

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

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In re:	: Chapter 11
	:
MODIVCARE INC., <i>et al.</i> ,	: Case No. 25-90309 (ARP)
	:
Reorganized Debtors. <sup>1</sup>	: (Jointly Administered)
	:
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**REORGANIZED DEBTORS' THIRD  
OMNIBUS OBJECTION TO CERTAIN CLAIMS (LATE-FILED CLAIMS)**

**THIS IS AN OBJECTION TO YOUR CLAIM. THIS OBJECTION ASKS THE COURT TO DISALLOW THE CLAIM THAT YOU FILED IN THE 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.**

**TO THE CLAIMANTS WHOSE CLAIMS ARE SUBJECT TO THIS OBJECTION:**

**YOUR SUBSTANTIVE RIGHTS MAY BE AFFECTED BY THIS OBJECTION AND ANY FURTHER OBJECTIONS THAT MAY BE FILED IN THE CHAPTER 11 CASES.**

**THE RELIEF SOUGHT IN THIS OBJECTION IS WITHOUT PREJUDICE TO THE RIGHTS OF THE REORGANIZED DEBTORS AND THEIR ESTATES OR OTHER PARTIES IN INTEREST TO PURSUE FURTHER OBJECTIONS AGAINST THE CLAIMS LISTED HEREIN AND OTHER CLAIMS FILED IN THE CHAPTER 11 CASES.**

<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>. 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.



The above-captioned reorganized debtors (prior to the Effective Date,<sup>2</sup> collectively, the “*Debtors*” and after the Effective Date, collectively, the “*Reorganized Debtors*”) respectfully state the following in support of this omnibus claims objection (this “*Objection*”).

### **RELIEF REQUESTED**

1. By this Objection, the Reorganized Debtors seek entry of an order substantially in the form attached hereto (the “*Proposed Order*”) disallowing the claims listed on **Schedule 1** (the “*Late-Filed Claims*”) to the Proposed Order in their entirety because each of the Late-Filed Claims was filed after the applicable Claims Bar Date.

### **JURISDICTION AND VENUE**

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

3. Each of the Late-Filed Claims that are the subject of this Objection were asserted on proof of claim forms (each a “*Proof of Claim*” and collectively the “*Claim Forms*”) filed with the Claims and Noticing Agent (as defined below). By seeking recovery from the Reorganized Debtors’ estates based on the filing of a Proof of Claim, the holders of the Late-Filed Claims (each a “*Claimant*” and collectively the “*Claimants*”) have submitted to the Court’s jurisdiction over this matter.

4. Venue of the Chapter 11 Cases and this Objection in this district is proper under 28 U.S.C. §§ 1408 and 1409.

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<sup>2</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 1055, Ex. A] (together with all supplemental or supporting documentation related thereto, the “*Plan*”), as applicable.

5. The statutory and legal predicates for the relief requested herein are sections 105(a) and 502 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “**Bankruptcy Code**”), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), Rule 3007-1 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**

6. On August 20, 2025, the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Chapter 11 Cases are being jointly administered, for procedural purposes only, pursuant to Rule 1015(b) of the Bankruptcy Rules and Rule 1015-1 of the Bankruptcy Local Rules. 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].

7. On December 15, 2025, the Court entered the Confirmation Order<sup>3</sup> which, among other things, confirmed the Plan. The Effective Date occurred on December 29, 2025.

### **CLAIMS RECONCILIATION PROCESS**

8. 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 “**Claims Bar Date Order**”) setting, *inter alia*, October 1, 2025, as the deadline for non-governmental creditors and interest holders to file claims in the Chapter 11 Cases (the “**General Bar Date**”).

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<sup>3</sup> Docket No. 1055.

9. 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 a Proof of Claim on account of such claim was February 16, 2026, at 5:00 p.m. (prevailing Central Time) (the “**Governmental Bar Date**” and together with the General Bar Date, as applicable depending on whether the claimant is a governmental unit or non-governmental unit, the “**Claims Bar Date**”).

10. The Claims Bar Date Order establishes certain requirements that a filed claim must satisfy to be considered valid. A filed claim must, among other things, “set forth with specificity the legal and factual basis for the alleged claim,” and “include supporting documentation or an explanation as to why such documentation is not available.” Claims Bar Date Order, ¶ 7. If such filed claims are not properly submitted prior to the Claims Bar Date, the Claims Bar Date Order provides that the relevant claimant “shall not be treated as a creditor with respect to such claim for purposes of voting and **distribution**.” *Id.* at ¶ 20 (emphasis added).

11. On August 23, 2025, the Reorganized Debtors’ claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global (the “**Claims and Noticing Agent**”), mailed notice of the Claims Bar Date (the “**Bar Date Notice**”) to potential claimants in accordance with the procedures set forth in the Claims Bar Date Order. *See Affidavit of Service* [Docket No. 98]. Also, as certified at Docket No. 142, in accordance with the Claims Bar Date Order, the Reorganized Debtors published the Bar Date Notice in *The New York Times* on August 26, 2025. *See Affidavit of Publication of the Notice of Deadline for the Filing of Proofs of Claim, Including for Claims Asserted Under Section 503(b)(9) of the Bankruptcy Code in the New York Times* [Docket No. 142].

12. The Reorganized Debtors also listed numerous claims in their Schedules<sup>4</sup> (such claims, along with the claims asserted in each proof of claim filed in the Chapter 11 Cases, collectively, the “**Claims**”), some of which have been satisfied under the authority granted to the Reorganized Debtors pursuant to certain “first day” orders and other orders entered in these Chapter 11 Cases. A database of all Claims is being maintained by the Reorganized Debtors’ Claims and Noticing Agent (the “**Claims Register**”).<sup>5</sup> Pursuant to the Plan, the Claims Objection Deadline is currently, subject to the Reorganized Debtors’ right to seek a further extension of such deadline in accordance with the Plan,<sup>6</sup> March 29, 2026 (*i.e.*, the date that is ninety (90) days after the occurrence of the Effective Date).<sup>7</sup>

13. On February 19, 2026, the Court entered the *Order Approving Procedures for Reorganized Debtors’ Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1313] (the “**Omnibus Objection Procedures Order**”) approving the procedures for filing and resolving omnibus objections to Claims asserted against the Reorganized Debtors in the Chapter 11 Cases appended to the Omnibus Objection Procedures Order as Exhibit 1 (the “**Objection Procedures**”). The Objection Notice (as defined in the Objection Procedures) and the Objection Procedures will be served on the holders of the Late-Filed Claims along with this Objection.

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<sup>4</sup> On September 7, 2025, the Reorganized Debtors filed their respective schedules of assets and liabilities (the “**Schedules**”) and statements of financial affairs [Docket Nos. 177–322], pursuant to Bankruptcy Rule 1007.

<sup>5</sup> Under section 1111(a) of the Bankruptcy Code, scheduled claims are treated as proofs of claim. *See* 11 U.S.C. § 1111(a) (“A proof of claim . . . is deemed filed under section 501 of this title for any claim . . . that appears in the schedules . . . except a claim . . . that is scheduled as disputed, contingent, or unliquidated.”).

<sup>6</sup> *See* Plan, p. 3 (defining “Claims Objection Deadline” as “ninety (90) days after the Effective Date . . . which dates may be extended pursuant to an order of the Bankruptcy Court upon a motion Filed by the Reorganized Debtors.”).

<sup>7</sup> The Claims Objection Deadline with respect to claims filed by governmental units is ninety (90) days after the Governmental Bar Date, whereas for claims filed by non-governmental units it is ninety (90) days after the occurrence of the Effective Date.

**THE LATE-FILED CLAIMS**

14. The Reorganized Debtors' review of the Claims Register allowed them to identify the Late-Filed Claims. This Objection seeks to disallow the Late-Filed Claims in their entirety because each Late-Filed Claim was filed after the applicable Bar Date.

15. As attested to in the *Affidavit of Kenneth Shepard in Support of Debtors' Third Omnibus Objection to Certain Claims* attached hereto as **Exhibit A**, based on their review of the Claims Register, the Reorganized Debtors and their advisors identified each Late-Filed Claim on **Schedule 1** to the Proposed Order as being filed after the occurrence of the applicable Claims Bar Date. To identify the Late-Filed Claims, the Reorganized Debtors:

- (a) reviewed the Claims Register to identify instances in which a Claim was submitted after the applicable Claims Bar Date; and
- (b) determined that there were no agreements or other arrangements between the holder of a Late-Filed Claim and the Reorganized Debtors to allow the filing of a Claim after the relevant Claims Bar Date.

16. The Reorganized Debtors hereby request that the Late-Filed Claims be disallowed in their entirety and expunged.

**BASIS FOR RELIEF**

17. Section 502 of the Bankruptcy Code provides, in pertinent part, that: “[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest ... objects.” 11 U.S.C. § 502. Moreover, section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed if “such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law ....” 11 U.S.C. § 502(b)(1). Bankruptcy Rule 3007 provides certain grounds upon which “objections to more than one claim may be joined in a single objection.” FED. R. BANKR. P.

3007(d). This includes objections on the grounds that claims should be disallowed because they “were not timely filed.” FED. R. BANKR. P. 3007(d)(2)(D).

18. As set forth in Bankruptcy Rule 3001(f), a properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and the amount of the claim under section 502(a) of the Bankruptcy Code. *See, e.g., In re Jack Kline Co., Inc.*, 440 B.R. 712, 742 (Bankr. S.D. Tex. 2010). A proof of claim loses the presumption of *prima facie* validity under Bankruptcy Rule 3001(f) if an objecting party refutes at least one of the allegations that are essential to the claim’s legal sufficiency. *See In re Fidelity Holding Co., Ltd.*, 837 F.2d 696, 698 (5th Cir. 1988). Once such an allegation is refuted, the burden reverts to the claimant to prove the validity of its claim by a preponderance of the evidence. *Id.* Despite this shifting burden during the claim objection process, “the ultimate burden of proof always lies with the claimant.” *In re Armstrong*, 347 B.R. 581, 583 (Bankr. N.D. Tex. 2006) (citing *Raleigh v. Ill. Dep’t of Rev.*, 530 U.S. 15 (2000)).

19. Here, the Court established, pursuant to the Claims Bar Date Order, the Claims Bar Date as the deadline by which creditors were required to file a Proof of Claim conforming to the requirements set forth in the Claims Bar Date Order. The Claims Bar Date Order, in turn, expressly provides that the timely filing of a Proof of Claim was a prerequisite “in order to share in the Debtors’ estates,” Claims Bar Date Order, ¶ 5, and expressly provides that a creditor who failed to timely file a Proof of Claim “shall not be treated as a creditor with respect to such claim for purposes of voting and distribution.” *Id.* at ¶ 20. As set forth above, the Late-Filed Claims were not filed by the applicable Claims Bar Date, and, thus, are subject to disallowance under the express terms of the Claims Bar Date Order.

20. Therefore, pursuant to section 502(b) of the Bankruptcy Code, Bankruptcy Rule 3007, and the Plan, the Reorganized Debtors respectfully request that the Court enter the Proposed Order granting the relief requested herein.

**RESERVATION OF RIGHTS**

21. The Reorganized Debtors reserve the right to amend, modify, or supplement this Objection, and to file additional objections to any other Claims (filed or not) that may be asserted against the Reorganized Debtors and their estates. Should one or more of the grounds of objection stated in the Objection be dismissed or overruled, the Reorganized Debtors reserve the right to object to each of the Late-Filed Claims or any other Claims on any other grounds that the Reorganized Debtors discover or elect to pursue.

22. Nothing contained herein shall be deemed: (a) an admission as to the amount of, basis for, or validity of any Claim against the Reorganized Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) an impairment or waiver of the Reorganized Debtors' or any other party in interest's right to dispute any Claim against, or interest in, the Reorganized Debtors, or their property or estates; (c) a promise or requirement to pay any prepetition Claim; (d) an implication or admission that any particular Claim is of a type specified or defined in this Objection, or any order granting the relief requested by this Objection; (e) an implication, admission, or finding as to (i) the validity, enforceability, or perfection of any interest or encumbrance on the property of the Reorganized Debtors or their estates or (ii) the applicability of any exception or exclusion from property of the estate under section 541 of the Bankruptcy Code or other applicable law; (f) an impairment or waiver of any claims or causes of action which may exist against any entity; or (g) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable law.

**NOTICE**

23. Notice of this Objection will be given to the Claimants, the parties on the Reorganized Debtors' Master Service List, and all parties that have requested or that are required to receive notice pursuant to Bankruptcy Rule 2002. The Reorganized Debtors submit that, under the circumstances, no other or further notice is required.

24. A copy of this Objection is available on (a) the Court's website, at [www.txs.uscourts.gov](http://www.txs.uscourts.gov) and (b) the website maintained by the Claims and Noticing Agent at <https://www.veritaglobal.net/ModivCare>.

**WHEREFORE**, the Reorganized Debtors respectfully request that the Court enter the Proposed Order sustaining the Objection and granting such other and further relief as may be just and proper.

Dated: March 26, 2026

Respectfully submitted,

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

**HUNTON ANDREWS KURTH LLP**

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*Co-Counsel for the Reorganized Debtors*

**CERTIFICATE OF SERVICE**

I certify that on March 26, 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

**Exhibit A**

**Shepard Declaration**

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

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

**AFFIDAVIT OF KENNETH SHEPARD  
IN SUPPORT OF REORGANIZED DEBTORS’  
THIRD OMNIBUS OBJECTION TO CERTAIN CLAIMS**

I, Kenneth Shepard, hereby declare as follows:

1. I submit this affidavit (this “*Affidavit*”) in support of the *Reorganized Debtors’ Third Omnibus Objection to Certain Claims* (the “*Objection*”)<sup>2</sup> pursuant to Rule 3007-1 of the Local Bankruptcy Rules for the Southern District of Texas.

2. I am a senior vice president of finance for the Reorganized Debtors a role that I have served in for approximately two years. I have worked for the Reorganized Debtors for over ten years and in finance for approximately 20 years.

3. I am knowledgeable about, and familiar with, the Reorganized Debtors’ day-to-day operations, business and financial affairs, books and records, and the circumstances that led to the commencement of the Chapter 11 Cases. The facts set forth in this Declaration are based upon

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<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 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.

<sup>2</sup> Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Objection.

my personal knowledge, my review of relevant documents, information provided to me by employees working under my supervision, my own reasonable inquiry, and/or my discussions with the Reorganized Debtors' other officers, directors, and restructuring advisors, including professionals at Latham & Watkins LLP, Hunton Andrews Kurth LLP, Moelis & Company, FTI Consulting, Inc., and Kurtzman Carson Consultants, LLC d/b/a Verita Global. If called upon to testify, I would testify to the facts set forth in this Affidavit. I am authorized to submit this Affidavit.

**OBJECTION TO LATE-FILED CLAIMS**

4. Article VII of the Plan empowers the Reorganized Debtors to undertake a claims allowance process. Thus, pursuant to the Plan, the Reorganized Debtors and their advisors have identified certain Late-Filed Claims which they seek the disallowance of in their entirety.

5. The Late-Filed Claims were identified after the Reorganized Debtors:

- (a) reviewed the Claims Register to identify instances in which more a Claim was submitted after the applicable Bar Date; and
- (b) determined that there were no agreements or other arrangements between the Holder of a Late-Filed Claim and the Reorganized Debtors to allow the filing of a Claim after the Claims Bar Date.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Dated: March 26, 2026

*/s/ Kenneth Shepard*

Name: Kenneth Shepard

Title: Senior Vice President – Finance  
ModivCare Solutions, LLC and its  
Reorganized Debtor Affiliates

**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. <sup>1</sup>	:	(Jointly Administered)
	:	
	x	

**ORDER GRANTING REORGANIZED DEBTORS’  
THIRD OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM**  
[Relates to Docket No. ]

Upon the objection (the “*Objection*”)<sup>2</sup> of the Reorganized Debtors seeking entry of an order (this “*Order*”) disallowing the Late-Filed Claims in their entirety as set forth in **Schedule 1** hereto, all as more fully set forth in the Objection; and the Court having reviewed the Objection; and the Court having jurisdiction to consider the Objection 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 proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Objection and opportunity for a hearing on the Objection were appropriate under the circumstances and that no other or further notice is necessary, except as set forth in this Order; and all responses, if any, to the Objection having been withdrawn, resolved, or overruled; and upon the record herein; and upon the record herein; and after due deliberation

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<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 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 1100, Denver, Colorado 80237.

<sup>2</sup> Capitalized terms used but not defined herein have the meanings ascribed to them in the Objection.

thereon; and the Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and the Court having determined that the relief requested in the Objection 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. The Objection is GRANTED, as set forth herein.
2. Each Late-Filed Claim listed on Schedule 1 is disallowed and expunged in its entirety.
3. The Claims and Noticing Agent is authorized to update the claims register maintained in the Chapter 11 Cases to reflect the relief granted in this Order.
4. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in the Objection or this Order shall be deemed a waiver of the rights of the Reorganized Debtors to object to any Claim, and shall not constitute an admission of liability by the Reorganized Debtors with respect to any Proof of Claim or application for administrative expenses.
5. Each Late-Filed Claim and the Reorganized Debtors' objections to each Late-Filed Claim constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each Late-Filed Claim.
6. Nothing in the Objection or this Order shall be deemed or construed: (a) as an admission as to the validity of any Claim against the Reorganized Debtors; (b) as a waiver of the Reorganized Debtors' rights to dispute or otherwise object to any Claim on any grounds or basis; or (c) to waive or release any right, claim, defense, or counterclaim of the Reorganized Debtors,

or to estop the Reorganized Debtors from asserting any right, claim, defense, or counterclaim (including setoff).

7. Notice of the Objection as provided therein shall be deemed good and sufficient and the requirements of the Bankruptcy Rules and the Bankruptcy Local Rules are satisfied by such notice.

8. Notwithstanding any applicable Bankruptcy Rules to the contrary, the terms and conditions of this Order are immediately effective and enforceable upon its entry.

9. The Reorganized Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Objection.

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

Signed: \_\_\_\_\_, 2026

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UNITED STATES BANKRUPTCY JUDGE

**SCHEDULE 1**

Late Filed Claims						
#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
1	3 VETS & COMPANY LLC	ModivCare Inc.	2026	10/30/2025	General Unsecured Priority Secured Admin Priority Total	12,500 - - - \$ 12,500
2	Aaron, Peggy	ModivCare Inc.	2212	10/21/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
3	ACTIVE TRANSPORTATION LLC	ModivCare Inc.	1805	10/7/2025	General Unsecured Priority Secured Admin Priority Total	15,475 - - - \$ 15,475
4	Administrative Services Cooperative, Inc.	ModivCare Inc.	2362	2/4/2026	General Unsecured Priority Secured Admin Priority Total	- - - 105,611 \$ 105,611
5	ADP INC	ModivCare Inc.	2043	10/31/2025	General Unsecured Priority Secured Admin Priority Total	2,115 - - - \$ 2,115
6	ADVANCED FLOORING SOLUTIONS	ModivCare Solutions, LLC	1878	10/10/2025	General Unsecured Priority Secured Admin Priority Total	- - - 17,375 \$ 17,375
7	ADVANCED FLOORING SOLUTIONS	ModivCare Solutions, LLC	1874	10/10/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
8	Agee, Adrienne	ModivCare Inc.	2428	2/5/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
9	Al Omour, Jamal	ModivCare Inc.	1814	10/7/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
10	Alderman, Timmy	ModivCare Inc.	1733	10/3/2025	General Unsecured Priority Secured Admin Priority Total	693 - - - \$ 693

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Clam No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
11	Alle, Amey	ModivCare Inc.	2412	2/4/2026	General Unsecured Priority Secured Admin Priority Total	3,233 - - - \$ 3,233
12	Allied Fire & Safety Equipment Co., Inc.	Care Finders Total Care LLC	2058	11/7/2025	General Unsecured Priority Secured Admin Priority Total	667 - - - \$ 667
13	AMBULNZ NY, LLC	ModivCare Solutions, LLC	2411	2/4/2026	General Unsecured Priority Secured Admin Priority Total	867,749 - - - \$ 867,749
14	American Ground Transportation	ModivCare Solutions, LLC	2097	11/17/2025	General Unsecured Priority Secured Admin Priority Total	397,872 - - - \$ 397,872
15	American Medical Response Ambulance Service, Inc.	ModivCare Inc.	2310	1/28/2026	General Unsecured Priority Secured Admin Priority Total	303,217 - - - \$ 303,217
16	American Medical Response Mid-Atlantic, Inc.	ModivCare Inc.	2311	1/28/2026	General Unsecured Priority Secured Admin Priority Total	66,607 - - - \$ 66,607
17	American Medical Response of Inland Empire	ModivCare Inc.	2312	1/28/2026	General Unsecured Priority Secured Admin Priority Total	85,431 - - - \$ 85,431
18	American Medical Response of New York, LLC	ModivCare Inc.	2313	1/28/2026	General Unsecured Priority Secured Admin Priority Total	36,557 - - - \$ 36,557
19	American Medical Response of Southern California	ModivCare Inc.	2314	1/28/2026	General Unsecured Priority Secured Admin Priority Total	142,745 - - - \$ 142,745
20	American Medical Response West	ModivCare Inc.	2315	1/28/2026	General Unsecured Priority Secured Admin Priority Total	436,968 - - - \$ 436,968

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Clam No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
21	Antigua, Karin	ModivCare Solutions, LLC	1854	10/8/2025	General Unsecured Priority Secured Admin Priority Total	77 - - - \$ 77
22	Archuleta, Devon L	ModivCare Inc.	1837	10/8/2025	General Unsecured Priority Secured Admin Priority Total	3,219 - - - \$ 3,219
23	Armada, Anthony	ModivCare Solutions, LLC	2132	11/25/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
24	Ashford, Janet	ModivCare Inc.	2262	1/13/2026	General Unsecured Priority Secured Admin Priority Total	213 - - - \$ 213
25	Atherton, April	ModivCare Inc.	2225	12/28/2025	General Unsecured Priority Secured Admin Priority Total	250 - - - \$ 250
26	Atlantic/Palm Beach Ambulance, Inc.	ModivCare Inc.	2316	1/28/2026	General Unsecured Priority Secured Admin Priority Total	1,699 - - - \$ 1,699
27	Avila, Claudia	ModivCare Inc.	1906	10/14/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
28	B and S Properties	ModivCare Inc.	1846	10/8/2025	General Unsecured Priority Secured Admin Priority Total	14,912 - - - \$ 14,912
29	Baker Hostetler LLP	ModivCare Solutions, LLC	2387	2/4/2026	General Unsecured Priority Secured Admin Priority Total	- - - 60,000 \$ 60,000
30	Bankes, Brooke	CareGivers America Home Health Services, LLC	2238	1/6/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Clam No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
31	Barczak, Cassie	ModivCare Solutions, LLC	2175	12/11/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
32	Baxter, Tommie	ModivCare Solutions, LLC	1740	10/3/2025	General Unsecured Priority Secured Admin Priority Total	55 - - - \$ 55
33	Bell, Donna	ModivCare Inc.	1751	10/3/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
34	Benally, Delores Jane	ModivCare Inc.	2127	11/24/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
35	Benjamin, Torrence	ModivCare Solutions, LLC	2042	11/4/2025	General Unsecured Priority Secured Admin Priority Total	1,000 - - - \$ 1,000
36	Bennett, Phyllis	ModivCare Inc.	2008	10/27/2025	General Unsecured Priority Secured Admin Priority Total	- - - 350,000 \$ 350,000
37	Berkheimer, Melissa	CareGivers America Home Health Services, LLC	1836	10/8/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
38	Betts, Suzanne (Administrator of the Estate of Frances Betts, Deceased)	ModivCare Inc.	2319	1/28/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
39	Bhutto, Kamran	ModivCare Inc.	2019	10/29/2025	General Unsecured Priority Secured Admin Priority Total	866 - - - \$ 866
40	Biamonte Goldman, Susan	ModivCare Solutions, LLC	2296	1/25/2026	General Unsecured Priority Secured Admin Priority Total	- 5,000 - - \$ 5,000

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41	Bivins, Joseph	ModivCare Inc.	1706	10/2/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
42	Bland, Bobby	ModivCare Inc.	1972	10/20/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
43	Blankenship, Chad	ModivCare Inc.	2126	11/24/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
44	Blythe Ambulance Service	ModivCare Inc.	2321	1/28/2026	General Unsecured Priority Secured Admin Priority Total	1,272 - - - \$ 1,272
45	Bonamou, Angeline	ModivCare Inc.	2244	1/12/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
46	Bozinta, Justin	ModivCare Inc.	2037	11/3/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
47	Bradley, Jennifer	ModivCare Inc.	2431	2/5/2026	General Unsecured Priority Secured Admin Priority Total	192 - - - \$ 192
48	Brady, Keslea	ModivCare Inc.	2280	1/19/2026	General Unsecured Priority Secured Admin Priority Total	75 - - 800 \$ 875
49	Brennen, Byron	ModivCare Inc.	2014	10/28/2025	General Unsecured Priority Secured Admin Priority Total	5,000 - - - \$ 5,000
50	Brinegar, James Travis	ModivCare Inc.	1761	10/5/2025	General Unsecured Priority Secured Admin Priority Total	398 - - - \$ 398

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51	Broward Ambulance, Inc.	ModivCare Inc.	2329	1/28/2026	General Unsecured Priority Secured Admin Priority Total	1,148 - - - \$ 1,148
52	Brown, Patti	ModivCare Inc.	2283	1/20/2026	General Unsecured Priority Secured Admin Priority Total	1,400 - - - \$ 1,400
53	Burns, Imogene	Guardian Medical Monitoring, LLC	1973	10/20/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
54	Burns, Kovey	ModivCare Inc.	2227	12/29/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
55	Burton, Tashica	ModivCare Inc.	1930	10/15/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
56	Byerly, Crawford	ModivCare Inc.	2307	1/27/2026	General Unsecured Priority Secured Admin Priority Total	82,850 17,150 - - \$ 100,000
57	Byrd, Aulinda	ModivCare Inc.	1775	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
58	Cales, Jewel	ModivCare Inc.	1945	10/17/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
59	Callaham, Felicia	ModivCare Inc.	2066	11/9/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
60	CALSTAR Air Medical Services LLC	ModivCare Inc.	2422	2/5/2026	General Unsecured Priority Secured Admin Priority Total	45,052 - - - \$ 45,052

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61	Careficient, Inc.	Multicultural Home Care Inc.	1870	10/10/2025	General Unsecured Priority Secured Admin Priority Total	534 - - - \$ 534
62	Carestar, LLC	ModivCare Inc.	2334	1/30/2026	General Unsecured Priority Secured Admin Priority Total	42,099 - - - \$ 42,099
63	Carl, Nancy	CareGivers America Home Health Services, LLC	1840	10/8/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
64	Carrejo, Valerie	ModivCare Solutions, LLC	2117	11/22/2025	General Unsecured Priority Secured Admin Priority Total	1 8,859 - - \$ 8,860
65	Carrejo, Valerie	ModivCare Inc.	2230	12/31/2025	General Unsecured Priority Secured Admin Priority Total	1 8,859 - - \$ 8,860
66	Carson, Chirsty	ModivCare Inc.	2353	2/3/2026	General Unsecured Priority Secured Admin Priority Total	150 - - - \$ 150
67	Castillo Rodriguez, Milagros	ModivCare Inc.	1697	10/2/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
68	Castro, Nahum	ModivCare Inc.	2289	1/21/2026	General Unsecured Priority Secured Admin Priority Total	920 - - - \$ 920
69	Caudill, Maria	ModivCare Inc.	2247	1/12/2026	General Unsecured Priority Secured Admin Priority Total	43 - - - \$ 43
70	Cellco Partnership d/b/a Verizon Wireless	ModivCare Inc.	1849	10/7/2025	General Unsecured Priority Secured Admin Priority Total	58,310 - - - \$ 58,310

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71	Centurion Transportation LLC	ModivCare Inc.	2113	11/20/2025	General Unsecured Priority Secured Admin Priority Total	- - - 384 \$ 384
72	Certify My Company	ModivCare Inc.	2425	2/5/2026	General Unsecured Priority Secured Admin Priority Total	11,943 - - - \$ 11,943
73	Charkhchian, Shooshanik	ModivCare Inc.	1914	10/13/2025	General Unsecured Priority Secured Admin Priority Total	5,000,000 - - - \$ 5,000,000
74	Charlip, Edward	ModivCare Inc.	1842	10/8/2025	General Unsecured Priority Secured Admin Priority Total	1,035 - - - \$ 1,035
75	CHAUFFEURED SENIORS LLC	ModivCare Solutions, LLC	1767	10/5/2025	General Unsecured Priority Secured Admin Priority Total	2,000 - - - \$ 2,000
76	Chavez, Felicia Marie	ModivCare Inc.	2177	12/11/2025	General Unsecured Priority Secured Admin Priority Total	- - - 8,000 \$ 8,000
77	Chen, Yun	ModivCare Inc.	2248	1/12/2026	General Unsecured Priority Secured Admin Priority Total	30 - - - \$ 30
78	Chi-wai, Lui	ModivCare Inc.	2011	10/24/2025	General Unsecured Priority Secured Admin Priority Total	- - - 13,000 \$ 13,000
79	Citizens Community Transport, LLC	ModivCare Inc.	2301	1/26/2026	General Unsecured Priority Secured Admin Priority Total	6,081 - - - \$ 6,081
80	Clark, Betty	ModivCare Inc.	2241	1/12/2026	General Unsecured Priority Secured Admin Priority Total	506 - - - \$ 506

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					Claim Nature	Claim Amount
81	Clark, Kenyatta	ModivCare Inc.	2016	10/28/2025	General Unsecured Priority Secured Admin Priority Total	330 - - - \$ 330
82	Clay, Hannah	ModivCare Inc.	2434	2/8/2026	General Unsecured Priority Secured Admin Priority Total	- - 650,654 - \$ 650,654
83	Clear, Elana Jones	ModivCare Inc.	2102	11/17/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
84	Coastal Medical Transport Inc	ModivCare Inc.	2040	11/3/2025	General Unsecured Priority Secured Admin Priority Total	56,034 - - - \$ 56,034
85	Cofield, Cheryl	ModivCare Inc.	1887	10/11/2025	General Unsecured Priority Secured Admin Priority Total	200 - - - \$ 200
86	Colker, Jean	ModivCare Inc.	1796	10/6/2025	General Unsecured Priority Secured Admin Priority Total	50,000 - - - \$ 50,000
87	COLOGIX US, INC.	Valued Relationships, Inc.	2298	1/26/2026	General Unsecured Priority Secured Admin Priority Total	6,539 - - - \$ 6,539
88	COMFORT HEALTHCARE SOLUTIONS LLC	ModivCare Solutions, LLC	1940	10/16/2025	General Unsecured Priority Secured Admin Priority Total	35,000 - - - \$ 35,000
89	Conrady Arrington, Susan	ModivCare Inc.	1879	10/10/2025	General Unsecured Priority Secured Admin Priority Total	72 - - - \$ 72
90	Cooper, Scarlett	ModivCare Inc.	2416	2/5/2026	General Unsecured Priority Secured Admin Priority Total	3,039 - - - \$ 3,039

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91	Copeland, Tamika J	ModivCare Inc.	2020	10/29/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
92	Cordova, Angie	ModivCare Inc.	1776	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
93	Corona, Patricia	ModivCare Inc.	1960	10/17/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
94	Corrigan, Patricia	ModivCare Inc.	1759	10/4/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
95	Courtney, Patricia	ModivCare Inc.	2274	1/19/2026	General Unsecured Priority Secured Admin Priority Total	160 - - - \$ 160
96	Crump, Melodia	ModivCare Solutions, LLC	1992	10/24/2025	General Unsecured Priority Secured Admin Priority Total	- 200 - - \$ 200
97	CyraCom International, Inc.	VRI Intermediate Holdings, LLC	2157	12/2/2025	General Unsecured Priority Secured Admin Priority Total	6,259 - - - \$ 6,259
98	Dahl, Richard A	ModivCare Inc.	1819	10/7/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
99	Daniels Martin, Lyndsey	ModivCare Inc.	1886	10/11/2025	General Unsecured Priority Secured Admin Priority Total	4 - - 595 \$ 599
100	Daris, Lacie	ModivCare Inc.	2001	10/27/2025	General Unsecured Priority Secured Admin Priority Total	210 - - - \$ 210