of the nature of the objection; (b) the procedures for filing a Response; (c) the hearing date, if applicable, and related information; and (d) how copies of Proofs of Claim, the Omnibus Objection, and other pleadings filed in the Chapter 11 Cases may be obtained.

ADDITIONAL GROUNDS FOR OBJECTION

14. Although the Reorganized Debtors expect to object to a number of Claims on the grounds enumerated in Bankruptcy Rule 3007(d), certain Claims may necessitate objections on additional grounds not expressly set forth therein (collectively, the “*Additional Grounds*”), including that such Claims, in whole or in part:

- (a) are inconsistent with the Reorganized Debtors’ books and records;
- (b) fail to specify the asserted Claim amount (or only list the Claim amount as “unliquidated”);
- (c) seek recovery of amounts for which the Reorganized Debtors are not liable;
- (d) are incorrectly or improperly classified, including, but not limited to, any Claims listed in the Claims Register or Reorganized Debtors’ Schedules as secured claims, priority claims, or under section 503(b)(9) of the Bankruptcy Code that are to be reclassified as unsecured claims, in whole or in part;
- (e) are filed against entities that are not Reorganized Debtors or against multiple Reorganized Debtors;
- (f) fail to specify a Reorganized Debtor against which the Claim is asserted;
- (g) are disallowed pursuant to section 502 of the Bankruptcy Code;
- (h) fail to sufficiently specify the basis for the Claim or provide sufficient supporting documentation therefor;
- (i) are disallowed pursuant to, or asserted in an amount, priority, or on terms that are otherwise inconsistent with, the Plan or the Confirmation Order;
- (j) have been withdrawn by informal written (including email) agreement between the Debtors and the Holder, but have not yet been formally withdrawn by the Holder through the submission via U.S. mail or email of a withdrawal of claim form (the “*Withdrawal Form*”) available on the Claims and Noticing Agent’s website pursuant to the instructions written on the Withdrawal Form (in which case, the Debtors’ propose to attach a copy of the writing or email evidencing such withdrawal to the Omnibus Objection);
- (k) have been satisfied by payment in full or in part on account of such Claim pursuant to the relief granted in the First Day Orders or any other orders of the Court;

- (l) have been satisfied by payment in full or in part on account of such Claim from a non-Debtor party, including, but not limited to, one or more of the Reorganized Debtors' insurers (in which case the details of payments must be included with the Omnibus Objection); or
- (m) are disallowed or subordinated to all Claims senior to or equal to the asserted Claim because such Claim arises out of the rescission of the purchase or sale of a security of a Reorganized Debtor (or an affiliate of a Reorganized Debtor) pursuant to section 510(b) of the Bankruptcy Code.

15. To minimize the cost, confusion, and delay otherwise attendant to preparing and filing individual objections on a claim-by-claim basis, the Reorganized Debtors seek to object, as contemplated by Bankruptcy Rule 3007(c), to certain Claims on the Additional Grounds outlined above in an omnibus objection format. The relief sought in this Motion will allow the Reorganized Debtors to complete the claims reconciliation process in a more timely, efficient, and cost-effective manner by avoiding the expense and delay attendant to preparing and filing dozens, perhaps even hundreds, of individualized objections based on the same or similar underlying grounds while at the same time not prejudicing the relevant Holder. Notably, the proposed Objection Procedures protect Holders due process rights by conferring safeguards for Omnibus Objections that align with those set forth in Bankruptcy Rule 3007(e), Bankruptcy Local Rule 3007-1, and the Complex Case Procedures.

BASIS FOR RELIEF

16. Section 502(a) of the Bankruptcy Code provides that “[a] claim or interest, proof of which is filed under section 501 of this title is deemed allowed, unless a party in interest . . . objects.” 11 U.S.C. § 502(a). Bankruptcy Rule 3001(f) states that “[a] proof of claim signed and filed in accordance with these rules is prima facie evidence of the claim's validity and amount.” Fed. R. Bankr. P. 3001(f). Under section 1111(a) of the Bankruptcy Code, scheduled claims, which are not designated as either disputed, contingent, or unliquidated, are treated as proofs of claim. *See* 11 U.S.C. § 1111(a) (“A proof of claim . . . is deemed filed under section 501 of this

title for any claim . . . that appears in the schedules . . . except a claim . . . that is scheduled as disputed, contingent, or unliquidated.”). As a result, the Reorganized Debtors must review all Claims in the Chapter 11 Cases as part of their claims reconciliation process.

17. In addition to the grounds enumerated in Bankruptcy Rule 3007(d) for filing omnibus objections to claims, Bankruptcy Rule 3007(c) affords the Court discretion to authorize omnibus objections based upon grounds beyond those explicitly delineated by Bankruptcy Rule 3007(d). *See* Fed. R. Bankr. P. 3007(c) (“Unless the court orders otherwise or [subdivision] (d) permits, objections to more than one claim may not be joined in a single objection”). Furthermore, the Complex Case Procedures expressly permit a debtor to seek court approval of procedures for filing omnibus objections to claims. *See* Complex Case Procedures § M.

18. Section 105(a) of the Bankruptcy Code provides that a bankruptcy court may “issue any order, process, or judgment that is necessary or appropriate to carry out the provisions of the [Bankruptcy Code].” 11 U.S.C. § 105(a). Under section 105(a) of the Bankruptcy Code, the Court has expansive equitable power to fashion any order or decree that is in the interest of preserving or protecting the value of a debtor’s assets, as long as the powers conferred under section 105 of the Bankruptcy Code are “exercised in a manner that is consistent with the Bankruptcy Code.” *Stern v. Stern (In re Stern)*, 204 F.3d 1117 (5th Cir. 1999).

19. Authorizing the Reorganized Debtors to file Omnibus Objections to Claims consistent with the proposed Objection Procedures is an appropriate use of the Court’s power under section 105(a) of the Bankruptcy Code and is authorized by Bankruptcy Rule 3007 and by the Complex Case Procedures. The proposed Objection Procedures are consistent with the underlying goal of balancing the due process rights of Holders with the efficient administration of large chapter 11 cases.

20. The proposed Objection Procedures would provide an organized framework for the careful review, prosecution, and reconciliation of Claims by, among other things: (a) providing greater certainty in administering the Claims objection process; (b) promoting the consensual resolution of Claims objections or, alternatively, establishing an efficient and fair mechanism to settle Claims objections; and (c) reducing the Reorganized Debtors' cost, time, and delay of prosecuting Claims objections. At the same time, the proposed Objection Procedures respect Holders' due process rights by, among other things, implementing the safeguards for Omnibus Objections already authorized under Bankruptcy Rule 3007(e), Bankruptcy Local Rule 3007-1, and the Complex Case Procedures, and requiring service of the Objection Notice on affected Holders in full compliance with the due process requirements of the Bankruptcy Code.

21. Similarly, allowing the Reorganized Debtors to object to Claims on the Additional Grounds in an omnibus format will promote the efficient and cost-effective administration of the Claims reconciliation process. Specifically, the relief requested will save the Reorganized Debtors the time and expense of filing potentially hundreds of individual Claim objections, some of which could be duplicative and confusing to Holders. The relief requested will permit the Reorganized Debtors to run a well-organized, efficient, and cost-effective Claims objection process, and all parties in interest will benefit from a streamlined process that will result in fewer pleadings and fewer hearings.

RESERVATION OF RIGHTS

22. Nothing in this Motion is intended to be nor shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized 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 Reorganized 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) an implication or admission that any particular claim is of a type specified or defined in an Omnibus Objection, or any order granting the relief requested in such Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

NOTICE

23. Notice of this Motion will be given to the parties on the Reorganized Debtors' Master Service List and all parties that have requested or that are required to receive notice pursuant to Bankruptcy Rule 2002. The Reorganized Debtors submit that, under the circumstances, no other or further notice is required.

24. A copy of the Motion is available on (a) the Court's website, at www.txs.uscourts.gov and (b) the website maintained by the Claims and Noticing Agent at <https://www.veritaglobal.net/ModivCare>.

WHEREFORE, the Reorganized Debtors respectfully request 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 27, 2026

Respectfully submitted,

/s/ Timothy A. ("Tad") Davidson II

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Co-Counsel for the Reorganized Debtors

CERTIFICATE OF SERVICE

I certify that on January 27, 2026, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

/s/ Timothy A. ("Tad") Davidson II
Timothy A. ("Tad") Davidson II

**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)
	:	
Reorganized Debtors. ¹	:	(Jointly Administered)
	:	
	X	

**ORDER APPROVING PROCEDURES
FOR REORGANIZED DEBTORS’ FILING OF
OMNIBUS CLAIMS OBJECTIONS AND GRANTING RELATED RELIEF
[Relates to Docket No.]**

Upon the motion (the “*Motion*”)² of the Reorganized Debtors for entry of an order (this “*Order*”): (a) approving the proposed procedures for filing omnibus claims objections (each, an “*Omnibus Objection*”) set forth herein and attached hereto as **Exhibit 1** (the “*Objection Procedures*”), (b) the form of the notice provided to affected Holders by each Omnibus Objection attached to the Proposed Order as **Exhibit 2** (the “*Objection Notice*”); and (c) granting related relief, all as more fully set forth in the Motion; and the Court having reviewed the Motion; 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 venue of this

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

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

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 Reorganized Debtors, their estates, their creditors, and other parties in interest, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. Notwithstanding anything to the contrary in the Bankruptcy Code and Bankruptcy Rules, and pursuant to Bankruptcy Rule 3007(c), Bankruptcy Local Rule 3007-1, and the Complex Case Procedures, the Reorganized Debtors are authorized to file Omnibus Objections that include objections to Claims on any basis provided for in Bankruptcy Rule 3007(d) or the Additional Grounds.

2. The Reorganized Debtors are further authorized to file and prosecute any Omnibus Objections in accordance with the Objection Procedures substantially in the form attached hereto as **Exhibit 1**, which are hereby approved.

3. The form of Objection Notice substantially in the form attached hereto as **Exhibit 2** is hereby approved.

4. In the event that a Response cannot be resolved and the Court holds an initial hearing in connection therewith, such initial hearing will be non-evidentiary and used as a scheduling conference.

5. Nothing in this Order shall affect the Reorganized Debtors' authority to pay Claims to the extent authorized by a separate order of the Court (including, without limitation, the Confirmation Order and the First Day Orders).

6. The Reorganized Debtors are authorized to object to Claims against a Reorganized Debtor whose case has been closed and these Objection Procedures shall apply to any such objections.

7. Notwithstanding the relief granted herein and any actions taken pursuant hereto, nothing herein shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized 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 Reorganized 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) an implication or admission that any particular claim is of a type specified or defined in an Omnibus Objection, or any order granting such Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

8. Notice of the Motion as provided therein shall be deemed good and sufficient notice of such Motion, and the requirements of the Bankruptcy Rules and the Bankruptcy Local Rules are satisfied by such notice.

9. The Reorganized Debtors are authorized to take all actions necessary or appropriate to effectuate the relief granted pursuant to this Order.

10. Notwithstanding any Bankruptcy Rule, including, but not limited to, Bankruptcy Rule 6004, to the contrary, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

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

Signed: _____, 2026
Houston, Texas

UNITED STATES BANKRUPTCY JUDGE

Exhibit 1

Objection Procedures

**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)
Reorganized Debtors.¹ : (Jointly Administered)
----- X

PROCEDURES FOR FILING OMNIBUS CLAIMS OBJECTIONS

1. Grounds for Omnibus Objections. In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), the Reorganized Debtors² may file omnibus objections (each, an “*Omnibus Objection*”) to Claims on the grounds that such Claims, in part or in whole:

- (a) are inconsistent with the Reorganized Debtors’ books and records;
- (b) fail to specify the asserted Claim amount (or only list the Claim amount as “unliquidated”);
- (c) seek recovery of amounts for which the Reorganized Debtors are not liable;
- (d) are incorrectly or improperly classified, including, but not limited to, any Claims listed in the Claims Register or Reorganized Debtors’ Schedules as secured claims, priority claims, or under section 503(b)(9) of the Bankruptcy Code that are to be reclassified as unsecured claims, in whole or in part;
- (e) are filed against entities that are not Reorganized Debtors or against multiple Reorganized Debtors;
- (f) fail to specify a Reorganized Debtor against which the Claim is asserted;

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

² Capitalized terms used but not defined herein have the meanings ascribed to them in the *Motion of Reorganized Debtors for Entry of an Order Approving Procedures for Reorganized Debtors’ Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. [●]] (the “*Motion*”).

- (g) are disallowed pursuant to section 502 of the Bankruptcy Code;
- (h) fail to sufficiently specify the basis for the Claim or provide sufficient supporting documentation therefor;
- (i) are disallowed pursuant to, or asserted in an amount, priority, or on terms that are otherwise inconsistent with, the Plan or the Confirmation Order;
- (j) have been withdrawn by informal written (including email) agreement between the Reorganized Debtors and the Holder, but have not yet been formally withdrawn by the Holder through the submission via U.S. mail or email of a withdrawal of claim form (the “*Withdrawal Form*”) available on the Claims and Noticing Agent’s website pursuant to the instructions written on the Withdrawal Form (in which case, a copy of the writing or email evidencing such withdrawal shall be attached to the Omnibus Objection);
- (k) have been satisfied by payment in full or in part on account of such Claim pursuant to the relief granted in the First Day Orders or any other orders of the Court;
- (l) have been satisfied by payment in full or in part on account of such Claim from a non-Debtor party, including, but not limited to, one or more of the Reorganized Debtors’ insurers (in which case the details of payments must be included with the Omnibus Objection); or
- (m) are disallowed or subordinated to all Claims senior to or equal to the asserted Claim because such Claim arises out of the rescission of the purchase or sale of a security of a Reorganized Debtor (or an affiliate of a Reorganized Debtor) pursuant to section 510(b) of the Bankruptcy Code.

2. Naming Convention for Omnibus Objections. Each Omnibus Objection will be numbered consecutively, regardless of the basis for the objection(s) contained therein.

3. Supporting Documentation. To the extent necessary for an affected Holder to be able to understand the basis of the applicable Omnibus Objection, an Omnibus Objection shall include an affidavit or declaration that provides a factual basis for the Reorganized Debtors’ objection to the Claims in such Omnibus Objection in accordance with Bankruptcy Local Rule 3007-1(a).

4. Claims Exhibits. An exhibit listing the Claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the Claims to which

there is a common basis for the objection. Claims for which there are more than one basis for the objection will be referenced on each exhibit applicable thereto. The exhibits will include, without limitation, the following information, alphabetized by Holder:

- (a) the Claims that are the subject of the Omnibus Objection and, if applicable, the Proof of Claim number related thereto from the Claims Register or the number of the Claim listed in the Schedules;
- (b) the asserted amount of the Claim;
- (c) the asserted classification of such Claim as either secured, priority unsecured, or general unsecured;
- (d) a summary of the grounds for the objection;
- (e) where the Omnibus Objection contains more than one basis for objection(s) to the subject Claims, a cross-reference to the section of the Omnibus Objection discussing such Claim; and
- (f) other information reasonably necessary for the affected Holder to understand the Reorganized Debtors' proposed treatment of the relevant Claim, including (as applicable): (i) the proposed classification of Claims the Reorganized Debtors seek to reclassify, (ii) the reduced claim amounts of Claims the Reorganized Debtors seek to reduce, or (iii) the surviving Claims or Proofs of Claim of Holders affected by the Omnibus Objection.

5. Objection Notice. Each Omnibus Objection will be accompanied by a customized objection notice, substantially in the form annexed to the order granting the Motion (the "**Order**") as Exhibit 2 (the "**Objection Notice**"), tailored, as appropriate, to address the particular Omnibus Objection, which will:

- (a) adequately describe the nature of the objection;
- (b) inform Holders that their rights may be affected by the objection;
- (c) describe the procedures for filing a written response (each, a "**Response**") to the objection, including all relevant dates and deadlines related thereto;
- (d) identify the hearing date, if applicable, and related information; and
- (e) describe how copies of Proofs of Claim, the Omnibus Objection, and other pleadings filed in the Chapter 11 Cases may be obtained.

6. Notice and Service. Each Omnibus Objection will be filed with the Court and served electronically using the Court's electronic filing system. Each Omnibus Objection (along with a copy of the Objection Notice) will be served on each Holder of a Claim that is subject to such objection by email, where available, and first-class mail where email is not available.

7. No Hearing Required for Unopposed Omnibus Objections. Omnibus Objections may be filed without a hearing date. For Claims subject to an Omnibus Objection and for which either (a) no Response is filed in accordance with the proposed response procedures, or (b) a Response is filed in accordance with the proposed response procedures, but such Response is resolved, the Reorganized Debtors may file a certificate of no objection or certificate of counsel pursuant to the Complex Case Procedures, and the Court may enter an order sustaining the Omnibus Objection with respect to such Claims without a hearing. If a Response is filed in connection with an Omnibus Objection that cannot be resolved, the Reorganized Debtors shall schedule a hearing for such Omnibus Objection with respect to the contested Claim(s).

8. Omnibus Claims Objection Hearings. If a hearing is set for an Omnibus Objection, such hearing shall be set no less than 30 days after service of the Omnibus Objection, unless otherwise ordered by the Court. In the Reorganized Debtors' sole discretion, and after notice to the affected Holder(s), the Reorganized Debtors may (without further order of the Court) adjourn the hearing on the Omnibus Objection to a subsequent hearing date by filing a notice or statement on the record. For Claims subject to an Omnibus Objection and for which either a) no Response is filed in accordance with the response procedures set forth herein (the "**Response Procedures**") and no appearance is made at the hearing or (b) a Response is filed in accordance with the Response Procedures but such Response is resolved prior to the hearing, the Reorganized Debtors may request at the hearing that the Court enter an order sustaining the Omnibus Objection with respect

to such Claims. Contested Claims for which a Response is filed in accordance with the Response Procedures, but such Response is not resolved prior to the hearing and an appearance is made at the hearing may be heard at the hearing or adjourned to a subsequent hearing date in the Reorganized Debtors' sole discretion. If a subsequent hearing is determined to be necessary, the Reorganized Debtors shall file with the Court and serve on the affected Holders a notice of the hearing (the date of which shall be determined in consultation with the affected Holder(s)) or announce such adjournment on the record. Notwithstanding the foregoing, nothing herein shall prejudice the Reorganized Debtors' rights to seek entry of an order sustaining the Omnibus Objection as to any or all Claims contained therein, as applicable, pursuant to the Complex Case Procedures.

9. Contested Matter. Each Claim subject to an Omnibus Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such Claim. The Reorganized Debtors may, in their discretion and in accordance with other orders of this Court (including the Confirmation Order), and the provisions of the Bankruptcy Code and Bankruptcy Rules, settle the priority, amount, and validity of such contested Claims without any further notice to, or action, order, or approval of, the Court.

RESPONSES TO OMNIBUS OBJECTIONS

10. Parties Required to File a Response. Any party who disagrees with an objection is required to file a Response in accordance with the Response Procedures and to appear at the hearing, if one is set. If a Holder whose Claim is subject to an Omnibus Objection does not file a Response in compliance with the procedures set forth below or fails to appear at the hearing, if one is set, the Court may, in its discretion, sustain the objection with respect to such Claim without further notice to the Holder.

11. Response Contents. Each Response must contain the following (at a minimum):

- (a) a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the Omnibus Objection to which the Response is directed;
- (b) a concise statement setting forth the reasons why the Court should not grant the objection with respect to such Claim, including the factual and legal bases upon which the Holder will rely in opposing the Omnibus Objection; and
- (c) the following contact information for the responding party:
 - (i) the name, mailing address, telephone number, and email address of the responding Holder, or the name, mailing address, telephone number, and email address of the Holder's attorney or designated representative to whom the attorneys for the Reorganized Debtors should serve a reply to the Response, if any; or
 - (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the Holder's behalf.

12. Filing of the Response. A Response will be deemed timely only if it is filed with the Court no later than 4:00 p.m. (prevailing Central Time) on the day that is thirty (30) calendar days from the date the Omnibus Objection is served. The Response deadline shall be set forth in the Objection Notice.

13. Failure to Respond. **Failure to (a) timely file a Response as set forth herein or (b) appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected Holders will be served with such order.

14. Reply to a Response. The Reorganized Debtors shall be permitted, but not required, to file a reply to any Response prior to the initial hearing with respect to the relevant Omnibus Objection.

MISCELLANEOUS

15. Additional Information. Copies of these procedures, the Motion, the Order or any other pleadings filed in the Chapter 11 Cases are available at no cost on the website maintained by the Reorganized Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global, at <https://www.veritaglobal.net/ModivCare>. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: <https://ecf.txsb.uscourts.gov/>.

16. Reservation of Rights. Nothing in any Omnibus Objection or Objection Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized 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 Reorganized 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) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Exhibit 2

Form of Objection Notice

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)
 :
 Reorganized Debtors.¹ : (Jointly Administered)
 :
 ----- X

NOTICE OF REORGANIZED DEBTORS’ [NUMBER] OMNIBUS CLAIM OBJECTION

This is an objection to your claim. This objection asks the Court to disallow the claim you filed in this bankruptcy case. If you do not file a response within 30 days after the objection was served on you, your claim may be disallowed without a hearing.

Claimants receiving this notice (this “Notice”) should locate the affected claims and the name of the creditor who filed it on the exhibits attached to the Omnibus Objection (as defined below). If you do not file a response by [●], 2026, at 4:00 p.m. (prevailing Central Time), your claim may be disallowed without a hearing.

If you timely file a response that cannot be resolved, a hearing will be scheduled.

INTRODUCTION

Why am I receiving this document? You are receiving this Notice because ModivCare Inc. and its debtor affiliates (referred to as the “*Reorganized Debtors*”) have filed the Objection attached hereto as **Appendix 1** (the “*Omnibus Objection*”) to your claim(s).²

Why is my claim being objected to? As summarized in the exhibit(s) to the Omnibus Objection, the Reorganized Debtors believe that the Proof of Claim that you filed or that was filed on your behalf is deficient because: [Summary of basis for Omnibus Objection to be inserted].

Where can I find out which claim is being objected to? The appendices attached hereto contain information needed for you to search for and identify the name of the creditor who filed the

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

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Omnibus Objection.

disputed claim, as well as the number of the claim as it appears on the claims register maintained by the Reorganized Debtors' Claims and Noticing Agent.

What do I need to do? If you disagree with the grounds of the objection, you must file a response (each, a "**Response**") with the United States Bankruptcy Court for the Southern District of Texas (the "**Court**") and send a copy to the Reorganized Debtors' attorneys pursuant to the procedures set forth below by no later than [●], 2026, at 4:00 p.m. (prevailing Central Time).

Where can I find out more information? To obtain more information about the Omnibus Objection, you can contact counsel to the Reorganized Debtors listed below. These attorneys represent the Reorganized Debtors and cannot give you legal advice. If you are seeking advice about your legal rights, you should consult your own attorney.

How do I file a response? To respond to this objection, you will need to state in writing why you believe the Omnibus Objection should be overruled in accordance with the Objection Procedures (as defined below). Any such response will need to be filed with the Court. More information on how to file documents with the Court can be found on the Court's website at <https://www.txs.uscourts.gov> or call the clerk's office at 713-250-5500. **Please do not contact the Court to discuss the merits of your Claim or the objection. The Court cannot give you legal advice.**

When do I need to file my response? Your Response must be filed no later than [●], 2026, at 4:00 p.m. (prevailing Central Time). If you do not respond by that date, **your Claim may be disallowed and expunged, reduced, and/or reclassified without further notice to you.**

IMPORTANT INFORMATION REGARDING THE OBJECTION

Grounds for the Omnibus Objection. By the Omnibus Objection, the Reorganized Debtors are seeking to **disallow and expunge, reduce, and/or reclassify/reduce** your Claim(s) based on set forth in the Omnibus Objection.

Omnibus Objection Procedures. On [●], 2026, the Court entered an order [Docket No. [●]] approving procedures, a copy of which are attached hereto as **Appendix 2**, for filing and resolving omnibus objections to claims asserted against the Reorganized Debtors in these Chapter 11 Cases (the "**Objection Procedures**").

Please review the response procedures for resolving the Omnibus Objection to ensure your response to the Omnibus Objection, if any, is timely and correctly filed.

RESPONSE PROCEDURES FOR RESOLVING THE OMNIBUS OBJECTION

Parties Required to File a Response. If you disagree with the Omnibus Objection filed against your Claim, you must file a Response with the Court in accordance with the Objection Procedures and appear at a hearing on the matter.

Response Contents. The Objection Procedures requires that each Response must contain the following information (at a minimum):

- (a) a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the title of the Omnibus Objection to which the Response is directed;
- (b) a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to your Claim or Proof of Claim, including the specific factual and legal bases upon which you rely in opposing the Omnibus Objection; and
- (c) the following contact information for the responding party:
 - (i) the name, mailing address, telephone number, and email address of the responding claimant, or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the Reorganized Debtors' counsel should serve a reply to the Response, if any; or
 - (ii) the name, mailing address, telephone number, and email address of the party with authority to reconcile, settle, or resolve the Omnibus Objection on your behalf.

Notice and Service. Your Response must be filed with the Court by [●], 2026, at 4:00 p.m. (prevailing Central Time) unless otherwise ordered by the Court.

Failure to Respond. **Failure to timely file a Response as set forth herein or to appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

Hearing. If a Response is timely filed that cannot be resolved, the Court will hold an initial hearing. The initial hearing will be non-evidentiary and used as a scheduling conference. **Failure to appear at the initial hearing may result in the summary disposition of the objection.**

Discovery. If any party determines that discovery is necessary in advance of a hearing on an Omnibus Objection, the party may serve notice on the affected Reorganized Debtor or claimant and its counsel of record. Failure to comply with this paragraph will not preclude a party from later seeking discovery.

ADDITIONAL INFORMATION

Questions or Information. Copies of all pleadings filed in the Chapter 11 Cases (including the Omnibus Objection) are available at no cost on the website maintained by the Reorganized Debtors' Claims and Noticing agent at <https://www.veritaglobal.net/ModivCare>. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: <https://ecf.txsb.uscourts.gov>. **Please do not contact the Court to discuss the merits of any Claim or Objection.**

RESERVATION OF RIGHTS

Nothing in the Omnibus Objection or this Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized 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 Reorganized 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) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Appendix 1

Omnibus Objection

Appendix 2

Objection Procedures