

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

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 In re: : Chapter 11
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 MODIVCARE INC., *et al.*, : Case No. 25-90309 (ARP)
 :
 Reorganized Debtors.¹ : (Jointly Administered)
 :
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**CERTIFICATE OF NO OBJECTION REGARDING FINAL FEE APPLICATION
OF ERNST & YOUNG LLP FOR COMPENSATION OF SERVICES RENDERED
AS TAX, CONSULTING, ACCOUNTING, AND VALUATION SERVICES
PROVIDER TO THE DEBTORS FOR THE PERIOD FROM
AUGUST 20, 2025, THROUGH DECEMBER 29, 2025
[Relates to Docket No. 1271]**

Pursuant to the Procedures for Complex Cases in the Southern District of Texas (the “**Complex Case Procedures**”), the undersigned hereby certifies as follows:

1. On February 9, 2026, the above-captioned reorganized debtors (collectively, the “**Reorganized Debtors**”) filed the *Final Fee Application of Ernst & Young LLP for Compensation of Services Rendered as Tax, Consulting, Accounting, and Valuation Services Provider to the Debtors for the Period from August 20, 2025, through December 29, 2025* [Docket No. 1271] (the “**Application**”), which included a proposed order [Docket No. 1271-1] (the “**Original Proposed Order**”).

¹ A complete list of each of the reorganized debtors (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. The deadline to file objections to the Application was March 2, 2026 (the “**Objection Deadline**”).

3. The Objection Deadline passed and, in accordance with paragraph 44 of the Complex Case Procedures, the undersigned represents to the Court that counsel has reviewed the Court’s docket and no objections or other responses to the Application have been filed on the Court’s docket, and the Reorganized Debtors are unaware of any other objection to the Application.

4. Subsequent to the filing of the Application, Ernst & Young LLP realized that the total fees for consulting services set forth on page 13 of the Application should have been \$207,514.10, as opposed to the \$360,252.80 that was indicated in the Application. The error was the result of an inadvertent transcription error made in calculating the amounts owed per month for consulting services. Accordingly, attached hereto is (i) a revised proposed order (the “**Revised Proposed Order**”) which corrects the aforementioned inadvertent transcription error by reducing the total compensation and reimbursement of expenses sought in the Application from \$1,707,182.80 to \$1,554,444.10 (which accounts for the \$152,728.70 discrepancy, *i.e.*, \$360,252.80 - \$207,514.10, attributable to the aforementioned inadvertent transcription error), and (ii) a redline comparing the Revised Proposed Order to the Original Proposed Order.²

5. Accordingly, the Reorganized Debtors respectfully request that the Court enter the proposed order attached hereto.

² Prior to the filing of this Certificate of No Objection counsel to the Office of the United States Trustee was advised of this inadvertent transcription error, and that such error would be addressed by seeking entry of the Revised Proposed Order correcting the error by reducing the compensation sought in the Original Proposed Order by the amount of the discrepancy attributable to the inadvertent transcription error.

Dated: March 3, 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 March 3, 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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Reorganized Debtors.	:	(Jointly Administered)
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**ORDER GRANTING FIRST AND FINAL FEE APPLICATION OF ERNST & YOUNG
LLP FOR COMPENSATION OF SERVICES RENDERED AS TAX, CONSULTING,
ACCOUNTING, AND VALUATION SERVICES PROVIDER TO THE DEBTORS
FOR THE FEE PERIOD FROM AUGUST 20, 2025, THROUGH DECEMBER 29, 2025**

[Relates to Application at Docket No. 1271]

The Court has considered the *First and Final Fee Application of Ernst & Young LLP for Compensation of Services Rendered as Tax, Consulting, Accounting, and Valuation Services Provider to the Debtors for the Period from August 20, 2025, Through December 29, 2025* (the “*Application*”), filed by Ernst & Young LLP (the “*Applicant*”). The Court orders:

1. Applicant is allowed compensation and reimbursement of expenses in the amount of \$1,554,444.10 for the period set forth in the Application.
2. The compensation and reimbursement of expenses allowed in this Order are approved on a final basis.

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 Debtor’s claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Reorganized Debtor ModivCare Inc.’s principal place of business and Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

3. The Reorganized Debtors are authorized to disburse any unpaid amounts allowed by paragraphs 1 or 2 of this Order.

Dated: _____, 2026
Houston, Texas

ALFREDO R. PÉREZ
UNITED STATES BANKRUPTCY JUDGE

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
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[Relates to Application at Docket No. [1271](#)]

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1. Applicant is allowed compensation and reimbursement of expenses in the amount of ~~\$1,707,182.80~~ [1,554,444.10](#) for the period set forth in the Application.
2. The compensation and reimbursement of expenses allowed in this Order are approved on a final basis.
3. The Reorganized Debtors are authorized to disburse any unpaid amounts allowed by paragraphs 1 or 2 of this Order.

Dated: _____, 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 Reorganized Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtor’s claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Reorganized Debtor ModivCare Inc.’s principal place of business and Reorganized Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

Houston, Texas

ALFREDO R. PÉREZ
UNITED STATES BANKRUPTCY JUDGE