

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

**REORGANIZED DEBTORS' FOURTH
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.

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.



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 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.

² 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 Order³ 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**”).

³ 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 Schedules⁴ (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**”).⁵ 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,⁶ March 29, 2026 (*i.e.*, the date that is ninety (90) days after the occurrence of the Effective Date).⁷

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.

⁴ 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.

⁵ 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.”).

⁶ *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.”).

⁷ 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' Fourth 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 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

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

catherinerankin@hunton.com

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

keith.simon@lw.com

george.klidonas@lw.com

jon.weichselbaum@lw.com

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**

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

**AFFIDAVIT OF KENNETH SHEPARD
IN SUPPORT OF REORGANIZED DEBTORS’
FOURTH 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’ Fourth Omnibus Objection to Certain Claims* (the “*Objection*”)² 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

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 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. ¹	:	(Jointly Administered)
	:	
	x	

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

Upon the objection (the “*Objection*”)² 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

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 1100, Denver, Colorado 80237.

² 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

UNITED STATES BANKRUPTCY JUDGE

SCHEDULE 1

Late Filed Claims 101 - 200						
#	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
101	Davis, Betty	ModivCare Inc.	2039	11/3/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
102	Devenport, Gwen	ModivCare Inc.	1710	10/2/2025	General Unsecured Priority Secured Admin Priority Total	500 - - - \$ 500
103	Diaz, Ivette	ModivCare Inc.	1881	10/10/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
104	Dickens, Marlon	ModivCare Inc.	2217	12/23/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
105	Dickens, Nasir	ModivCare Inc.	2265	1/14/2026	General Unsecured Priority Secured Admin Priority Total	2,454 - - - \$ 2,454
106	Dingle, Gabrielle	ModivCare Solutions, LLC	1872	10/11/2025	General Unsecured Priority Secured Admin Priority Total	1,000 - - - \$ 1,000
107	Dodge, Melissa	ModivCare Inc.	2148	11/29/2025	General Unsecured Priority Secured Admin Priority Total	200 - - - \$ 200
108	Donaldson, Mark P	ModivCare Inc.	2246	1/12/2026	General Unsecured Priority Secured Admin Priority Total	100 - - - \$ 100
109	Dorado, Maria	ModivCare Inc.	1815	10/7/2025	General Unsecured Priority Secured Admin Priority Total	- - - 300 \$ 300
110	Dowling, Kelly	ModivCare Inc.	2136	11/25/2025	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
111	Downs, Rachel A	ModivCare Inc.	2281	1/20/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
112	Drago, Mary	ModivCare Inc.	2219	12/18/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
113	Dubois, Brenda	ModivCare Inc.	2266	1/15/2026	General Unsecured Priority Secured Admin Priority Total	- 250 - - \$ 250
114	Duran, Marybeth (as Personal Representative of the Wrongful Death Estate of Richard Chavez)	ModivCare Solutions, LLC	2140	11/25/2025	General Unsecured Priority Secured Admin Priority Total	5,000,000 - - - \$ 5,000,000
115	E AND K TN LLC	ModivCare Inc.	2297	1/25/2026	General Unsecured Priority Secured Admin Priority Total	6,781 - - - \$ 6,781
116	Edwards, Tahirah H	ModivCare Inc.	1779	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
117	Ellis, Tiffany M	ModivCare Solutions, LLC	1711	10/2/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
118	Estate of Charles Edward Whaley	ModivCare Inc.	2243	1/12/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
119	Estate of Janet Williams	ModivCare Inc.	2185	12/17/2025	General Unsecured Priority Secured Admin Priority Total	250,000 - - - \$ 250,000
120	EVANS TRANS LLC	ModivCare Inc.	1984	10/22/2025	General Unsecured Priority Secured Admin Priority Total	15,000 - - - \$ 15,000

#	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
121	Exell Water and Coffee, Inc.	ModivCare Inc.	1745	10/3/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
122	Ezman, Deneen	ModivCare Solutions, LLC	1962	10/20/2025	General Unsecured Priority Secured Admin Priority Total	252 - - - \$ 252
123	Fanfan, Marie Ange	ModivCare Inc.	1778	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
124	First Citizens Bank & Trust	Panhandle Support Services, Inc.	1928	10/15/2025	General Unsecured Priority Secured Admin Priority Total	3,088 - - - \$ 3,088
125	First Citizens Bank & Trust	Panhandle Support Services, Inc.	1925	10/15/2025	General Unsecured Priority Secured Admin Priority Total	2,892 - - - \$ 2,892
126	First Citizens Bank & Trust	Panhandle Support Services, Inc.	1927	10/15/2025	General Unsecured Priority Secured Admin Priority Total	2,610 - - - \$ 2,610
127	First-Citizens Bank & Trust Company	ModivCare Inc.	2202	12/16/2025	General Unsecured Priority Secured Admin Priority Total	25,194 - - - \$ 25,194
128	First-Citizens Bank & Trust Company	ModivCare Inc.	2203	12/16/2025	General Unsecured Priority Secured Admin Priority Total	51,595 - - - \$ 51,595
129	First-Citizens Bank & Trust Company	ModivCare Inc.	2204	12/16/2025	General Unsecured Priority Secured Admin Priority Total	4,805 - - - \$ 4,805
130	First-Citizens Bank & Trust Company	ModivCare Inc.	2205	12/16/2025	General Unsecured Priority Secured Admin Priority Total	3,499 - - - \$ 3,499

#	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
131	First-Citizens Bank & Trust Company	ModivCare Inc.	2206	12/16/2025	General Unsecured Priority Secured Admin Priority Total	43,383 - - - \$ 43,383
132	First-Citizens Bank & Trust Company	ModivCare Inc.	2207	12/16/2025	General Unsecured Priority Secured Admin Priority Total	4,313 - - - \$ 4,313
133	First-Citizens Bank & Trust Company	ModivCare Inc.	2208	12/16/2025	General Unsecured Priority Secured Admin Priority Total	7,575 - - - \$ 7,575
134	Fisher and Phillips LLP	ModivCare Inc.	2030	10/31/2025	General Unsecured Priority Secured Admin Priority Total	4,128 - - - \$ 4,128
135	FIVE9 Inc	Valued Relationships, Inc.	1868	10/10/2025	General Unsecured Priority Secured Admin Priority Total	- - - 11,890 \$ 11,890
136	Florez, Sandra	ModivCare Inc.	2107	11/18/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
137	Forbes-Proffit, Amber	ModivCare Solutions, LLC	2028	10/30/2025	General Unsecured Priority Secured Admin Priority Total	- 875 - - \$ 875
138	Fragomen, Del Rey, Bernsen and Loewy, LLP	ModivCare Solutions, LLC	2060	11/7/2025	General Unsecured Priority Secured Admin Priority Total	34,360 - - - \$ 34,360
139	Frangella, Charles	ModivCare Inc.	1777	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- 1,360 - - \$ 1,360
140	Frank, Trevor	ModivCare Inc.	1757	10/4/2025	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
141	Fredriksen, Paul A	ModivCare Solutions, LLC	1975	10/20/2025	General Unsecured Priority Secured Admin Priority Total	- - - 1,109 \$ 1,109
142	Frith, Bonnie	ModivCare Inc.	1713	10/2/2025	General Unsecured Priority Secured Admin Priority Total	200 - - - \$ 200
143	Fuller, Lakesha O	ModivCare Inc.	1737	10/3/2025	General Unsecured Priority Secured Admin Priority Total	- - 4,500 - \$ 4,500
144	Garcia Pena, Victor	ModivCare Inc.	2287	1/20/2026	General Unsecured Priority Secured Admin Priority Total	1,065 - - - \$ 1,065
145	Garcia, Eileen	ModivCare Inc.	2170	12/8/2025	General Unsecured Priority Secured Admin Priority Total	650 20,950 - - \$ 21,600
146	Garcia, Jeannie	ModivCare Inc.	2052	11/5/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
147	Garcia, Mendy	ModivCare Inc.	1768	10/6/2025	General Unsecured Priority Secured Admin Priority Total	11,787 - - - \$ 11,787
148	Gartner, Inc.	ModivCare Solutions, LLC	2231	1/2/2026	General Unsecured Priority Secured Admin Priority Total	135,523 - - - \$ 135,523
149	Gervasi, Diane	ModivCare Inc.	2270	1/16/2026	General Unsecured Priority Secured Admin Priority Total	200,000 - - - \$ 200,000
150	Gibson, Alkeshia	ModivCare Solutions, LLC	1844	10/8/2025	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	
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151	Gilliam, Doris	ModivCare Inc.	1864	10/9/2025	General Unsecured Priority Secured Admin Priority Total	- - - 25,000 \$ 25,000
152	Global Transportation Inc	ModivCare Inc.	1811	10/7/2025	General Unsecured Priority Secured Admin Priority Total	56,000 - - - \$ 56,000
153	Glover Shell, Marshea Denise	ModivCare Inc.	1825	10/7/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
154	Goforth, Erin	ModivCare Inc.	2051	11/4/2025	General Unsecured Priority Secured Admin Priority Total	225 - - - \$ 225
155	Gomez, Edelimira	ModivCare Inc.	1755	10/4/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
156	Goschke, Sonya	ModivCare Solutions, LLC	1803	10/7/2025	General Unsecured Priority Secured Admin Priority Total	46 - - - \$ 46
157	Grant, David	ModivCare Inc.	1695	10/2/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
158	Grant, Shelby J	ModivCare Inc.	1712	10/2/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
159	Gravely, Brenda	ModivCare Solutions, LLC	1822	10/7/2025	General Unsecured Priority Secured Admin Priority Total	- 3,356 - - \$ 3,356
160	Gray, Eric S	ModivCare Inc.	2120	11/21/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -

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161	Gray, Evelyn	ModivCare Inc.	1732	10/3/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
162	Great Blue Research, Inc.	ModivCare Solutions, LLC	1704	10/2/2025	General Unsecured Priority Secured Admin Priority Total	7,097 - - - \$ 7,097
163	Greene, Thomas	ModivCare Inc.	1792	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
164	Guardian Flight LLC	ModivCare Inc.	2421	2/5/2026	General Unsecured Priority Secured Admin Priority Total	6,317 - - - \$ 6,317
165	Gunn, James	ModivCare Inc.	1738	10/3/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
166	Hale, Stephanie	ModivCare Solutions, LLC	1976	10/20/2025	General Unsecured Priority Secured Admin Priority Total	12,097 - - - \$ 12,097
167	Hamilton, Chinnema	ModivCare Inc.	1895	10/14/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
168	Hanchey III, Elwood L	ModivCare Inc.	1869	10/10/2025	General Unsecured Priority Secured Admin Priority Total	- 4,080 - - \$ 4,080
169	Haney, Tywanda	ModivCare Inc.	1936	10/16/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
170	Hargrave, Vivian	ModivCare Inc.	1694	10/2/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -

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171	Harlan, Eric M	ModivCare Inc.	1786	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- 1,275 - - \$ 1,275
172	Harris, Jason	ModivCare Inc.	1702	10/2/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
173	Harris, Jason Sr	ModivCare Inc.	1705	10/2/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
174	Harrison, Selina	CareGivers America Home Health Services, LLC	2223	12/28/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
175	Hart, Amy	ModivCare Solutions, LLC	2088	11/13/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
176	Hawkins, Lindsay	ModivCare Inc.	2282	1/20/2026	General Unsecured Priority Secured Admin Priority Total	500 - - - \$ 500
177	Hayes, Mary	Guardian Medical Monitoring, LLC	1964	10/20/2025	General Unsecured Priority Secured Admin Priority Total	258 - - - \$ 258
178	Haynes, Tralize K	ModivCare Solutions, LLC	1855	10/8/2025	General Unsecured Priority Secured Admin Priority Total	15,000 - - - \$ 15,000
179	Heatley, Carolyn	ModivCare Inc.	1801	10/6/2025	General Unsecured Priority Secured Admin Priority Total	500 - - - \$ 500
180	Heatley, Ordley	ModivCare Inc.	1802	10/6/2025	General Unsecured Priority Secured Admin Priority Total	500 - - - \$ 500

#	Claimant Name	Debtor against Whom Late Filed Claim was Filed	Late Filed Claim No.	Filing Date of Late Filed Claim	Asserted Claim Amount	
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181	Helms, Oletta	ModivCare Inc.	2105	11/18/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
182	Hernandez, Erendira	ModivCare Inc.	2292	1/22/2026	General Unsecured Priority Secured Admin Priority Total	- 3,000 - 3,000 \$ 6,000
183	Herrera, Cathy	ModivCare Inc.	1929	10/15/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
184	Hexaware Technologies Limited	ModivCare Solutions, LLC	2409	2/4/2026	General Unsecured Priority Secured Admin Priority Total	- - - 150,639 \$ 150,639
185	Hickson, Betty	ModivCare Inc.	2435	2/8/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
186	Holliday, Kelly	ModivCare Inc.	1938	10/15/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
187	Holsapple, Ronnie L	ModivCare Inc.	2320	1/28/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
188	Hounshell, Billy	ModivCare Inc.	1736	10/2/2025	General Unsecured Priority Secured Admin Priority Total	- - - 819 \$ 819
189	House, Betsy	ModivCare Inc.	2124	11/21/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
190	Howard, Kay	ModivCare Inc.	2018	10/28/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -

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					Claim Nature	Claim Amount
191	Howard, Terry	ModivCare Inc.	1782	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
192	Howerton, Priscilla	ModivCare Inc.	1771	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
193	Howerton, Tina	ModivCare Inc.	1773	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
194	Hughes, Mahogany	ModivCare Solutions, LLC	2234	1/5/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
195	Hyppolite, Marie G	ModivCare Inc.	2083	11/12/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
196	International Life Support, Inc.	ModivCare Inc.	2388	2/4/2026	General Unsecured Priority Secured Admin Priority Total	44,559 - - - \$ 44,559
197	Isom, Freda	ModivCare Inc.	1978	10/21/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
198	Isom, Harold L	ModivCare Inc.	1980	10/21/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
199	J. L HARRIS TRANSPORTATION	ModivCare Solutions, LLC	1959	10/17/2025	General Unsecured Priority Secured Admin Priority Total	- 2,950 - - \$ 2,950
200	Jackson, Katrina	ModivCare Inc.	2300	1/26/2026	General Unsecured Priority Secured Admin Priority Total	80 - - - \$ 80