

ENTERED

February 19, 2026

Nathan Ochsner, Clerk

**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

**ORDER APPROVING PROCEDURES
 FOR REORGANIZED DEBTORS’ FILING OF
OMNIBUS CLAIMS OBJECTIONS AND GRANTING RELATED RELIEF
 [Relates to Docket No. 1201]**

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and upon the record herein; and after due deliberation thereon; and all objections, if any, to the Motion having been withdrawn, resolved, or overruled; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted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: February 19, 2026


Alfredo R Pérez
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., <i>et al.</i> ,	:	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