

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)
 :
 ----- X

NOTICE OF FILING REVISED PROPOSED ORDER AUTHORIZING THE REORGANIZED DEBTORS TO REJECT CERTAIN EXECUTORY CONTRACTS
[Relates to Motion at Docket No. 1133]

PLEASE TAKE NOTICE that, in connection with this Court’s direction, attached hereto is a revised proposed order (the “*Revised Order*”) authorizing the above-captioned reorganized debtors (the “*Reorganized Debtors*”) to reject certain executory contracts, effective as of February 28, 2026. Also attached hereto, as **Exhibit A**, is a redline comparing the Revised Order to the initial proposed order filed at Docket No. 1133-1.

PLEASE TAKE FURTHER NOTICE that the Reorganized Debtors have shared the Revised Order with counsel to HealthSpring, Inc. (the “*Counterparty*”). The Reorganized Debtors have conferred with the Counterparty regarding the Revised Order and the Counterparty has not agreed to the form of the Revised Order. The Reorganized Debtors respectfully request entry of the Revised Order in accordance with this Court’s direction at the hearing held on February 17, 2026.

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 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 Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.



Dated: February 20, 2026
Houston, Texas

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 February 20, 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

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MODIVCARE INC., <i>et al.</i> ,	:	Case No. 25-90309 (ARP)
	:	
Reorganized Debtors. ¹	:	(Jointly Administered)
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**ORDER AUTHORIZING THE REORGANIZED
DEBTORS TO REJECT CERTAIN EXECUTORY CONTRACTS**
[Relates to Motion at Docket No. 1133]

Upon the motion (the “*Motion*”)² of the above-captioned reorganized debtors (the “*Reorganized Debtors*”) for entry of an order (this “*Order*”) authorizing the Reorganized Debtors to reject certain executory contracts, each as set forth on **Exhibit 1** attached hereto (collectively, the “*Rejected Contracts*”), effective as of the Rejection Date, all as more fully set forth in the Motion; 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; 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) 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 proceeding and the Motion in this district is proper pursuant to 28 U.S.C. § 1408; and the Court having found that 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 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 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 otherwise defined herein shall have the meanings ascribed to them in the Motion.

Reorganized Debtors provided appropriate notice of the Motion and the opportunity for a hearing on the Motion under the circumstances and that no other or further notice is necessary; 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 and the hearing, if any, with respect to the Motion establish just cause for the relief granted herein; and after due deliberation thereon; and good and sufficient cause appearing therefor, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. For the reasons stated on the record, the Reorganized Debtors are authorized to reject the Rejected Contracts identified on Exhibit 1 attached hereto, including any agreements, riders, schedules, certificates, memoranda, amendments, supplements, guaranties, and any other documents related thereto, effective as of February 28, 2026.

2. Nothing in this Order shall prejudice the rights of the Counterparty with respect to any claim for damages arising from the rejection of the Rejected Contracts and with respect to any objection by the Reorganized Debtors thereto.

3. Nothing herein shall prejudice the rights of the Reorganized Debtors to argue that any claim for damages arising from the rejection of the Rejected Contracts is limited to the remedies available under any applicable termination provision of such contract or lease, as applicable, or that any such claim is an obligation of a third party and not that of the Reorganized Debtors or their estates.

4. Nothing in the Motion or this Order, or any payment made pursuant to this Order, is intended to be or shall be deemed as (a) an admission as to the validity of any claim against any Debtor or the existence of any lien against the Reorganized Debtors' properties; (b) a waiver of the Reorganized Debtors' rights to dispute any claim or lien on any grounds; (c) a promise to pay

any claim; (d) an implication or admission that any particular claim would constitute an allowed claim; (e) an assumption or rejection of any executory contract or unexpired lease pursuant to section 365 of the Bankruptcy Code (other than the Rejected Contracts); or (f) a limitation on the Reorganized Debtors' rights under section 365 of the Bankruptcy Code to assume or reject any executory contract with any party subject to this Order. Nothing contained in this Order shall be deemed to increase, decrease, reclassify, elevate to an administrative expense status, or otherwise affect any claim to the extent it is not paid.

5. Notwithstanding Bankruptcy Rule 6004(h) to the extent applicable, this Order shall be effective and enforceable immediately upon entry hereof.

6. The Reorganized Debtors are authorized to take all reasonable actions necessary to effectuate the relief granted in this Order.

7. The 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

Alfredo R. Pérez
United States Bankruptcy Judge

Exhibit 1**Rejected Contracts¹**

No.	Debtor	Counterparty	Counterparty Address	Contract Title	Effective Date	Termination Date
1.	ModivCare Solutions, LLC	Cigna Corporate Services, LLC	Two Liberty Place 1601 Chestnut Street Philadelphia, PA 19192 ²	Master Services Agreement	April 1, 2023	April 1, 2028
2.	ModivCare Solutions, LLC	Cigna Corporate Services, LLC	Two Liberty Place 1601 Chestnut Street Philadelphia, PA 19192	Statement of Work No. 11007	April 15, 2023	January 31, 2028
3.	ModivCare Solutions, LLC	Cigna Corporate Services, LLC	Two Liberty Place 1601 Chestnut Street Philadelphia, PA 19192	Amendment No. 1 to Statement of Work	November 1, 2023	January 31, 2028

¹ The Rejected Contracts shall include any agreements, riders, schedules, certificates, memoranda, amendments, supplements, guaranties, and any other documents related thereto.

² Notice is required to be delivered to 900 Cottage Grove Road Hartford, CT 06152, Attn: Supply Chain Management, C8SCM.

No.	Debtor	Counterparty	Counterparty Address	Contract Title	Effective Date	Termination Date
4.	ModivCare Solutions, LLC	Cigna Corporate Services, LLC	Two Liberty Place 1601 Chestnut Street Philadelphia, PA 19192	Amendment No. 2 to Statement of Work	June 1, 2024	January 31, 2028
5.	ModivCare Solutions, LLC	Cigna Corporate Services, LLC	Two Liberty Place 1601 Chestnut Street Philadelphia, PA 19192	Amendment No. 3 to Statement of Work	January 1, 2024	January 31, 2028

Exhibit A
(Redline)

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**ORDER AUTHORIZING
THE REORGANIZED
DEBTORS TO REJECT CERTAIN EXECUTORY CONTRACTS**
[Relates to Motion at Docket No. 1133]

Upon the motion (the “*Motion*”)² of the above-captioned reorganized debtors ~~and debtors in possession~~ (the “Reorganized Debtors”) for entry of an order (this “*Order*”) authorizing the Reorganized Debtors to reject certain executory contracts, each as set forth on Exhibit 1 attached hereto (collectively, the “*Rejected Contracts*”), effective as of the Rejection Date, all as more fully set forth in the Motion; 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; 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) and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having

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

found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. § 1408; and the Court having found that the Reorganized Debtors provided appropriate notice of the Motion and the opportunity for a hearing on the Motion under the circumstances and that no other or further notice is necessary; 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 and the hearing, if any, with respect to the Motion establish just cause for the relief granted herein; and after due deliberation thereon; and good and sufficient cause appearing therefor, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. ~~The~~For the reasons stated on the record, the Reorganized Debtors are authorized to reject the Rejected Contracts identified on Exhibit 1 attached hereto, including any agreements, riders, schedules, certificates, memoranda, amendments, supplements, guaranties, and any other documents related thereto, effective as of ~~January~~February 28, 2026.

2. Nothing in this Order shall prejudice the rights of the Counterparty with respect to any claim for damages arising from the rejection of the Rejected Contracts and with respect to any objection by the Reorganized Debtors thereto.

3. Nothing herein shall prejudice the rights of the Reorganized Debtors to argue that any claim for damages arising from the rejection of the Rejected Contracts is limited to the remedies available under any applicable termination provision of such contract or lease, as applicable, or that any such claim is an obligation of a third party and not that of the Reorganized Debtors or their estates.

4. Nothing in the Motion or this Order, or any payment made pursuant to this Order, is intended to be or shall be deemed as (a) an admission as to the validity of any claim against

any Debtor or the existence of any lien against the Reorganized Debtors' properties; (b) a waiver of the Reorganized Debtors' rights to dispute any claim or lien on any grounds; (c) a promise to pay any claim; (d) an implication or admission that any particular claim would constitute an allowed claim; (e) an assumption or rejection of any executory contract or unexpired lease pursuant to section 365 of the Bankruptcy Code (other than the Rejected ~~Contract~~Contracts); or (f) a limitation on the Reorganized Debtors' rights under section 365 of the Bankruptcy Code to assume or reject any executory contract with any party subject to this Order. Nothing contained in this Order shall be deemed to increase, decrease, reclassify, elevate to an administrative expense status, or otherwise affect any claim to the extent it is not paid.

5. Notwithstanding Bankruptcy Rule 6004(h) to the extent applicable, this Order shall be effective and enforceable immediately upon entry hereof.

6. The Reorganized Debtors are authorized to take all reasonable actions necessary to effectuate the relief granted in this Order.

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Summary report:	
Litera Compare for Word 11.10.1.2 Document comparison done on 2/20/2026 9:12:46 AM	
Style name: L&W with Moves	
Intelligent Table Comparison: Active	
Original DMS: iw://usdocs.lw.com/US-DOCS/168447551/1	
Modified DMS: iw://usdocs.lw.com/US-DOCS/168447551/3	
Changes:	
Add	21
Delete	7
<i>Move From</i>	0
<i>Move To</i>	0
Table Insert	0
Table Delete	0
<i>Table moves to</i>	0
<i>Table moves from</i>	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	28