

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.<sup>1</sup> : (Jointly Administered)  
----- X

**NOTICE REGARDING REJECTION OF EXECUTORY CONTRACTS  
WITH PRN AMBULANCE LLC AND PROTRANSPORT-1 LLC  
[Relates to Docket Nos. 605, 1055, 1206, & 1328]**

**PLEASE TAKE NOTICE THAT**, on October 30, 2025, the Reorganized Debtors<sup>2</sup> filed the *Notice of Potential Assumption of Certain of Debtors’ Executory Contracts and Unexpired Leases* [Docket No. 605] (the “**Cure Notice**”) listing certain executory contracts and unexpired leases (those executory contracts and unexpired leases identified on the Cure Notice, collectively, the “**Potentially Assumed Contracts**”), and their respective Proposed Cures, that the Reorganized Debtors intended to assume as part of the Chapter 11 Cases. The executory contracts with PRN Ambulance LLC and ProTransport-1 LLC (collectively, “**PRN**” and such agreements, the “**PRN Contracts**”), are listed as Potentially Assumed Contracts in the Cure Notice. The Cure Notice stated the Proposed Cures for the PRN Contracts was \$0.

**PLEASE TAKE FURTHER NOTICE THAT**, the deadline for the counterparties to the Potentially Assumed Contracts (the “**Counterparties**”) to file an objection (including any informal comments or objections received by the Reorganized Debtors, “**Cure Objections**”) to the assumption of the Potentially Assumed Contracts or the Proposed Cures for such Potentially Assumed Contracts was November 17, 2025 (the “**Objection Deadline**”).

**PLEASE TAKE FURTHER NOTICE THAT**, on November 14, 2025, PRN filed the *Limited Objection of Counterparties Prn Ambulance, LLC and Protransport-1 LLC to Debtors’ Notice of Potential Assumption of Certain Executory Contracts and Unexpired Leases and Cure Amounts* [Docket No. 721] (the “**PRN Objection**”), which did not object to the assumption by the Reorganized Debtors of the PRN Contracts. Instead, the PRN Objection

<sup>1</sup> 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>. Debtor ModivCare Inc.’s principal place of business and the Debtors’ service address in the Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Cure Notice or the Confirmation Order, as applicable.



avored assumption of the PRN Contracts, but asserted a cure amount of \$1,139,603.57 as of November 13, 2025.

**PLEASE TAKE FURTHER NOTICE THAT**, on December 5, 2025, the Reorganized Debtors filed the *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates* [Docket No. 959] (the “**Plan**”). Before and after entry of the Confirmation Order (as defined herein), PRN continued to provide services to the Reorganized Debtors and the Reorganized Debtors continued to pay valid claims for such services in the ordinary course of business.

**PLEASE TAKE FURTHER NOTICE THAT**, on December 15, 2025, the Court entered the *Order (I) Confirming 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**”). The Confirmation Order provides that the Reorganized Debtors must file a notice of dispute with the Court (and promptly serve such notice on the applicable counterparty) by January 28, 2026, if any dispute regarding the assumption, or assumption and assignment, of the Potentially Assumed Contracts, including, without limitation, the Proposed Cure or the applicable Reorganized Debtor’s ability to provide adequate assurance of future performance, could not be resolved consensually the applicable parties. *See Confirmation Order*, ¶ 36.

**PLEASE TAKE FURTHER NOTICE THAT**, on January 28, 2026, the Reorganized Debtors filed the *Notice Regarding the Status of Various Cure Objections* [Docket No. 1206] (the “**First Cure Status Notice**”), which stated, among other things, the Reorganized Debtors remain in active negotiations with PRN regarding the PRN Objection. The First Cure Status Notice did not list a Proposed Cure amount for the PRN Contracts. The ending paragraphs of the First Cure Status Notice reserved the Reorganized Debtors’ right to reject executory contracts. During February 2026, the parties continued discussions aimed at resolving the PRN Objection and PRN continued to provide services to the Reorganized Debtors and the Reorganized Debtors continued to pay valid claims for such services in the ordinary course of business.

**PLEASE TAKE FURTHER NOTICE THAT**, on February 27, 2026, the Reorganized Debtors filed the *Second Notice Regarding the Status of Various Cure Objections* [Docket No. 1328] (the “**Second Cure Status Notice**”), which was similar to the First Cure Status Notice. The Second Cure Status Notice also provided that if the Reorganized Debtors could not reach a consensual resolution with PRN relating to the assumption of the PRN Contracts, the Reorganized Debtors would file a supplemental notice by March 13, 2026, providing the Court with a further update as to the status of such Cure Objections. On March 9, 2026, rather than litigate the PRN Objection, the Reorganized Debtors informed PRN of its decision to reject the contract pursuant to the Plan due to an inability to resolve the outstanding PRN Objection. *See Plan*, Section 8.9(d). The Reorganized Debtors and PRN remain in discussions regarding a potential resolution of PRN’s claims resulting from the rejection of the PRN Contracts and any services provided thereunder. The Reorganized Debtors and PRN both

reserve their rights to the fullest extent under applicable law. The Reorganized Debtors have discussed this notice with PRN and shall ensure that PRN is served with a copy of this Notice.

All documents filed with the Court in connection with the above-captioned Chapter 11 Cases, including the Plan, the Cure Notice, and the Confirmation Order may be obtained free of charge by visiting the solicitation website maintained by the Reorganized Debtors' balloting and solicitation agent, Kurtzman Carson Consultants, LLC (d/b/a Verita Global), at <https://www.veritaglobal.net/ModivCare>. Copies of the Plan and Disclosure Statement may also be obtained by calling the Solicitation Agent at (888) 733-1521 (U.S./Canada) or +1 (310) 751-2636 (International) or submitting an inquiry at <https://www.veritaglobal.net/ModivCare/Inquiry>. You may also obtain these documents and any other pleadings filed in the Reorganized Debtors' Chapter 11 Cases (for a fee) at: [www.txs.uscourts.gov](http://www.txs.uscourts.gov).

*[Remainder of page intentionally left blank]*

Dated: March 19, 2026  
Houston, Texas

Respectfully submitted,

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

---

**HUNTON ANDREWS KURTH LLP**

Timothy A. ("Tad") Davidson II (Texas Bar No. 24012503)

Catherine A. Rankin (Texas Bar No. 24109810)

Brandon Bell (Texas Bar No. 24127019)

600 Travis Street, Suite 4200

Houston, TX 77002

Telephone: (713) 220-4200

Email: [taddavidson@hunton.com](mailto:taddavidson@hunton.com)

[crankin@hunton.com](mailto:crankin@hunton.com)

[bbell@hunton.com](mailto:bbell@hunton.com)

- and -

**LATHAM & WATKINS LLP**

Ray C. Schrock (NY Bar No. 4860631)

Keith A. Simon (NY Bar No. 4636007)

George Klidonas (NY Bar No. 4549432)

Jonathan J. Weichselbaum (NY Bar No. 5676143)

1271 Avenue of the Americas

New York, NY 10020

Telephone: (212) 906-1200

Email: [ray.schrock@lw.com](mailto:ray.schrock@lw.com)

[keith.simon@lw.com](mailto:keith.simon@lw.com)

[george.klidonas@lw.com](mailto:george.klidonas@lw.com)

[jon.weichselbaum@lw.com](mailto:jon.weichselbaum@lw.com)

*Co-Counsel for the Reorganized Debtors*

**CERTIFICATE OF SERVICE**

I certify that on March 19, 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*

Timothy A. ("Tad") Davidson II