

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' ELEVENTH  
OMNIBUS OBJECTION TO CERTAIN CLAIMS (SATISFIED 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 “*Satisfied Claims*”) to the Proposed Order in their entirety because each of the Satisfied Claims was satisfied through the Cure Amounts (defined below).

### **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 Satisfied 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 Satisfied 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*, (i) 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**”), and (ii) February 16, 2026, at 5:00 p.m. (prevailing Central Time) as the deadline for all governmental units (as defined in section

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

101(27) of the Bankruptcy Code) to assert a claim (as defined in section 101(5) of the Bankruptcy Code) that arose on or prior to the Petition Date (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**”).

9. 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).

10. 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**”), served 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, and, as necessary, supplemented such service. *See* Bar Date Affidavits of Service.<sup>4</sup> 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*

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<sup>4</sup> “**Bar Date Affidavits of Service**” means, collectively, (i) *Certificate of Service* [Docket No. 113]; (ii) *Certificate of Service* [Docket No. 353]; (iii) *Supplemental Certificate of Service* [Docket No. 400]; (iv) *Supplemental Certificate of Service* [Docket No. 442]; (v) *Supplemental Certificate of Service* [Docket No. 492]; (vi) *Supplemental Certificate of Service* [Docket No. 602]; (vii) *Supplemental Certificate of Service* [Docket No. 603]; (viii) *Supplemental Certificate of Service* [Docket No. 700]; (ix) *Supplemental Certificate of Service* [Docket No. 727]; (x) *Supplemental Certificate of Service* [Docket No. 1067]; (xi) *Supplemental Certificate of Service* [Docket No. 1127]; (xii) *Supplemental Certificate of Service* [Docket No. 1143]; (xiii) *Supplemental Certificate of Service* [Docket No. 1148]; (xiv) *Supplemental Certificate of Service* [Docket No. 1184]; (xv) *Supplemental Certificate of Service* [Docket No. 1285]; and (xvi) *Supplemental Certificate of Service* [Docket No. 1320].

*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].

11. The Reorganized Debtors also listed numerous claims in their Schedules<sup>5</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>6</sup>

12. 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>7</sup> March 29, 2026 (*i.e.*, the date that is ninety (90) days after the occurrence of the Effective Date).<sup>8</sup> On March 9, 2026, the Reorganized Debtors filed the *Reorganized Debtors’ Motion for Entry of an Order Extending the Time to File and Serve Objections to Claims* [Docket No. 1363] (the “**Claim Objection Deadline Extension Motion**”) seeking an extension of the Claims Objection Deadline for an additional ninety (90) days through and including June 29, 2026, which, pursuant to the Complex Case Procedures, automatically extended the Claims Objection Deadline until the Court rules on the Claims Objection Deadline Extension Motion.<sup>9</sup>

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<sup>5</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>6</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>7</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>8</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.

<sup>9</sup> *See* Complex Case Procedures, ¶ 30 (providing that “if a motion is filed that complies with these procedures to extend the time to take any action before the expiration of the period prescribed by the Bankruptcy Code, the

13. Pursuant to the Solicitation Procedures Order,<sup>10</sup> on October 30, 2025, the Reorganized Debtors filed the *Notice of Potential Assumption of Certain of Debtors' Executory Contracts and Unexpired Leases* (the "**Assumption Notice**") [Docket No. 605]. Schedule 1 to the Assumption Notice identified certain leases and contracts that could be assumed (the "**Designated Contracts**"). The Assumption Notice set forth amounts owing to cure any monetary default under the Designated Contracts (the "**Cure Amounts**"). The deadline to object to the Cure Amounts (an "**Assumption Objection**") occurred on November 17, 2025 (the "**Assumption Objection Deadline**").

14. 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 Satisfied Claims along with this Objection.

### **THE SATISFIED CLAIMS**

15. The Reorganized Debtors' review of the Claims Register allowed them to identify the Satisfied Claims. This Objection seeks to disallow the Satisfied Claims in their entirety because

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Bankruptcy Rules, the Local Bankruptcy Rules, or a confirmed plan, the time for taking the action is automatically extended until the Court rules on the motion.").

<sup>10</sup> On October 17, 2025, the Court entered the *Amended Order (A) Approving Disclosure Statement; (B) Scheduling Confirmation Hearing; (C) Establishing Related Objection and Voting Deadlines; (D) Approving Related Solicitation Procedures, Ballots, and Release Opt-Out Forms and Form and Manner of Notice; (E) Approving Procedures for Assumption of Executory Contracts and Unexpired Leases; (F) Approving Equity Rights Offering Procedures and Related Materials; and (G) Granting Related Relief* [Docket No. 552] (the "**Solicitation Procedures Order**").

each Satisfied Claim is based on a Designated Contract that was satisfied through the Cure Amount associated with the underlying Designated Contract.

16. As attested to in the *Affidavit of Kenneth Shepard in Support of Debtors' Eleventh 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 Satisfied Claim on **Schedule 1** to the Proposed Order as being satisfied by the Cure Amount for the applicable Designated Contract that forms the basis of the applicable Satisfied Claim. To identify the Satisfied Claims, the Reorganized Debtors:

- (a) reviewed the Claims Register to identify instances in which a Claim was based on a Designated Contract;
- (b) determined that each Satisfied Claim is based on amounts addressed by the Assumption Notice and satisfied by the Cure Amounts; and
- (c) determined that no Assumption Objections related to the Satisfied Claims were filed by the Assumption Objection Deadline and remain unresolved.

17. The Reorganized Debtors hereby request that the Satisfied Claims be disallowed in their entirety and expunged.

#### **BASIS FOR RELIEF**

18. 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 “have been satisfied or released during the case . . . .” FED. R. BANKR. P. 3007(d)(2)(E).

19. 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)).

20. Here, the Reorganized Debtors filed the Assumption Notice, pursuant to the Solicitation Procedures Order, setting forth the Designated Contracts, related Cure Amounts, and the Assumption Objection Deadline. The Assumption Notice expressly provides that failure to timely object to the Cure Amount results in the Designated Contract being deemed “to have consented to the Cure Amount . . . and shall be forever enjoined and barred from seeking any additional amounts or claims.” Assumption Notice, p. 4. As set forth above, the Satisfied Claims were satisfied by the Cure Amount associated with the applicable Designated Contract, and no timely Assumption Objections related to the Satisfied Claims remain unsolved. Thus, the Satisfied Claims are subject to disallowance.

21. 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**

22. 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 Satisfied Claims or any other Claims on any other grounds that the Reorganized Debtors discover or elect to pursue.

23. 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**

24. 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.

25. 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 31, 2026

Respectfully submitted,

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

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**HUNTON ANDREWS KURTH LLP**

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*Co-Counsel for the Reorganized Debtors*

**CERTIFICATE OF SERVICE**

I certify that on March 31, 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’  
ELEVENTH 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’ Eleventh Omnibus Objection to Certain Claims* (the “*Objection*”)<sup>2</sup> pursuant to Rule 3007-1 of the Bankruptcy Local Rules.

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 my personal knowledge, my review of relevant documents, information provided to me by

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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.

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 SATISFIED 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 Satisfied Claims which they seek the disallowance of in their entirety.

5. The Satisfied Claims were identified after the Reorganized Debtors:

- (a) reviewed the Claims Register to identify instances in which a Claim was based on a Designated Contract;
- (b) determined that each Satisfied Claim is based on amounts addressed by the Assumption Notice and satisfied by the Cure Amounts; and
- (c) determined that no Assumption Objections related to the Satisfied Claims were filed by the Assumption Objection Deadline and remain unresolved.

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 31, 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’  
ELEVENTH 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 Satisfied 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

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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.

deliberation 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 Satisfied 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 Satisfied Claim and the Reorganized Debtors' objections to each Satisfied Claim constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each Satisfied 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**

#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
1	Danville Life Saving and First Aid Crew Inc	ModivCare Inc.	1646	10/1/2025	General Unsecured Priority Secured Admin Priority Total	2,192 - - - \$ 2,192
2	Datavail Corporation	ModivCare Inc.	7	8/22/2025	General Unsecured Priority Secured Admin Priority Total	142,888 - - - \$ 142,888
3	Datavail Corporation	ModivCare Inc.	6	8/22/2025	General Unsecured Priority Secured Admin Priority Total	14,288 - - - \$ 14,288
4	Deerhold Ltd	ModivCare Inc.	670	9/23/2025	General Unsecured Priority Secured Admin Priority Total	154,800 - - - \$ 154,800
5	DESERT VALLEY MEDICAL TRANSPORT INC	ModivCare Inc.	1479	10/1/2025	General Unsecured Priority Secured Admin Priority Total	88,281 - - - \$ 88,281
6	DESOTO COUNCIL ON AGING INC	ModivCare Inc.	886	9/29/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
7	DIGNITY RESPECT TRANSPORTATION LLC	ModivCare Solutions, LLC	896	9/28/2025	General Unsecured Priority Secured Admin Priority Total	- 1,000 - - \$ 1,000
8	EBBETTS PASS FIRE DISTRICT	ModivCare Inc.	1430	10/1/2025	General Unsecured Priority Secured Admin Priority Total	8,909 - - - \$ 8,909
9	EXCEL MEDICAL TRANSPORTATION LLC	ModivCare Inc.	993	9/30/2025	General Unsecured Priority Secured Admin Priority Total	146,916 - - - \$ 146,916
10	Falcon Critical Care Transport, LLC	ModivCare Inc.	781	9/25/2025	General Unsecured Priority Secured Admin Priority Total	29,283 - - - \$ 29,283

#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
11	Federal Insurance Company on its Own Behalf and on Behalf of all Federal Companies	ModivCare Inc.	934	9/29/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
12	FIRSTMED AMBULANCE SERVICES, INC.	ModivCare Inc.	987	9/29/2025	General Unsecured Priority Secured Admin Priority Total	196,761 - - - \$ 196,761
13	For Senior Help, LLC	ModivCare Inc.	83	9/8/2025	General Unsecured Priority Secured Admin Priority Total	56,198 - - - \$ 56,198
14	FORESTHILL FIRE DEPARTMENT	ModivCare Inc.	1071	9/30/2025	General Unsecured Priority Secured Admin Priority Total	6,000 - - - \$ 6,000
15	Friedlander Group inc	ModivCare Inc.	1145	9/30/2025	General Unsecured Priority Secured Admin Priority Total	25,000 - - - \$ 25,000
16	FUTURES UNLIMITED INC	ModivCare Solutions, LLC	127	9/10/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
17	GARDEN COUNTY PUBLIC TRANSPORTATION	ModivCare Inc.	462	9/18/2025	General Unsecured Priority Secured Admin Priority Total	367 - - - \$ 367
18	GATOR FREIGHTER SERVICES, LLC	ModivCare Inc.	1056	9/29/2025	General Unsecured Priority Secured Admin Priority Total	16,914 - - - \$ 16,914
19	GeBBS Healthcare Solutions Inc	ModivCare Inc.	1581	10/1/2025	General Unsecured Priority Secured Admin Priority Total	32,886 - - - \$ 32,886
20	Genesys Cloud Services Inc.	ModivCare Solutions, LLC	1601	10/1/2025	General Unsecured Priority Secured Admin Priority Total	1,405,621 - - - \$ 1,405,621

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21	GJLT MANAGEMENT LLC	Care Finders Total Care LLC	537	9/22/2025	General Unsecured Priority Secured Admin Priority Total	10,557 - - - \$ 10,557
22	Gold Coast Ambulance Service	ModivCare Inc.	1492	10/1/2025	General Unsecured Priority Secured Admin Priority Total	84,038 - - - \$ 84,038
23	Granville EMS	ModivCare Inc.	1548	10/1/2025	General Unsecured Priority Secured Admin Priority Total	3,159 - - - \$ 3,159
24	HALL AMBULANCE SERVICE INC	ModivCare Solutions, LLC	460	9/18/2025	General Unsecured Priority Secured Admin Priority Total	34,949 - - - \$ 34,949
25	HART TO HEART AMBULANCE SERVICE, INC.	ModivCare Inc.	1152	9/30/2025	General Unsecured Priority Secured Admin Priority Total	4,738 - - - \$ 4,738
26	Heartland Ambulance Service LLC	ModivCare Inc.	33	8/27/2025	General Unsecured Priority Secured Admin Priority Total	11,586 - - - \$ 11,586
27	Hemet Valley Ambulance Service, Inc.	ModivCare Inc.	1488	10/1/2025	General Unsecured Priority Secured Admin Priority Total	22,910 - - - \$ 22,910
28	Herren Enterprises, Inc.	ModivCare Inc.	1506	10/1/2025	General Unsecured Priority Secured Admin Priority Total	3,035 - - - \$ 3,035
29	Hidalgo County	ModivCare Inc.	618	9/22/2025	General Unsecured Priority Secured Admin Priority Total	- - 98 - \$ 98
30	Huron Group, Inc.	All Metro Aids Inc.	491	9/19/2025	General Unsecured Priority Secured Admin Priority Total	5,670 - - - \$ 5,670

#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Asserted Claim Amount	
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31	Imperial Ambulance Inc.	ModivCare Solutions, LLC	532	9/22/2025	General Unsecured Priority Secured Admin Priority Total	72,085 - - - \$ 72,085
32	Imperial Ambulance Inc.	ModivCare Solutions, LLC	1153	9/30/2025	General Unsecured Priority Secured Admin Priority Total	62,611 - - - \$ 62,611
33	Imperial Ambulance Inc.	ModivCare Solutions, LLC	1154	9/30/2025	General Unsecured Priority Secured Admin Priority Total	9,474 - - - \$ 9,474
34	International Life Support, Inc.	ModivCare Inc.	1505	10/1/2025	General Unsecured Priority Secured Admin Priority Total	296,298 - - - \$ 296,298
35	Iredell County EMS	ModivCare Inc.	1366	10/1/2025	General Unsecured Priority Secured Admin Priority Total	42,364 - - - \$ 42,364
36	ISERVED TRANSPORTATION	ModivCare Solutions, LLC	945	9/26/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
37	JACKSON COUNTY FIRE RESCUE	ModivCare Inc.	1120	9/30/2025	General Unsecured Priority Secured Admin Priority Total	17,787 - - - \$ 17,787
38	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1176	9/30/2025	General Unsecured Priority Secured Admin Priority Total	3,751 - - - \$ 3,751
39	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1182	9/30/2025	General Unsecured Priority Secured Admin Priority Total	3,193 - - - \$ 3,193
40	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1199	9/30/2025	General Unsecured Priority Secured Admin Priority Total	3,045 - - - \$ 3,045

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41	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1169	9/30/2025	General Unsecured Priority Secured Admin Priority Total	2,975 - - - \$ 2,975
42	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1209	9/30/2025	General Unsecured Priority Secured Admin Priority Total	2,970 - - - \$ 2,970
43	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1211	9/30/2025	General Unsecured Priority Secured Admin Priority Total	2,933 - - - \$ 2,933
44	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1212	9/30/2025	General Unsecured Priority Secured Admin Priority Total	2,745 - - - \$ 2,745
45	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1205	9/30/2025	General Unsecured Priority Secured Admin Priority Total	2,603 - - - \$ 2,603
46	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1203	9/30/2025	General Unsecured Priority Secured Admin Priority Total	2,435 - - - \$ 2,435
47	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1200	9/30/2025	General Unsecured Priority Secured Admin Priority Total	2,397 - - - \$ 2,397
48	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1163	9/30/2025	General Unsecured Priority Secured Admin Priority Total	2,350 - - - \$ 2,350
49	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1181	9/30/2025	General Unsecured Priority Secured Admin Priority Total	2,332 - - - \$ 2,332
50	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1165	9/30/2025	General Unsecured Priority Secured Admin Priority Total	2,215 - - - \$ 2,215

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51	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1166	9/30/2025	General Unsecured Priority Secured Admin Priority Total	2,198 - - - \$ 2,198
52	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1161	9/30/2025	General Unsecured Priority Secured Admin Priority Total	2,189 - - - \$ 2,189
53	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1198	9/30/2025	General Unsecured Priority Secured Admin Priority Total	2,152 - - - \$ 2,152
54	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1228	9/30/2025	General Unsecured Priority Secured Admin Priority Total	2,128 - - - \$ 2,128
55	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1115	9/30/2025	General Unsecured Priority Secured Admin Priority Total	2,124 - - - \$ 2,124
56	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1167	9/30/2025	General Unsecured Priority Secured Admin Priority Total	1,643 - - - \$ 1,643
57	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1210	9/30/2025	General Unsecured Priority Secured Admin Priority Total	1,453 - - - \$ 1,453
58	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1226	9/30/2025	General Unsecured Priority Secured Admin Priority Total	1,445 - - - \$ 1,445
59	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1224	9/30/2025	General Unsecured Priority Secured Admin Priority Total	1,443 - - - \$ 1,443
60	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1160	9/30/2025	General Unsecured Priority Secured Admin Priority Total	1,157 - - - \$ 1,157

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61	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1207	9/30/2025	General Unsecured Priority Secured Admin Priority Total	1,148 - - - \$ 1,148
62	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1215	9/30/2025	General Unsecured Priority Secured Admin Priority Total	1,078 - - - \$ 1,078
63	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1180	9/30/2025	General Unsecured Priority Secured Admin Priority Total	1,045 - - - \$ 1,045
64	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1175	9/30/2025	General Unsecured Priority Secured Admin Priority Total	997 - - - \$ 997
65	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1172	9/30/2025	General Unsecured Priority Secured Admin Priority Total	995 - - - \$ 995
66	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1185	9/30/2025	General Unsecured Priority Secured Admin Priority Total	687 - - - \$ 687
67	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1196	9/30/2025	General Unsecured Priority Secured Admin Priority Total	670 - - - \$ 670
68	Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	1193	9/30/2025	General Unsecured Priority Secured Admin Priority Total	664 - - - \$ 664
69	JMJ Solutions Inc.	ModivCare Inc.	434	9/18/2025	General Unsecured Priority Secured Admin Priority Total	13,000 - - - \$ 13,000
70	Keystone Quality Transport	ModivCare Solutions, LLC	16	8/27/2025	General Unsecured Priority Secured Admin Priority Total	59,420 - - - \$ 59,420

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71	KIWI EMERGENCY MEDICAL SERVICES	ModivCare Inc.	1490	10/1/2025	General Unsecured Priority Secured Admin Priority Total	27,952 - - - \$ 27,952
72	LASALLE GENERAL HOSPITAL AMBULANCE SVC	ModivCare Inc.	1020	9/30/2025	General Unsecured Priority Secured Admin Priority Total	68,285 - - - \$ 68,285
73	LEGERE PROPERTIES LLC	All Metro Home Care Services of New York, Inc.	213	9/15/2025	General Unsecured Priority Secured Admin Priority Total	158,004 - - - \$ 158,004
74	LEONE FREIGHT SERVICES LLC	ModivCare Solutions, LLC	1608	10/1/2025	General Unsecured Priority Secured Admin Priority Total	5,439 - - - \$ 5,439
75	LifeFleet Southeast, Inc.	ModivCare Inc.	1496	10/1/2025	General Unsecured Priority Secured Admin Priority Total	97,745 - - - \$ 97,745
76	Lifeguard Ambulance Service LLC	ModivCare Inc.	1504	10/1/2025	General Unsecured Priority Secured Admin Priority Total	88,708 - - - \$ 88,708
77	LIFEGUARD AMBULANCE SERVICE OF FLORIDA LLC	ModivCare Inc.	1500	10/1/2025	General Unsecured Priority Secured Admin Priority Total	217,367 - - - \$ 217,367
78	Lifestar Response of Maryland, Inc.	ModivCare Solutions, LLC	17	8/27/2025	General Unsecured Priority Secured Admin Priority Total	45,374 - - - \$ 45,374
79	Lifestream Transportation Inc	ModivCare Inc.	150	9/11/2025	General Unsecured Priority Secured Admin Priority Total	227 - - - \$ 227
80	LJL TRUCKING INC DBA MED-VAN TRANSPORT	ModivCare Inc.	87	9/9/2025	General Unsecured Priority Secured Admin Priority Total	1,211 - - - \$ 1,211

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81	Madison County Transportation Authority	ModivCare Inc.	1195	9/30/2025	General Unsecured Priority Secured Admin Priority Total	- 14,503 - - \$ 14,503
82	Madison Medics	ModivCare Inc.	1552	10/1/2025	General Unsecured Priority Secured Admin Priority Total	1,458 - - - \$ 1,458
83	MCCLOUD COMMUNITY SERVICE DISTRICT	ModivCare Inc.	1607	10/1/2025	General Unsecured Priority Secured Admin Priority Total	2,322 - - - \$ 2,322
84	Mecklenburg EMS Agency	ModivCare Inc.	718	9/24/2025	General Unsecured Priority Secured Admin Priority Total	50,380 - - - \$ 50,380
85	Medevac MidAmerica, Inc.	ModivCare Inc.	1508	10/1/2025	General Unsecured Priority Secured Admin Priority Total	21,576 - - - \$ 21,576
86	MEDIC 1 AMBULANCE SERVICE INC	ModivCare Inc.	1652	10/1/2025	General Unsecured Priority Secured Admin Priority Total	- - - 27,175 \$ 27,175
87	Medical Emergency Ambulance Transport Inc	ModivCare Inc.	1391	10/1/2025	General Unsecured Priority Secured Admin Priority Total	35,263 - - - \$ 35,263
88	Medics Ambulance Service, Inc.	ModivCare Inc.	1502	10/1/2025	General Unsecured Priority Secured Admin Priority Total	54,738 - - - \$ 54,738
89	Medstar Ambulance of Mendocino County	ModivCare Inc.	1621	10/1/2025	General Unsecured Priority Secured Admin Priority Total	942 - - - \$ 942
90	Mercury Ambulance Service, Inc.	ModivCare Inc.	1519	10/1/2025	General Unsecured Priority Secured Admin Priority Total	1,266 - - - \$ 1,266

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91	Mercy Ambulance of Evansville, Inc.	ModivCare Inc.	1512	10/1/2025	General Unsecured Priority Secured Admin Priority Total	146,940 - - - \$ 146,940
92	METRO AMBUALNCE SERVICES RURAL INC	ModivCare Inc.	1511	10/1/2025	General Unsecured Priority Secured Admin Priority Total	501,501 - - - \$ 501,501
93	MILESTONE NEMT LLC	ModivCare Inc.	894	9/28/2025	General Unsecured Priority Secured Admin Priority Total	1,805,707 5,293 39,000 - \$ 1,850,000
94	MOBILE MEDIC AMBULANCE SERVICE INC	ModivCare Inc.	1514	10/1/2025	General Unsecured Priority Secured Admin Priority Total	143,862 - - - \$ 143,862
95	MONTEREY COUNTY REGIONAL FPD	ModivCare Inc.	1623	10/1/2025	General Unsecured Priority Secured Admin Priority Total	3,144 - - - \$ 3,144
96	MORAGA ORINDA FIRE DISTRICT	ModivCare Solutions, LLC	1097	9/30/2025	General Unsecured Priority Secured Admin Priority Total	3,295 - - - \$ 3,295
97	MOULTRIE COUNTY COLLECTOR	Healthcom, Inc.	769	9/25/2025	General Unsecured Priority Secured Admin Priority Total	- - 53 - \$ 53
98	NATIONAL MOBILITY ELDERCARE INC	ModivCare Inc.	140	9/10/2025	General Unsecured Priority Secured Admin Priority Total	1,065 - - - \$ 1,065
99	Newport Beach Fire Department Paramedic Service	ModivCare Inc.	1636	10/1/2025	General Unsecured Priority Secured Admin Priority Total	1,497 - - - \$ 1,497
100	NJ Mobile Health Care LLC	ModivCare Inc.	1526	10/1/2025	General Unsecured Priority Secured Admin Priority Total	577,081 - - - \$ 577,081