

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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**REORGANIZED DEBTORS’ MOTION FOR ENTRY OF AN
ORDER EXTENDING THE TIME TO FILE AND SERVE OBJECTIONS TO CLAIMS**

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at <https://ecf.txsb.uscourts.gov/> within twenty-one days from the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

The above-captioned reorganized debtors (prior to the Effective Date,² collectively, the “*Debtors*” and after the Effective Date, collectively, the “*Reorganized Debtors*”) respectfully state the following in support of this motion (the “*Motion*”):

RELIEF REQUESTED

1. The Reorganized Debtors seek entry of an order, substantially in the form attached hereto (the “*Order*”), extending the Claims Objection Deadline by 90 days from the present

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 given to them in the Plan (as defined herein).



deadline of March 30, 2026,³ through and including June 29, 2026, without prejudice to the rights of the Reorganized Debtors to request further extensions of the Claims Objection Deadline to the extent provided by the *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates* [Docket No. 959] (as may be amended, modified, and supplemented, the “*Plan*”).

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the Southern District of Texas (the “*Court*”) has jurisdiction to consider this Motion under 28 U.S.C. § 1334. This is a core proceeding under 28 U.S.C. § 157, and this Court may enter a final order consistent with Article III of the United States Constitution. Venue is proper under 28 U.S.C. §§ 1408 and 1409.

3. The bases for the relief requested herein are section 105(a) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “*Bankruptcy Code*”), rule 9006 of the Federal Rules of Bankruptcy Procedure (the “*Bankruptcy Rules*”), rule 9013-1 of the Bankruptcy Local Rules for the Southern District of Texas (the “*Bankruptcy Local Rules*”), and the Procedures for Complex Cases in the Southern District of Texas.

BACKGROUND

4. On August 20, 2025 (the “*Petition Date*”), the Debtors filed voluntary petitions for relief in this Court commencing cases (the “*Chapter 11 Cases*”) under chapter 11 of the Bankruptcy Code. The factual background regarding the Debtors, including their business, their capital structure, and the events leading to the commencement of the Chapter 11 Cases is set forth in the *Declaration of Chad J. Shandler in Support of Chapter 11 Petitions and First-Day Relief* [Docket No. 14].

³ All dates in this Motion are calculated pursuant to Bankruptcy Rule 9006.

5. On December 15, 2025, the Court entered the Order *(I) Confirming the 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**”) which, among other things, confirmed the Plan. On December 29, 2025, the Plan was substantially consummated and the Effective Date occurred.⁴

6. The Plan provides that the Reorganized Debtors are authorized to object to scheduled claims and proofs of claims and interests. *See* Plan, Art. VII § 7.2.

7. On August 21, 2025, the Court entered the Order Establishing *(A) Bar Dates and Related Procedures for Filing Proofs of Claim, (B) Approving the Form and Manner of Notice Thereof, and (C) Granting Related Relief*, [Docket No. 66] (the “**Bar Date Order**”) pursuant to which the Court, among other things, established October 1, 2025, at 5:00 p.m. (prevailing Central Time) (the “**General Bar Date**”), as the deadline for all non-governmental entities⁵ holding or wishing to assert a “claim” (as defined in section 101(5) of the Bankruptcy Code) against the Debtors that arose on or prior to the Petition Date to file Proofs of Claim.

CLAIM OBJECTION AND RECONCILIATION PROCESS

8. The Plan provides that the deadline for the Reorganized Debtors to object to claims (the “**Claims Objection Deadline**”) is “ninety (90) days after the Effective Date, *provided that*, the Claims Objection Deadline is ninety (90) days after the Governmental Bar Date for a Proof of

⁴ *See Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates, (II) Occurrence of Such Plan's Effective Date, and (III) Related Deadlines With Respect To Administrative Expense and Rejection Damage Claims* [Docket No. 1134].

⁵ The deadline for all governmental units asserting a “claim” (as defined in section 101(5) of the Bankruptcy Code) against the Debtors that arose on or prior to the Petition Date to file written proof of such claim was February 16, 2026, at 5:00 p.m. (prevailing Central Time) (together with the General Bar Date, the “**Bar Dates**”).

Claim filed by a governmental unit . . . which dates may be extended pursuant to an order of the Bankruptcy Court upon a motion filed by the Reorganized Debtors.”⁶ As the Effective Date occurred on December 29, 2025, the Claims Objection Deadline with respect to claims filed by non-governmental units is March 30, 2026. Further, as the Governmental Bar Date occurred on February 16, 2026, the Claims Objection Deadline with respect to claims filed by Governmental Units is May 18, 2026. For the avoidance of doubt, this Motion is seeking to extend the Claims Objection Deadline, as such deadline is applicable to claims filed by both non-Governmental Units and Governmental Units, to June 29, 2026, without prejudice to the rights of the Reorganized Debtors to request further extensions of the Claims Objection Deadline.

9. Since the Effective Date, the Reorganized Debtors and their advisors have been diligently working to reconcile the over 2,000 claims filed in these Chapter 11 Cases. To date, the Reorganized Debtors have filed certain individual and omnibus claim objections and expect to file additional omnibus and individual claim objections.

10. While the Reorganized Debtors have worked diligently to complete the claims resolution process, it has now become clear that certain claims will not be able to be resolved before the current Claims Objection Deadline. As a result, it is necessary to extend the Claims Objection Deadline. At this time, the Reorganized Debtors are requesting a 90-day extension of the Claims Objection Deadline to June 29, 2026.

BASIS FOR RELIEF

11. Section 105(a) of the Bankruptcy Code provides that the Court may issue an order that is necessary or appropriate to carry out the provisions of the Bankruptcy Code. 11 U.S.C. § 105(a). Pursuant to Bankruptcy Rule 9006(b)(1), “when an act is required or allowed to be done

⁶ See Plan, Art. I(A).

at or within a specified period . . . by order of the court, the court for cause may at any time in its discretion . . . with or without motion or notice order the period enlarged if the request therefore is made before the expiration of the period originally prescribed.” Fed. R. Bankr. P. 9006(b). As set forth above, the Plan also provides for an extended Claims Objection Deadline to be set by order of the Court. Plan, Art. I(A).

12. To allow the Reorganized Debtors sufficient time to review the filed Proofs of Claim against the Debtors, the Reorganized Debtors respectfully request an extension of the Claims Objection Deadline by 90 days, through and including June 29, 2026. Rather than objecting to claims merely to satisfy the current Claims Objection Deadline, the Reorganized Debtors believe it is in the best interests of all parties to continue the review and reconciliation process.

13. An extension of the Claims Objection Deadline will ensure that the Reorganized Debtors complete the claim reconciliation process, do not unnecessarily forfeit valid defenses to claims, do not expend resources in objecting to claims that could otherwise be resolved consensually, and do not otherwise permit claims to be allowed in amounts that are not justified. Accordingly, the Reorganized Debtors respectfully submit that an extension of the Claims Objection Deadline by 90 days, through and including June 29, 2026, is authorized by the Bankruptcy Code and the terms of the Plan, and should be granted.

[Remainder of page intentionally left blank]

Dated: March 9, 2026

Respectfully submitted,

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

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Co-Counsel for the Reorganized Debtors

Certificate of Service

I certify that on March 9, 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

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

	x	
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In re:	:	Chapter 11
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MODIVCARE INC., <i>et al.</i> ,	:	Case No. 25-90309 (ARP)
	:	
Reorganized Debtors. ¹	:	(Jointly Administered)
	:	
	x	

**ORDER GRANTING REORGANIZED DEBTORS’ MOTION FOR ENTRY OF AN
ORDER EXTENDING THE TIME TO FILE AND SERVE OBJECTIONS TO CLAIMS**
[Relates to Docket No. ____]

Upon the Motion (the “*Motion*”)² of the above-captioned Reorganized Debtors seeking entry of an order (this “*Order*”) extending the Claims Objection Deadline, as more fully set forth in the Motion; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and it appearing that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and it appearing that the Court may enter a final order consistent with Article III of the United States Constitution; and it appearing that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that notice of the Motion and the opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and the Court having reviewed the Motion and all responses, if any, to the Motion having been withdrawn, resolved, or overruled; and the Court having determined that the legal and factual

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bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefore, it is **HEREBY ORDERED THAT**:

1. The Claims Objection Deadline is hereby extended by 90 days, through and including **June 29, 2026**.³

2. This Order is without prejudice to the rights of the Reorganized Debtors to seek further extension of the Claims Objection Deadline.

3. The Reorganized Debtors are authorized to take such actions and to execute such documents as may be necessary to implement the relief granted by this Order.

4. Notwithstanding any provision in the Bankruptcy Rules to the contrary, this Order shall be immediately effective and enforceable upon its entry.

5. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: _____

ALFREDO R. PÉREZ
UNITED STATES BANKRUPTCY JUDGE

³ Calculated pursuant to Bankruptcy Rule 9006.