

**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' SIXTH
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' Sixth 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

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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**

	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’
SIXTH 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’ Sixth 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’
SIXTH 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 301 - 400						
#	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
301	Mukai, Brenda A	ModivCare Inc.	2306	1/26/2026	General Unsecured Priority Secured Admin Priority Total	- 95 - - \$ 95
302	Mundell, Dolly M	ModivCare Inc.	2143	11/26/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
303	Musseman, Jacquelyn	ModivCare Inc.	2024	10/30/2025	General Unsecured Priority Secured Admin Priority Total	- 1,395 - - \$ 1,395
304	Naha Mendoza, Melody	ModivCare Solutions, LLC	1860	10/8/2025	General Unsecured Priority Secured Admin Priority Total	1,200 - - - \$ 1,200
305	Naranjo, Angel	ModivCare Inc.	2229	12/30/2025	General Unsecured Priority Secured Admin Priority Total	50 - - - \$ 50
306	Nealis, Dottie	ModivCare Inc.	1821	10/7/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
307	Nealis, William Edward	ModivCare Inc.	1780	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
308	Negron Laracuente, Carlos	Victory Health Holdings, LLC	1762	10/5/2025	General Unsecured Priority Secured Admin Priority Total	- - - 25,000 \$ 25,000
309	Neiswender, Barbara E	ModivCare Inc.	2002	10/27/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
310	Nelson, Donnell	ModivCare Inc.	2179	12/12/2025	General Unsecured Priority Secured Admin Priority Total	6,000 10,000 - - \$ 16,000

#	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
311	NEMT Insurance DE LLC, Series 1	ModivCare Solutions, LLC	2373	2/2/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
312	NEMT Insurance, DE LLC	ModivCare Solutions, LLC	2375	2/2/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
313	NEMT Insurance, LLC	ModivCare Solutions, LLC	2376	2/2/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
314	Nichols, David	ModivCare Inc.	1935	10/15/2025	General Unsecured Priority Secured Admin Priority Total	- - - 114 \$ 114
315	Nichols, Jeffquez Lyntwun	ModivCare Inc.	2400	2/4/2026	General Unsecured Priority Secured Admin Priority Total	500 - - - \$ 500
316	Nichols, Shatina	ModivCare Inc.	2394	2/4/2026	General Unsecured Priority Secured Admin Priority Total	500 - - - \$ 500
317	Nocktonick, Beverly	ModivCare Inc.	1787	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
318	Noga, Michael Anthony	ModivCare Inc.	1707	10/2/2025	General Unsecured Priority Secured Admin Priority Total	- - - 100,000,000 \$ 100,000,000
319	Octopus Deploy Pty. Ltd.	ModivCare Solutions, LLC	1997	10/24/2025	General Unsecured Priority Secured Admin Priority Total	3,600 - - - \$ 3,600
320	Ogunyemi, Oladipupo	ModivCare Inc.	1970	10/20/2025	General Unsecured Priority Secured Admin Priority Total	2,018 - - - \$ 2,018

#	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
321	Ogunyemi, Oladipupo	ModivCare Inc.	2253	1/12/2026	General Unsecured Priority Secured Admin Priority Total	2,018 - - - \$ 2,018
322	Ordaz, Carmen	ModivCare Inc.	2000	10/25/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
323	Orzoria, Kelly	ModivCare Inc.	1791	10/4/2025	General Unsecured Priority Secured Admin Priority Total	525 - - - \$ 525
324	Osbourne, Kelsea	ModivCare Solutions, LLC	2164	12/4/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
325	Outland, Dianne	ModivCare Inc.	2318	1/28/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
326	Pacific East Research Inc	ModivCare Inc.	1891	10/13/2025	General Unsecured Priority Secured Admin Priority Total	- - - 5,183 \$ 5,183
327	Patel, Kamlesh	ModivCare Inc.	2308	1/27/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
328	Patel, Meher	Provado Technologies, LLC	2003	10/25/2025	General Unsecured Priority Secured Admin Priority Total	35,000 - - - \$ 35,000
329	Patterson, David	ModivCare Inc.	2335	1/30/2026	General Unsecured Priority Secured Admin Priority Total	700 13,850 - 3,400 \$ 17,950
330	Patterson, David Troy	ModivCare Inc.	2333	1/30/2026	General Unsecured Priority Secured Admin Priority Total	- 18,850 - - \$ 18,850

#	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
331	Patton, Torrey	ModivCare Inc.	1841	10/8/2025	General Unsecured Priority Secured Admin Priority Total	- - - 500 \$ 500
332	Peak, Ericka	ModivCare Solutions, LLC	1977	10/21/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
333	Pearson, Kenneth	ModivCare Inc.	1907	10/14/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
334	Pell, Carla	ModivCare Inc.	2067	11/10/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
335	Pelletier, Taylor	ModivCare Inc.	1888	10/13/2025	General Unsecured Priority Secured Admin Priority Total	- - - 1,000 \$ 1,000
336	Penelec	Caregivers America, LLC.	1789	10/6/2025	General Unsecured Priority Secured Admin Priority Total	189 - - - \$ 189
337	Perdomo, Nick	ModivCare Inc.	1988	10/23/2025	General Unsecured Priority Secured Admin Priority Total	1,333 - - - \$ 1,333
338	Perry, Hannah	ModivCare Solutions, LLC	1753	10/3/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
339	Person, Jamell	ModivCare Solutions, LLC	2324	1/29/2026	General Unsecured Priority Secured Admin Priority Total	- 4,451 - - \$ 4,451
340	Petit	ModivCare Inc.	2240	1/12/2026	General Unsecured Priority Secured Admin Priority Total	679 - - - \$ 679

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341	Phillips, April	ModivCare Inc.	1783	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
342	Pilgrim, Ronald	ModivCare Inc.	1917	10/15/2025	General Unsecured Priority Secured Admin Priority Total	232 - - - \$ 232
343	Pinzon, Jimmy	ModivCare Inc.	1754	10/3/2025	General Unsecured Priority Secured Admin Priority Total	200 - - - \$ 200
344	Pitney Bowes Global Financial Services LLC	ModivCare Inc.	2279	1/20/2026	General Unsecured Priority Secured Admin Priority Total	59,847 - - - \$ 59,847
345	Pizzitola, Rebecca	ModivCare Inc.	2290	1/22/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
346	PK TRANSPORTATION LLC	ModivCare Solutions, LLC	2114	11/21/2025	General Unsecured Priority Secured Admin Priority Total	- - - 12,000 \$ 12,000
347	Plesko, Jenna	ModivCare Inc.	2429	2/5/2026	General Unsecured Priority Secured Admin Priority Total	218 - - - \$ 218
348	Podwils, Eilene	ModivCare Inc.	2239	1/6/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
349	Pollard, Keesha	All Metro Home Care Services of New York, Inc.	2153	12/2/2025	General Unsecured Priority Secured Admin Priority Total	- 12,000 - - \$ 12,000
350	Porter, Ian	ModivCare Inc.	1760	10/5/2025	General Unsecured Priority Secured Admin Priority Total	- - - 6,895 \$ 6,895

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351	Pratt, Hollie	ModivCare Solutions, LLC	2358	2/4/2026	General Unsecured Priority Secured Admin Priority Total	- 13,500 - - \$ 13,500
352	Pressley, Michele	ModivCare Inc.	1748	10/3/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
353	Price, Ramona	ModivCare Solutions, LLC	1770	10/6/2025	General Unsecured Priority Secured Admin Priority Total	500 - - - \$ 500
354	Prisma Health Ambulance Service	ModivCare Inc.	2383	2/3/2026	General Unsecured Priority Secured Admin Priority Total	6,648 - - - \$ 6,648
355	PROFESSIONAL MEDICAL TRANSPORTATION CORP	ModivCare Inc.	1961	10/19/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
356	Pulumi Corporation	ModivCare Solutions, LLC	1963	10/20/2025	General Unsecured Priority Secured Admin Priority Total	306,000 - - - \$ 306,000
357	Quintana, Adam	ModivCare Inc.	1731	10/3/2025	General Unsecured Priority Secured Admin Priority Total	- 2,500 - - \$ 2,500
358	Ramautar, Nicole	All Metro Aids Inc.	2084	11/12/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
359	Ramirez, Rogelio	ModivCare Inc.	1905	10/14/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
360	Ramos, Monica	ModivCare Inc.	2174	12/10/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -

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361	Ramsey, Camilla	ModivCare Inc.	1985	10/22/2025	General Unsecured Priority Secured Admin Priority Total	35,000 - - - \$ 35,000
362	Raper, Linda	Metropolitan Medical Transportation IPA, LLC	2065	11/10/2025	General Unsecured Priority Secured Admin Priority Total	- - 194 - \$ 194
363	Rawlins, Maya	ModivCare Inc.	2309	1/27/2026	General Unsecured Priority Secured Admin Priority Total	500 - - - \$ 500
364	REACH Air Medical Services LLC	ModivCare Inc.	2423	2/5/2026	General Unsecured Priority Secured Admin Priority Total	331,428 - - - \$ 331,428
365	Reed, Sequaia Marie	ModivCare Solutions, LLC	2209	12/21/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
366	Reeder, Pamela	ModivCare Inc.	2186	12/17/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
367	Rehrig, Jennifer	ModivCare Inc.	1818	10/7/2025	General Unsecured Priority Secured Admin Priority Total	1,500 - - - \$ 1,500
368	Rehrig, Nikki	CareGivers America Home Health Services, LLC	1817	10/7/2025	General Unsecured Priority Secured Admin Priority Total	1,200 - - - \$ 1,200
369	Reinsburrow, Danelle	Caregivers America, LLC.	2007	10/26/2025	General Unsecured Priority Secured Admin Priority Total	- 3,500 - - \$ 3,500
370	Reinsburrow, Joshua	ModivCare Inc.	2005	10/26/2025	General Unsecured Priority Secured Admin Priority Total	- 3,500 - - \$ 3,500

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371	Renaud, Michelle	ModivCare Inc.	2242	1/10/2026	General Unsecured Priority Secured Admin Priority Total	- - 1,234 - \$ 1,234
372	RESEARCH DATA GROUP INC	ModivCare Solutions, LLC	2116	11/21/2025	General Unsecured Priority Secured Admin Priority Total	11,373 - - - \$ 11,373
373	Rhymer, Helena	ModivCare Inc.	2171	12/9/2025	General Unsecured Priority Secured Admin Priority Total	- - - 2,000 \$ 2,000
374	Rice, Phyllis	ModivCare Inc.	2100	11/14/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
375	Richard, Robert	ModivCare Inc.	2256	1/13/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
376	Rivers, Mindy	ModivCare Inc.	1919	10/15/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
377	Roberson, Turnell R	ModivCare Inc.	1884	10/10/2025	General Unsecured Priority Secured Admin Priority Total	- - 824 - \$ 824
378	Robertson, Georgina	All Metro Field Service Workers Payroll Services Corporation	2064	11/7/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
379	Robinson, Lorene	VRI Intermediate Holdings, LLC	1852	10/8/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
380	Rodgers, Rosie	ModivCare Inc.	2184	12/15/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -

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381	Rollyson, Barry	ModivCare Solutions, LLC	1950	10/15/2025	General Unsecured Priority Secured Admin Priority Total	- - - 65 \$ 65
382	Roman, Jasmine	ModivCare Inc.	2178	12/13/2025	General Unsecured Priority Secured Admin Priority Total	800 - - - \$ 800
383	Rowe, Jennifer	ModivCare Inc.	2249	1/13/2026	General Unsecured Priority Secured Admin Priority Total	2,000 - - - \$ 2,000
384	Roy, Keiffer	ModivCare Inc.	1922	10/15/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
385	Rubin, Lisa	ModivCare Solutions, LLC	1920	10/15/2025	General Unsecured Priority Secured Admin Priority Total	- - - 276 \$ 276
386	Rufenacht, Leslie	ModivCare Inc.	2433	2/5/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
387	Sallaj, Lisa	ModivCare Inc.	2004	10/25/2025	General Unsecured Priority Secured Admin Priority Total	550,000 - - - \$ 550,000
388	Sandrock, Moira	ModivCare Inc.	2288	1/21/2026	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
389	Santiago, Tomasita	ModivCare Solutions, LLC	1901	10/13/2025	General Unsecured Priority Secured Admin Priority Total	- - - 250 \$ 250
390	Sapp, Karen	ModivCare Inc.	1774	10/6/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -

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391	Schemansky, Christy D	ModivCare Inc.	2210	12/22/2025	General Unsecured Priority Secured Admin Priority Total	- 9,700 - - \$ 9,700
392	Scott, Amanda	ModivCare Inc.	1974	10/20/2025	General Unsecured Priority Secured Admin Priority Total	1,000 - - - \$ 1,000
393	Sexton, Serena	ModivCare Inc.	1944	10/17/2025	General Unsecured Priority Secured Admin Priority Total	260 - - - \$ 260
394	SH Transport	ModivCare Solutions, LLC	2420	2/4/2026	General Unsecured Priority Secured Admin Priority Total	- 7,350 - - \$ 7,350
395	Shapiro, Marc L.	ModivCare Inc.	2151	12/1/2025	General Unsecured Priority Secured Admin Priority Total	300,000 - - - \$ 300,000
396	Shaw, Melissa	ModivCare Inc.	1933	10/15/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
397	Shelton, Nesha	ModivCare Inc.	2347	2/2/2026	General Unsecured Priority Secured Admin Priority Total	500 - - - \$ 500
398	Shelton, Sheila	ModivCare Inc.	2038	11/3/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
399	Shires, Alyssa	ModivCare Inc.	1687	10/2/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
400	Shirk, Monica	ModivCare Inc.	1764	10/5/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -