

**IN THE UNITED STATES BANKRUPTCY 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)

STIPULATION REGARDING TESTIMONY OF DANA MOTT
(Relates to Docket Nos. 1133, 1188, and 1213)

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

At the Court’s invitation, HealthSpring, Inc. and the Reorganized Debtors (“ModivCare”) (collectively the “Parties”) met and conferred regarding the testimony of Ms. Dana Mott. The Parties, through their undersigned counsel, agree and stipulate to the following:

1. In lieu of live testimony, the Declaration of Ms. Mott filed as Docket No. 5-3 in Adversary Proceeding 26-3035 (February 6, 2026), along with four exhibits (HealthSpring Exhibits 10, 11, 12, and 53) (Docket Nos. 1283-65, 1283-10, 1283-11, 1283-12, and 1283-53) are admitted into evidence.

2. ModivCare reserves its right to object to the relevance of the evidence.

Dated: February 17, 2026

Respectfully submitted,

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