

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

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In re: : Chapter 11
:
MODIVCARE INC., et al., : Case No. 25-90309 (ARP)
:
Reorganized Debtors.¹ : (Jointly Administered)
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NOTICE REGARDING THE STATUS OF VARIOUS CURE OBJECTIONS
[Relates to Docket Nos. 605 & 1055]

PLEASE TAKE NOTICE THAT, on October 30, 2025, the Reorganized Debtors² filed the *Notice of Potential Assumption of Certain of Debtors’ Executory Contracts and Unexpired Leases* [Docket No. 605] (the “**Cure Notice**”) listing certain executory contracts and unexpired leases (those executory contracts and unexpired leases identified on the Cure Notice, collectively, the “**Potentially Assumed Contracts**”), and their respective Proposed Cures, that the Reorganized Debtors intended to assume as part of the Chapter 11 Cases.

PLEASE TAKE FURTHER NOTICE THAT, the deadline for the counterparties to the Potentially Assumed Contracts (the “**Counterparties**”) to file an objection (including any informal comments or objections received by the Reorganized Debtors, “**Cure Objections**”) to the assumption of the Potentially Assumed Contracts or the Proposed Cures for such Potentially Assumed Contracts was November 17, 2025 (the “**Objection Deadline**”).

PLEASE TAKE FURTHER NOTICE THAT, various Counterparties filed Cure Objections prior to the Objection Deadline (all such Counterparties, collectively, the “**Objecting Counterparties**”).

PLEASE TAKE FURTHER NOTICE THAT, the Reorganized Debtors have been working with, and continue to work with certain of, the Objecting Counterparties in order to reach a consensual resolution of such parties’ Cure Objections.

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>. Debtor ModivCare Inc.’s principal place of business and the Debtors’ service address in the Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Cure Notice or the Confirmation Order, as applicable.



PLEASE TAKE FURTHER NOTICE THAT, on December 5, 2025, the Reorganized Debtors filed the *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates* [Docket No. 959] (the “**Plan**”).

PLEASE TAKE FURTHER NOTICE THAT, on December 15, 2025, the Court entered the *Order (I) Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates and (II) Denying Motions of Official Committee of Unsecured Creditors for Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Causes of Action on Behalf of Debtors’ Estates* [Docket No. 1055] (the “**Confirmation Order**”).

The Confirmation Order provides that the Reorganized Debtors must file a notice of dispute with the Court (and promptly serve such notice on the applicable counterparty) by January 28, 2026, if any dispute regarding the assumption, or assumption and assignment, of the Potentially Assumed Contracts, including, without limitation, the Proposed Cure or the applicable Reorganized Debtor’s ability to provide adequate assurance of future performance, cannot be resolved consensually the applicable parties. *See* Confirmation Order, ¶ 36.

In accordance with the Confirmation Order, the Reorganized Debtors hereby advise the Court and parties in interest that, as of January 28, 2026, the Reorganized Debtors (a) have resolved certain Cure Objections and (b) remain in active negotiations with the Objecting Counterparties listed on **Schedule 1** hereto (the “**Cure Objection Schedule**”), in an effort to consensually resolve such remaining Cure Objections.

The Reorganized Debtors and the Objecting Counterparties set forth on **Schedule 1** hereto (collectively, the “**Unresolved Objecting Counterparties**”) continue to have productive discussions regarding a resolution of such parties’ Cure Objections, and, as such, have agreed to continue engaging in negotiations regarding a consensual resolution, rather than to seek a hearing before the Court at this juncture. In the event the Reorganized Debtors and Unresolved Objecting Counterparties cannot reach a consensual resolution within the next 30 days, the Reorganized Debtors will (a) file a notice (a “**Supplemental Cure Status Notice**”) providing the Court a further update as to the status of such Cure Objection(s) by no later than February 28, 2026, and (b) reach out to the Court to set a hearing on any remaining unresolved Cure Objections as of the filing of the Supplemental Cure Status Notice unless the applicable Unresolved Objecting Counterparty agrees to continue engaging on a consensual resolution for additional time prior to seeking a hearing before the Court.

The Reorganized Debtors have discussed this notice with each Objecting Counterparty and shall ensure that each Objecting Counterparty is served with a copy of this Notice.

The Reorganized Debtors’ listing of an unresolved Cure Objection on the Cure Objection Schedule shall not be deemed or construed as (a) a promise by the Reorganized Debtors to seek the assumption of the applicable Designated Contract(s), (b) a limitation or waiver on the Reorganized Debtors’ ability to seek to reject any applicable Designated Contract, or (c) an admission that any applicable Designated Contract is, in fact, an executory contract or unexpired lease under section 365 of the Bankruptcy Code. Moreover, the Reorganized Debtors explicitly reserve their rights, in their sole discretion, to assume or reject each

Designated Contract set forth on the Cure Notice pursuant to section 365(a) of the Bankruptcy Code and nothing herein (a) alters in any way the prepetition nature of the contracts and leases or the validity, priority, or amount of any claims that a Counterparty may hold against the Reorganized Debtors that under such Designated Contract, (b) creates a postpetition contract or agreement, or (c) elevates to administrative expense priority any claims of a counterparty to a Designated Contract against the Reorganized Debtors that may arise under such Designated Contract. The Reorganized Debtors reserve all their rights, claims, and causes of action with respect to the contracts, leases and other agreements associated with the parties set forth on the Cure Objection Schedule.

All documents filed with the Court in connection with the above-captioned Chapter 11 Cases, including the Plan, the Cure Notice, and the Confirmation Order may be obtained free of charge by visiting the solicitation website maintained by the Reorganized Debtors' balloting and solicitation agent, Kurtzman Carson Consultants, LLC (d/b/a Verita Global), at <https://www.veritaglobal.net/ModivCare>. Copies of the Plan and Disclosure Statement may also be obtained by calling the Solicitation Agent at (888) 733-1521 (U.S./Canada) or +1 (310) 751-2636 (International) or submitting an inquiry at <https://www.veritaglobal.net/ModivCare/Inquiry>. You may also obtain these documents and any other pleadings filed in the Reorganized Debtors' Chapter 11 Cases (for a fee) at: www.txs.uscourts.gov.

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Dated: January 28, 2026
Houston, Texas

Respectfully submitted,

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

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CERTIFICATE OF SERVICE

I certify that on January 28, 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

Schedule 1

Cure Objection Schedule

Objecting Counterparty	Cure Objection Docket Number(s)	Date of Filing of Cure Objection
CNC-Access Inc. a/k/a Community Alternatives Virginia, Inc.	708	November 13, 2025
EMS MC ¹	750–752, 754–786	November 19, 2025
Friendly Medical Transportation	723	November 14, 2025
Global Medical Response Inc., et al.	948	November 14, 2025
Keystone Family Health Plan and AmeriHealth Caritas Health Plan	792	November 21, 2025
Molina Healthcare Inc., et al.	954	December 5, 2025
Northeast Treatment Centers (NET)	673	November 6, 2025
PRN Ambulance LLC and ProTransport-1 LLC	721	November 14, 2025

¹ EMS | MC filed Cure Objections on behalf of a number of affiliated entities. EMS | MC also submitted informal objections to the Reorganized Debtors on behalf of certain affiliate entities. The Reorganized Debtors and EMS | MC are continuing to negotiate resolutions to the filed Cure Objections and the informal objections.