

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

----- X
In re: : Chapter 11
MODIVCARE INC., *et al.*, : Case No. 25-90309 (ARP)
Reorganized Debtors.¹ : (Jointly Administered)
----- X

CERTIFICATE OF SERVICE

I, Mikayla Cleary, depose and say that I am employed by Kurtzman Carson Consultants, LLC dba Verita Global (“Verita”), the claims and noticing agent for the Reorganized Debtors in the above-captioned case.

On March 31, 2026, at my direction and under my supervision, employees of Verita caused to be served the following documents via Electronic Mail upon the service list attached hereto as **Exhibit A**; and via First Class Mail upon the service list attached hereto as **Exhibit B**:

- **Notice and Reorganized Debtors’ Ninth Omnibus Objection to Certain Claims (Satisfied Claims)** [attached hereto as **Exhibit K**; substantially in the form of Docket No. 1395]
- **Notice and Reorganized Debtors’ Tenth Omnibus Objection to Certain Claims (Satisfied Claims)** [attached hereto as **Exhibit L**; substantially in the form of Docket No. 1396]
- **Notice and Reorganized Debtors’ Eleventh Omnibus Objection to Certain Claims (Satisfied Claims)** [attached hereto as **Exhibit M**; substantially in the form of Docket No. 1397]
- **Notice and Reorganized Debtors’ Twelfth Omnibus Objection to Certain Claims (Satisfied Claims)** [attached hereto as **Exhibit N**; substantially in the form of Docket No. 1398]

¹ A complete list of each of the reorganized debtors (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.



Furthermore, on March 31, 2026, at my direction and under my supervision, employees of Verita caused to be served the following document via Electronic Mail upon the service list attached hereto as **Exhibit C**; and via First Class Mail upon the service list attached hereto as **Exhibit D**:

- **Notice and Reorganized Debtors' Ninth Omnibus Objection to Certain Claims (Satisfied Claims)** [attached hereto as **Exhibit K**; substantially in the form of Docket No. 1395]

Furthermore, on March 31, 2026, at my direction and under my supervision, employees of Verita caused to be served the following document via Electronic Mail upon the service list attached hereto as **Exhibit E**; and via First Class Mail upon the service list attached hereto as **Exhibit F**:

- **Notice and Reorganized Debtors' Tenth Omnibus Objection to Certain Claims (Satisfied Claims)** [attached hereto as **Exhibit L**; substantially in the form of Docket No. 1396]

Furthermore, on March 31, 2026, at my direction and under my supervision, employees of Verita caused to be served the following document via Electronic Mail upon the service list attached hereto as **Exhibit G**; and via First Class Mail upon the service list attached hereto as **Exhibit H**:

- **Notice and Reorganized Debtors' Eleventh Omnibus Objection to Certain Claims (Satisfied Claims)** [attached hereto as **Exhibit M**; substantially in the form of Docket No. 1397]

Furthermore, on March 31, 2026, at my direction and under my supervision, employees of Verita caused to be served the following document via Electronic Mail upon the service list attached hereto as **Exhibit I**; and via First Class Mail upon the service list attached hereto as **Exhibit J**:

- **Notice and Reorganized Debtors' Twelfth Omnibus Objection to Certain Claims (Satisfied Claims)** [attached hereto as **Exhibit N**; substantially in the form of Docket No. 1398]

Dated: April 6, 2026

/s/ Mikayla Cleary
Mikayla Cleary
Verita
222 N Pacific Coast Highway,
3rd Floor
El Segundo, CA 90245
Tel. 310.823.9000

Exhibit A

Exhibit A

Post-Effective Master Service List
Served via Electronic Mail

Description	CreditorName	CreditorNoticeName	Email
Counsel to Collin County Tax Assessor / Collector	Abernathy, Roeder, Boyd & Hullett, P.C.	Paul M. Lopez, Larry R. Boyd, and Emily M. Hahn	plopez@abernathy-law.com; lboyd@abernathy-law.com; ehahn@abernathy-law.com; bankruptcy@abernathy-law.com
IRS	Internal Revenue Service	Centralized Insolvency Operation	Mimi.M.Wong@irs.counsel.treas.gov
IRS	Internal Revenue Service	Centralized Insolvency Operation	Mimi.M.Wong@irs.counsel.treas.gov
Counsel to Florence Speaker	Law Firm of Shawn M. Grady, PLLC	Shawn M. Grady	shawn@gradycollectionlaw.com
Top 30 Creditor	Morris And Company	Drew Kenny	dkenny@thinkllp.com
SEC Regional Office	Securities & Exchange Commission	Fort Worth Regional Office	dfw@sec.gov
SEC Headquarters	Securities & Exchange Commission	Secretary of the Treasury	secbankruptcy@sec.gov
Texas Attorney General	Texas Attorney General	Attn Bankruptcy Department	bankruptcytax@oag.texas.gov; communications@oag.texas.gov
United States Attorney Office for the Southern District of Texas	US Attorney Office, Southern District of Texas		usatxs.atty@usdoj.gov; USATXS.CivilNotice@usdoj.gov
Office of the U.S. Trustee for the Southern District of Texas (Houston Division)	US Trustee for the Southern District of Texas	Jana Smith Whitworth	Jana.Whitworth@usdoj.gov

Exhibit B

Exhibit B

Post-Effective Master Service List
Served via First Class Mail

Description	CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
Counsel to American Express National Bank	Becket & Lee LLP	Christopher Cramer	PO Box 3001		Malvern	PA	19355-0701
IRS	Internal Revenue Service		1919 Smith Street		Houston	TX	77002
Texas Comptroller of Public Accounts	Texas Comptroller of Public Accounts	Attn Bankruptcy Section	Lyndon B Johnson State Office Building	111 East 17th St	Austin	TX	78774
Texas Comptroller of Public Accounts	Texas Comptroller of Public Accounts		PO Box 13528, Capitol Station		Austin	TX	78711-3528
United States Attorney Office for the Southern District of Texas	US Attorney Office, Southern District of Texas	Civil Process Clerk for the U.S. Attorney's Office	1000 Louisiana	Suite 2300	Houston	TX	77002
US Attorney General	US Department of Justice	US Attorney General	950 Pennsylvania Avenue NW		Washington	DC	20530-0001

Exhibit C

**Ninth Omnibus Objection Claimants Service List
Served via Electronic Mail**

CreditorName	CreditorNoticeName	Email
1590 ADAMSON LLC	Attn Kathy Kim	pdiamond@greenlakefund.com; plaza.morrow@gmail.com
400 Southborough, LLC, Successor in Interest to RREEF America REIT III Z4 LLC	Chris Dyer	cdyer@marrgroup.com
ABINGDON AMBULANCE SERVICE		aturner@abingdonambulance.com
AFFORDABLE TRANSPORT INC	RICHARD F JENSEN	rjensen@affordabletransport.net
Alamance County Emergency Medical Service	EMSMC	hipaacompliance@emsmc.com
Alamance County Emergency Medical Service		hipaacompliance@emsmc.com
Albemarle Medical Transport INC	Brent McKecuen	brents25@hotmail.com
ALPHAONE AMBULANCE MEDICAL SERVICES, INC.	ALPHA ONE AMBULANCE MEDICAL SVCS INC	mjones@alphaoneamb.com; tarjil@alphaoneamb.com; shawnkrogh@kroghdecker.com
Ambuserve Inc.	Shana Livesey	swestrick@ambuserve.net
American Ambulance of Visalia	Anna George	ageorge@aavems.com
AMERICAN AMBULANCE OF VISALIA		ageorge@aavems.com
American Ground Transportation	Cazzell Law, APC	cazzell@msn.com
AMERICAN LEGION POST NO. 108 AMBULANCE SERVICE	EMSMC	hipaacompliance@emsmc.com
AMERICAN LEGION POST NO. 108 AMBULANCE SERVICE		amcnany@alpost108.org; hipaacompliance@emsmc.com
American Medical Response Ambulance Service, Inc.	Shaun Notary	Shaun.Notary@gmr.net
American Medical Response Mid-Atlantic Inc		Shaun.Notary@gmr.net
American Medical Response of Inland Empire	Shaun Notary	Shaun.Notary@gmr.net
American Medical Response of Maricopa, LLC	Shaun Notary	shaun.notary@gmr.net
American Medical Response of New York, LLC		shaun.notary@gmr.net
AMERICAN MEDICAL RESPONSE OF SAN DIEGO INC		Shaun.Notary@gmr.net
American Medical Response of Southern California	Shaun Notary	Shaun.Notary@gmr.net
American Medical Response West	Shaun Notary	shaun.notary@gmr.net
American Professional Ambulance	Marina Mishchenko	mmishchenko@apa-ems.com

Exhibit D

Exhibit D

**Ninth Omnibus Objection Claimants Service List
Served via First Class Mail**

CreditorName	CreditorNoticeName	Address1	City	State	Zip
AFFORDABLE TRANSPORT INC	RICHARD F JENSEN	3706 DMG DR	LAKELAND	FL	33811
Affordable Transport Inc	Richard F Jensen	116 14th NE	St Petersburg	FL	33701
Alamance County Emergency Medical Service		PO Box 309	Lewisville	NC	27023

Exhibit E

Tenth Omnibus Objection Claimants Service List
Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
American Professional Ambulance	Marina Mishchenko	mmishchenko@apa-ems.com
AmeriHealth Michigan, Inc.	Robert A. Chu and Albert F. Moran	afmoran@amerihealthcaritas.com; alunkenheimer@amerihealthcaritas.com
AMWEST, INC., DBA AMWEST AMBULANCE		mark@amwestamb.net
Arcata-Mad River Ambulance LLC	Shaun Notary	shaun.notary@gmr.net
Arch Insurance Company	Francine Petrosino, Executive Legal Assistant	fpetrosino@archinsurance.com
Arch Specialty Insurance Company		fpetrosino@archinsurance.com
Ash Rand Rescue EMS	EMSMC	hipaacompliance@emsmc.com
Ash Rand Rescue EMS		hipaacompliance@emsmc.com
AUCTIONIQ LLC		carey@aiq.co
BALENTINE AMBULANCE SERVICE INC		shontelle@balentineambulance.com
BARONA BAND OF MISSION INDIANS		jennifer.bump@emsmc.com
BAY MEDIC TRANSPORTATION INC		verenice.ortiz@baymedic.com
BLACK & WHITE TAXI & CAB CO LLC		twilkenson@bwtransportation.com
Blythe Ambulance Service	Shaun Notary	shaun.notary@gmr.net
Broward Ambulance, Inc.	Shaun Notary	Shaun.Notary@gmr.net
BrowserStack, Inc.		banya@browserstack.com
BT EXPRESS TRANSPORTATION	DARREN BARNO	DBARNO2001@AOL.COM
BURNEY FIRE PROTECTION DISTRICT		jennifer.bump@emsmc.com
Byron Kotzas & Olga Domotor ETAL PT	DBA Route 37 West Associates	KDUPONT@CRNJ.COM
Caldwell County Emergency Medical Service	EMSMC	hipaacompliance@emsmc.com
Caldwell County Emergency Medical Service		hipaacompliance@emsmc.com
Cal-Ore Life Flight LLC	Jody C Tullos	jody.tullos@gmr.net; greg.kelminson@gmr.net
CAL-ORE LIFE FLIGHT LLC		jody.tullos@gmr.net
CALSTAR Air Medical Services LLC	Jody C Tullos	jody.tullos@gmr.net; greg.kelminson@gmr.net
CALSTAR Air Medical Services LLC		jody.tullos@gmr.net
Canon Financial Services, Inc.	Attn Amar A. Agrawal, Esquire	aagrawal@egallawfirm.com
Cape County Private Ambulance Service	Jeffrey Roorda	jroorda@proclaimsbilling.com
Chariton County Ambulance District	Jeffrey Roorda	jroorda@proclaimsbilling.com
Charleston, RDH Charities	Greg Felt	greg@rmhcharleston.org
CITATION INVESTMENTS INC	JOSEPH K MCDONIE	joemcdonie@gmail.com
City Ambulance of Eureka, Inc.	Shaun Notary	shaun.notary@gmr.net
CITY OF ALAMEDA FIRE DEPARTMENT		jennifer.bump@emsmc.com
City of Alhambra Fire Department Paramedics		jennifer.bump@emsmc.com
CITY OF ANAHEIM FIRE AND RESCUE		jennifer.bump@emsmc.com
CITY OF ARCADIA EMERGENCY AMBULANCE		jennifer.bump@emsmc.com
CITY OF AVALON		jennifer.bump@emsmc.com
CITY OF BERKELEY AMBULANCE		jennifer.bump@emsmc.com
CITY OF BREA AMBULANCE BILLING		jennifer.bump@emsmc.com
City of Calexico Fire Department EMS Division		jennifer.bump@emsmc.com
CITY OF CARLSBAD FIRE DEPARTMENT		jennifer.bump@emsmc.com
CITY OF CATHEDRAL CITY FIRE DEPARTMENT		jennifer.bump@emsmc.com
CITY OF CHARLESTON	Christina Merbedone-Byrd	christina.merbedone-byrd@cityofcharleston.org
CITY OF CHARLESTON	JASON NEAL	jason.neal@cityofcharleston.org
CITY OF CHARLESTON	Office of the City Attorney	jason.neal@cityofcharleston.org; christina.merbedone-byrd@cityofcharleston.org
City of Chula Vista		jennifer.bump@emsmc.com
CITY OF CORONADO FIRE DEPARTMENT		jennifer.bump@emsmc.com
CITY OF COSTA MESA FIRE DEPARTMENT		jennifer.bump@emsmc.com
CITY OF DOWNEY		jennifer.bump@emsmc.com
CITY OF EL SEGUNDO FIRE DEPARTMENT		jennifer.bump@emsmc.com
CITY OF ESCONDIDO		jennifer.bump@emsmc.com
City of Folsom Fire Department Ambulance Srvc		jennifer.bump@emsmc.com
CITY OF FOUNTAIN VALLEY		jennifer.bump@emsmc.com
CITY OF FULLERTON		jennifer.bump@emsmc.com
CITY OF HUNTINGTON BEACH		jennifer.bump@emsmc.com
CITY OF LA VERNE FIRE DEPARTMENT		jennifer.bump@emsmc.com
CITY OF LAGUNA BEACH		jennifer.bump@emsmc.com
CITY OF MONTEREY PARK FIRE DEPARTMENT		jennifer.bump@emsmc.com
CITY OF OCEANSIDE AMBULANCE		jennifer.bump@emsmc.com
CITY OF ORANGE FIRE DEPARTMENT		jennifer.bump@emsmc.com
CITY OF PALM DESERT		jennifer.bump@emsmc.com
CITY OF PETALUMA AMBULANCE		jennifer.bump@emsmc.com
CITY OF POWAY		jennifer.bump@emsmc.com
CITY OF RIALTO AMBULANCE SERVICE		jennifer.bump@emsmc.com

Tenth Omnibus Objection Claimants Service List
Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
City of Rocky Mount dba Tar RiverTransit	City of Rocky Mount / Tar River Transit	todd.gardner@rockymountnc.gov
CITY OF SACRAMENTO FIRE DEPARTMENT		jennifer.bump@emsmc.com
CITY OF SAN CLEMENTE FIRE DEPARTMENT		jennifer.bump@emsmc.com
CITY OF SAN GABRIEL FIRE DEPARTMENT		jennifer.bump@emsmc.com
CITY OF SAN MARINO FIRE DEPARTMENT		jennifer.bump@emsmc.com
City of San Rafael		jennifer.bump@emsmc.com
City of Santa Ana Fire		jennifer.bump@emsmc.com
CITY OF SIERRA MADRE EMS		jennifer.bump@emsmc.com
CITY OF SOUTH PASADENA FIRE DEPARTMENT		jennifer.bump@emsmc.com
City of South San Francisco		jennifer.bump@emsmc.com
CITY OF TORRANCE		jennifer.bump@emsmc.com
CITY OF VACAVILLE AMBULANCE		jennifer.bump@emsmc.com
CITY OF VISTA CALIFORNIA		jennifer.bump@emsmc.com
CITY OF WESTMINSTER		jennifer.bump@emsmc.com
COGENT COMMUNICATIONS, LLC		RBARSE@COGENTCO.COM
		mkolesar@aim-system.com; shareesmith@aim-system.com; rwilliamson@colcoems.com
Columbus County EMS Inc	Raven Williamson	rwilliamson@colcoems.com
COLUMBUS COUNTY EMS INC		rwilliamson@colcoems.com
Columbus Transport Inc	EMSMC	hipaacompliance@emsmc.com
Columbus Transport Inc		hipaacompliance@emsmc.com
Community Action Partnership of Mid-Nebraska		ljackman@mnca.net
ComplianceLine, LLC dba Ethico		teambilling@ethico.com
COSTA TRANSPORTATION LLC		costatransportation@yahoo.com
County of Bladen dba Bladen County EMS		dhowell@bladenco.org
County of Stanly dba Stanly County EMS	Annette Howell	ahowell@stanlycountync.gov

Exhibit F

Exhibit F

Tenth Omnibus Objection Claimants Service List
Served via First Class Mail

CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
BLACK & WHITE TAXI & CAB CO LLC		4665 WEST BANCROFT ST		TOLEDO	OH	43615
Canon Financial Services, Inc.	Attn Amar A. Agrawal, Esquire	Eisenberg, Gold & Agrawal, P.C	1040 North Kings Highway, Suite 200	Cherry Hill	NJ	08034
Canon Financial Services, Inc.	Attn Charles Profera III	158 Gaither Drive, Suite 200		Mount Laurel	NJ	08054
CAPE COUNTY PRIVATE AMBULANCE SERVICE		1458 N KINGSHIGHWAY		CAPE GIRARDEAU	MO	63701
CITY OF OCEANSIDE AMBULANCE		PO BOX 269110		SACRAMENTO	CA	95826
City of Rocky Mount dba Tar RiverTransit	City of Rocky Mount / Tar River Transit	Todd Gardner	331 South Franklin Street	Rocky Mount	NC	27802
City of Rocky Mount dba Tar RiverTransit		PO Box 1180		Rocky Mount	NC	27802
ComplianceLine, LLC dba Ethico		PO Box 604273		Charlotte	NC	28260-4273

Exhibit G

Exhibit G

Eleventh Omnibus Objection Claimants Service List
Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
Danville Life Saving and First Aid Crew Inc	EMSMC	hipaacompliance@emsmc.com
Danville Life Saving and First Aid Crew Inc		hipaacompliance@emsmc.com
Datavail Corporation	Banc of California	joan.stone@datavail.com
Datavail Corporation	c/o Joan Stone, CFO	joan.stone@datavail.com
Deerhold Ltd		akayastha@deerhold.com
DESERT VALLEY MEDICAL TRANSPORT INC		Shaun.Notary@gmr.net
Desoto Council on Aging	Cheryl Danette Lane	dcoa@bellsouth.net
DIGNITY RESPECT TRANSPORTATION LLC		rwill702@gmail.com
EBBETTS PASS FIRE DISTRICT		jennifer.bump@emsmc.com
EXCEL MEDICAL TRANSPORTATION LLC	Khalid Mohamed	wahajhajo@gmail.com
EXCEL MEDICAL TRANSPORTATION LLC		emtmedicaltransportation@gmail.com
Falcon Critical Care Transport, LLC	Tammy Collins	tcollins@falconcct.com
Federal Insurance Company on its Own Behalf and on Behalf of all Federal Companies	Attn Wendy M. Simkulak, Esq	wmsimkulak@duanemorris.com
FIRSTMED AMBULANCE SERVICES, INC.		kbableyan@firstmedambulance.com
		ride@primecaretransport.com;
For Senior Help, LLC		tyjones@primecaretransport.com
FORESTHILL FIRE DEPARTMENT		jennifer.bump@emsmc.com
Friedlander Group inc		adamf@friedlerlandergroup.com
FUTURES UNLIMITED INC		mariaac@futures-unlimited.org
GARDEN COUNTY PUBLIC TRANSPORTATION	AMY LEACH	transit@gardencounty.ne.gov
GATOR FREIGHTER SERVICES, LLC	WHEELCHAIR STRETCHER LIMO	gatorfreightersvs@gmail.com
GeBBS Healthcare Solutions Inc	Meelan Gupta	meelan.gupta@gebbs.com
GeBBS Healthcare Solutions Inc	Sachi Tiwary	sachi.tiwary@gebbs.com
Genesys Cloud Services Inc.	Attn Allen Chiu	allen.chiu@genesys.com
		annie.stoops@afslaw.com;
Genesys Cloud Services Inc.	Attn Annie Y. Stoops, Shannon W. Rieger	shannon.rieger@afslaw.com
	VANGUARD CLEANING SYSTEMS OF NORTHERN NEW JERSEY	arsupport@vanguardcleaning.com;
GJLT MANAGEMENT LLC		ggressler@vanguardcleaning-pa.com
Gold Coast Ambulance Service		Shaun.Notary@gmr.net
Granville EMS	EMSMC	hipaacompliance@emsmc.com
Granville EMS		hipaacompliance@emsmc.com
HALL AMBULANCE SERVICE INC	MARY BUCKLES	bucklesm@hallamb.com
HART TO HEART AMBULANCE SERVICE, INC.		kelly@h2htransportation.com
Heartland Ambulance Service LLC	Margaret Compton	mcompton@physiciansamb.com
Heartland Ambulance Service, LLC		mcompton@physiciansamb.com
Hemet Valley Ambulance Service, Inc.	Shaun Notary	shaun.notary@gmr.net
Herren Enterprises, Inc.	Shaun Notary	shaun.notary@gmr.net
Hidalgo County	c/o Diane W. Sanders	austin.bankruptcy@lgbs.com
Huron Group, Inc.	Kathleen Linhardt	klinhardt@ellicottdevelopment.com
Imperial Ambulance Inc.	Anna George	ageorge@aavems.com
Imperial Ambulance Inc.	Imperial Ambulance	ageorge@aavems.com
International Life Support, Inc.	Shaun Notary	shaun.notary@gmr.net
Iredell County EMS	EMSMC	hipaacompliance@emsmc.com
Iredell County EMS		hipaacompliance@emsmc.com
ISERVED TRANSPORTATION	DEAUNTAE FLANAGAN	Dflanagan@iservedtransport.com
JACKSON COUNTY FIRE RESCUE	EMSMC	hipaacompliance@emsmc.com
		BrunnerC@jacksoncountyfl.gov;
JACKSON COUNTY FIRE RESCUE		hipaacompliance@emsmc.com
JACKSON COUNTY FIRE RESCUE		hipaacompliance@emsmc.com
Jackson Parish Ambulance Service District	Insight Billing Corporation	scott.shurley@insightbillingcorp.com
Jackson Parish Ambulance Service District		officemanager@jpsd.com
JMJ Solutions Inc.	Jerome A. Gifts	jmjsolutions1@yahoo.com
Keystone Quality Transport	c/o Jeffrey Kurtzman, Esquire	Kurtzman@kurtzmansteady.com
		JMISNER@KQHEALTH.COM;
Keystone Quality Transport		tstrine@gmail.com
KIWI EMERGENCY MEDICAL SERVICES	EMSMC	hipaacompliance@emsmc.com
KIWI EMERGENCY MEDICAL SERVICES		hipaacompliance@emsmc.com
LASALLE GENERAL HOSPITAL AMBULANCE SVC		tthacker@lgh-jena.org
LEGERE PROPERTIES LLC		Jeff@Legere.ws
		EBROWNEMARKE@GMAIL.COM;
LEONE FREIGHT SERVICES LLC	EDWARD BROWNE-MARKE	Leonetrans2021@gmail.com
		shaun.notary@gmr.net;
LifeFleet Southeast, Inc.	Shaun Notary	greg.kelminson@gmr.net
Lifeguard Ambulance Service LLC	Shaun Notary	Shaun.Notary@gmr.net
LIFEGUARD AMBULANCE SERVICE OF FLORIDA LLC	SHAUN NOTARY	Shaun.Notary@gmr.net

Exhibit G

Eleventh Omnibus Objection Claimants Service List
Served via Electronic Mail

CreditorName	CreditorNoticeName	Email
Lifestar Response of Maryland, Inc.	c/o Jeffrey Kurtzman, Esquire	kurtzman@kurtzmansteady.com
Lifestar Response of Maryland, Inc.		tstrine@gmail.com
Lifestream Transportation Inc		Lifestreaminc247@gmail.com
LJL TRUCKING INC DBA MED-VAN TRANSPORT	LORI KIME	LORI@MED-VAN.COM
Madison County Transportation Authority		phagerman@madisoncountync.gov
Madison Medics	EMSMC	hipaacompliance@emsmc.com
Madison Medics	MADISON MEDICS LP	hipaacompliance@emsmc.com
Madison Medics		hipaacompliance@emsmc.com
MCCLLOUD COMMUNITY SERVICE DISTRICT		jennifer.bump@emsmc.com
Mecklenburg EMS Agency		shellym@medic911.com
		shellym@medic911.com;
Mecklenburg EMS Agency		PFS@medic911.com
Medevac MidAmerica, Inc.	Shaun Notary	shaun.notary@gmr.net
MEDIC 1 AMBULANCE SERVICE INC	RESCUE SERVICES INTERNATIONAL LTD.	swestrack@ambuserve.net
Medical Emergency Ambulance Transport Inc	EMSMC	hipaacompliance@emsmc.com
Medical Emergency Ambulance Transport Inc		hipaacompliance@emsmc.com
Medics Ambulance Service, Inc.	Shaun Notary	shaun.notary@gmr.net
Medstar Ambulance of Mendocino County		jennifer.bump@emsmc.com
Mercury Ambulance Service, Inc.	Shaun Notary	shaun.notary@gmr.net
Mercy Ambulance of Evansville, Inc.	Shaun Notary	Shaun.Notary@gmr.net
METRO AMBULANCE SERVICES RURAL INC		Shaun.Notary@gmr.net
		milestonenemtllc@gmail.com;
MILESTONE NEMT LLC	MAXINE RANDOLPH	maxinerandolph@icloud.com
MOBILE MEDIC AMBULANCE SERVICE INC		Shaun.Notary@gmr.net
MONTEREY COUNTY REGIONAL FPD		jennifer.bump@emsmc.com
MORAGA ORINDA FIRE DISTRICT		jennifer.bump@emsmc.com
MOULTRIE COUNTY COLLECTOR	STEPHANIE L. HELMUTH	stephanie.helmuth@moultriecountyil.gov
NATIONAL MOBILITY ELDERCARE INC	HANIA KANAAN	hkanaan@envoyamerica.com
Newport Beach Fire Department Paramedic Service		jennifer.bump@emsmc.com
		abrown@klestadt.com;
NJ Mobile Health Care LLC	Klestadt Winters Jureller Southard Stevens, LLP	tklestadt@klestadt.com
NJ Mobile Health Care LLC		louis.greco@njmhc.com

Exhibit H

Exhibit H

Eleventh Omnibus Objection Claimants Service List
Served via First Class Mail

CreditorName	CreditorNoticeName	Address1	Address2	City	State	Zip
DESOTO COUNCIL ON AGING INC		PO BOX 996		MANSFIELD	LA	71052
Federal Insurance Company on its Own Behalf and on Behalf of all Federal Companies	Chubb	Attn Adrienne Logan	436 Walnut Street	Philadelphia	PA	19106
Friedlander Group inc		2500 Westchester Avenue, Suite 400A		Purchase	NY	10577
Iredell County EMS		PO Box 863		Lewisville	NC	27023

Exhibit I

Exhibit I

**Twelfth Omnibus Objection Claimants Service List
Served via Electronic Mail**

CreditorName	CreditorNoticeName	Email
NORTH COUNTY FIRE PROTECTION DISTRICT		jennifer.bump@emsmc.com
NORTH TAHOE FIRE DISTRICT		jennifer.bump@emsmc.com
Novant Health New Hanover Regional EMS	EMSMC	hipaacompliance@emsmc.com
Novant Health New Hanover Regional EMS		hipaacompliance@emsmc.com
Ohio Department of Job and Family Services - OLAS		UIBankruptcy@jfs.ohio.gov
Pafford Emergency Medical Services, Inc	Larry Clark	lclark@paffordems.com
Pafford EMS of Mississippi, Inc	Larry Clark	lclark@paffordems.com
Paramedics Logistics Holding Company LLC	Taylor Roland	troland@pcls-us.com; mdost@pcls-us.com
PAVILION UNIT ACQUISITION LP	MANAGEMENT OFFICE	tgale@galmangroup.com
Penn Valley Fire Protection District		jennifer.bump@emsmc.com
PHI Health LLC DbA PHI Air Medical	PHI Air Medical	myphiadvocate@phiairmedical.com
Physicians Surgeons Ambulance Service, Inc.	Shaun Notary	shaun.notary@gmr.net
PIEDMONT REGIONAL COMMUNITY SERVICES		cpilson@pedmontscsb.org
Prodigy Resources LLC		accounting@prodigy.com
Propio LS LLC	c/o Accounts Receivable	sinatra.brown@propio.com
ProTransport-1 LLC	Ana Arechiga	RCM@covalent-health.com
ProTransport-1 LLC		RCM@covalent-health.com
PROVIDENCE TRANSPORTATION INC	EMSMC	hipaacompliance@emsmc.com
PROVIDENCE TRANSPORTATION INC		hipaacompliance@emsmc.com
QUALTRICS LLC		AR@qualtrics.com; bankruptcy@qualtrics.com
Randstad US		ar.credit@randstadusa.com; rt-customerservice@randstadusa.com
REACH Air Medical Services LLC	Jody C Tullos	jody.tullos@gmr.net;
REACH Air Medical Services LLC		greg.kelminson@gmr.net
REACH Air Medical Services LLC		jody.tullos@gmr.net
REGIONAL EMERGENCY MEDICAL SERVICES AUTH		ppayne@remsahealth.com
RELIABLE HANDS TRANSPORTATION LLC		nealvicky@ymail.com
RENO CAB COMPANY INC	ExecutiveLimousine Service	Robin@renocab.com
RENO CAB COMPANY INC		LINDA@RENOCAB.COM
Renova Technology Incorporated		accounting@renovatechnology.com
REVIEWED COSTS INC	TODD COHEN	tcohen@industrialui.com
RICHMOND AMBULANCE AUTHORITY	EMSMC	hipaacompliance@emsmc.com
RICHMOND AMBULANCE AUTHORITY		hipaacompliance@emsmc.com
RIDGE AMBULANCE SERVICE INC	YSATIS BUELENS	ybuelens@ridgeems.com
RITAS TRANSPORTATION SERVICE LLC	RITA CLAIBORNE	RITASHAN08@YAHOO.COM
Rockingham County EMS	EMSMC	hipaacompliance@emsmc.com
Rockingham County EMS	Rodney Stewart	hipaacompliance@emsmc.com
Rockingham County EMS		hipaacompliance@emsmc.com
Ronald McDonald House Charities of Greater Charlotte, Inc.	Denise Cubbedge	denise@rmhclt.org
ROSS VALLEY PARAMEDIC AUTHORITY		jennifer.bump@emsmc.com
ROYAL AMBULANCE INC.	IN-HOUSE COUNSEL	INFO@ROYALAMBULANCE.COM; LEGAL@ROYALAMBULANCE.COM; johnrey.hassan@royalambulance.com
ROYALTY AMBULANCE SERVICES INC		ABABLEYAN@ROYALTYAMBULANCE.COM; BILLING@ROYALTYAMBULANCE.COM
Rural Metro of California, Inc.	Shaun Notary	shaun.notary@gmr.net
Rural/Metro of Southern Ohio, Inc.	Shaun Notary	shaun.notary@gmr.net
Rutherford County EMS	EMSMC	hipaacompliance@emsmc.com
Rutherford County EMS		hipaacompliance@emsmc.com
SACRAMENTO METROPOLITAN FIRE DISTRICT		jennifer.bump@emsmc.com
SACRED HEART HEALTH SERVICES		heather.stacken@avera.org
SAN LUIS AMBULANCE SERVICE, INC.	JODY J SOULE	soulemates@aol.com; jody@sla.md; elaine@sla.md
Scotland County Ambulance District	Jeffrey Roorda	jroorda@proclaimsbilling.com
SHEN PACO INDUSTRIES INC	BARBIE RHODES, EXECUTIVE DIRECTOR	brhodes@shenpaco.com
SIERRA AMBULANCE SERVICE, INC		taneisha.cockerham@sierraambulance.org; info@sierraambulance.org
Softserve Inc.		legal@softserveinc.com
Sonoma County Fire & Rescue Auth		jennifer.bump@emsmc.com
SOUTH LAKE COUNTY FIRE PROTECTION		jennifer.bump@emsmc.com
SOUTH PLACER FIRE DEPARTMENT		jennifer.bump@emsmc.com
South San Joaquin County Fire Authority		jennifer.bump@emsmc.com
SOUTHERN MARIN EMERGENCY MEDICAL PARAMEDICS SYSTEMS		jennifer.bump@emsmc.com

**Twelfth Omnibus Objection Claimants Service List
Served via Electronic Mail**

CreditorName	CreditorNoticeName	Email
SPECIALTEE TRANSPORTATION		mstiffany_wilson@yahoo.com
Specialty Needs Transportation, Inc.		chrismvandenberga@amb-tran.com
SPRINGS AMBULANCE SERVICE INC		Shaun.Notary@gmr.net
Straightway Transportation LLC	Attn Megan Young-John	myoung-john@porterhedges.com;
Straightway Transportation LLC	Raylor Adames	raylor@straightwaynj.com
SUPERIOR AIR-GROUND AMBULANCE SERVICE, INC.	Illinois Medi-Car, Inc.	pparent@superiorambulance.com
SUPERIOR AIR-GROUND AMBULANCE SERVICE, INC.	Superior Air-Ground Ambulance Service of Ohio, Inc.	pparent@superiorambulance.com
SUPERIOR AIR-GROUND AMBULANCE SERVICE, INC.		pparent@superiorambulance.com
Swain County EMS	EMSMC	hipaacompliance@emsmc.com
Swain County EMS		hipaacompliance@emsmc.com
THE SABINE COUNCIL ON THE AGING INC		vweaver@sabinecoa.org
TLC TRANSIT LLC		info@tlctransit.com;
TRACE AMBULANCE, INC.		akruse@tlctransit.com
TriCounty Ambulance Inc		CHRISVANDENBERG@AMB-TRAN.COM
TRITEC OFFICE EQUIPMENT INC		sfarrell@tricountyambulance.com
TRUST CARE AND ASSOCIATES MEDICAL TRANSPORTATION INC		NZARRO@TRITECRICOH.COM
TSO ICP LP	Attn Kennedy Bodnarek	trustcaremt@gmail.com
TSO ICP LP		kennedy.bodnarek@alston.com
TSO ICP, LP	Attn A. Boyd Simpson	crystal@simpsonorg.com
TSO ICP, LP	Attn Gil Hearn	boyd@simpsonorg.com
Uber Health LLC	Jenner and Block LLP	gil@simpsonorg.com
Uber Health LLC	Niels Melius	mroot@jenner.com;
UnitedHealthcare Insurance Company	Attn Eric Goldstein	csteedge@jenner.com
UnitedHealthcare Insurance Company	CDM/Bankruptcy	nielsm@uber.com;
UNIVERSAL TRANSPORTATION LLC		jens@uber.com
Victory Transports Inc	Jennifer Roark	egoldstein@goodwin.com
Virginia Medical Transport LLC	Shaun Notary	jayson_ronning@uhc.com
VXI Global Solutions, LLC	Aileen Tang	johnson1980bcj@gmail.com
VXI Global Solutions, LLC	Joe A. Moe, II	victorytransportsinc@gmail.com
Wakefern Food Corp.	McGrail Bensinger LLP	Shaun.Notary@gmr.net
Wakefern Food Corp.	Michael C. Falk, Esq.	aileen.tang@vxi.com
Westmed Ambulance, Inc.	Shaun Notary	john.moe@dentons.com
WHC FL LLC DBA zTRIP		ivolkov@mcgrailbensinger.com
WHC FL LLC DBA zTRIP		michael.falk@wakefern.com
WHC Worldwide		Shaun.Notary@gmr.net
WPENGINE INC		ar@ztrip.com
WP Engine, Inc.	Lanee Fox	fschemmel@ztrip.com
		fschemmel@ztrip.com
		AR@WPENGINE.COM
		legal@wpengine.com

Exhibit J

Exhibit J

Twelfth Omnibus Objection Claimants Service List
Served via First Class Mail

CreditorName	CreditorNoticeName	Address1	City	State	Zip
Ohio Department of Job and Family Services - OLAS	Ohio Attorney General	P.O. Box 89471	Cleveland	OH	44101-6471
PARAMEDICS LOGISTICS HOLDING COMPANY LLC		12200 US HIGHWAY 19 N	HUDSON	FL	34667
Rutherford County EMS		PO Box 309	Lewisville	NC	27023
SAN RAMON VALLEY FIRE DEPARTMENT		1500 BOLLINGER CANYON RD	SAN RAMON	CA	94583
SAN RAMON VALLEY FIRE DEPARTMENT		PO BOX 269110	SACRAMENTO	CA	95826
SCOTLAND COUNTY AMBULANCE DISTRICT		435 E GRAND AVE	MEMPHIS	MO	63555-1501
SIERRA AMBULANCE SERVICE, INC		P.O. BOX 2307	OAKHURST	CA	93644
WPENGINE INC		PO BOX 734427	DALLAS	TX	75373-4427

Exhibit K

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

----- X
 In re: : Chapter 11
 :
 MODIVCARE INC., *et al.*, : Case No. 25-90309 (ARP)
 :
 Reorganized Debtors.¹ : (Jointly Administered)
 :
 ----- X

NOTICE OF REORGANIZED DEBTORS’ NINTH OMNIBUS CLAIM OBJECTION

This is an objection to your claim. This objection asks the Court to disallow the claim you filed in this 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.

Claimants receiving this notice (this “Notice”) should locate the affected claims and the name of the creditor who filed it on the exhibits attached to the Omnibus Objection (as defined below). If you do not file a response by April 30, 2026, at 4:00 p.m. (prevailing Central Time), your claim may be disallowed without a hearing.

If you timely file a response that cannot be resolved, a hearing will be scheduled.

INTRODUCTION

Why am I receiving this document? You are receiving this Notice because ModivCare Inc. and its debtor affiliates (referred to as the “*Reorganized Debtors*”) have filed the Objection attached hereto as **Appendix 1** (the “*Omnibus Objection*”) to your claim(s).²

Why is my claim being objected to? As summarized in the exhibit(s) to the Omnibus Objection, the Reorganized Debtors believe that the Proof of Claim that you filed or that was filed on your behalf is deficient because: the claim embodied in the Proof of Claim was satisfied through the Cure Amounts for applicable Designated Contract.

Where can I find out which claim is being objected to? The appendices attached hereto contain information needed for you to search for and identify the name of the creditor who filed the

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.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Omnibus Objection.

disputed claim, as well as the number of the claim as it appears on the claims register maintained by the Reorganized Debtors' Claims and Noticing Agent.

What do I need to do? If you disagree with the grounds of the objection, you must file a response (each, a "**Response**") with the United States Bankruptcy Court for the Southern District of Texas (the "**Court**") and send a copy to the Reorganized Debtors' attorneys pursuant to the procedures set forth below by no later than **April 30, 2026, at 4:00 p.m. (prevailing Central Time)**.

Where can I find out more information? To obtain more information about the Omnibus Objection, you can contact counsel to the Reorganized Debtors listed below. These attorneys represent the Reorganized Debtors and cannot give you legal advice. If you are seeking advice about your legal rights, you should consult your own attorney.

How do I file a response? To respond to this objection, you will need to state in writing why you believe the Omnibus Objection should be overruled in accordance with the Objection Procedures (as defined below). Any such response will need to be filed with the Court. More information on how to file documents with the Court can be found on the Court's website at <https://www.txs.uscourts.gov> or call the clerk's office at 713-250-5500. **Please do not contact the Court to discuss the merits of your Claim or the objection. The Court cannot give you legal advice.**

When do I need to file my response? Your Response must be filed no later than **April 30, 2026, at 4:00 p.m. (prevailing Central Time)**. If you do not respond by that date, **your Claim may be disallowed and expunged without further notice to you.**

IMPORTANT INFORMATION REGARDING THE OBJECTION

Grounds for the Omnibus Objection. By the Omnibus Objection, the Reorganized Debtors are seeking to **disallow and expunge** your Claim(s) based on the grounds set forth in the Omnibus Objection.

Omnibus Objection Procedures. On February 19, 2026, the Court entered an order [Docket No. 1313] approving procedures, a copy of which are attached hereto as **Appendix 2**, for filing and resolving omnibus objections to claims asserted against the Reorganized Debtors in the Chapter 11 Cases (the "**Objection Procedures**").

Please review the response procedures for resolving the Omnibus Objection to ensure your response to the Omnibus Objection, if any, is timely and correctly filed.

RESPONSE PROCEDURES FOR RESOLVING THE OMNIBUS OBJECTION

Parties Required to File a Response. If you disagree with the Omnibus Objection filed against your Claim, you must file a Response with the Court in accordance with the Objection Procedures and appear at a hearing on the matter.

Response Contents. The Objection Procedures requires that each Response must contain the following information (at a minimum):

a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the title of the Omnibus Objection to which the Response is directed;

a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to your Claim or Proof of Claim, including the specific factual and legal bases upon which you rely in opposing the Omnibus Objection; and

the following contact information for the responding party:

the name, mailing address, telephone number, and email address of the responding claimant, or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the Reorganized Debtors' counsel should serve a reply to the Response, if any; or

the name, mailing address, telephone number, and email address of the party with authority to reconcile, settle, or resolve the Omnibus Objection on your behalf.

Notice and Service. Your Response must be filed with the Court by **April 30, 2026**, at 4:00 p.m. (prevailing Central Time) unless otherwise ordered by the Court.

Failure to Respond. **Failure to timely file a Response as set forth herein or to appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

Hearing. If a Response is timely filed that cannot be resolved, the Court will hold an initial hearing. The initial hearing will be non-evidentiary and used as a scheduling conference. **Failure to appear at the initial hearing may result in the summary disposition of the objection.**

Discovery. If any party determines that discovery is necessary in advance of a hearing on an Omnibus Objection, the party may serve notice on the affected Reorganized Debtor or claimant and its counsel of record. Failure to comply with this paragraph will not preclude a party from later seeking discovery.

ADDITIONAL INFORMATION

Questions or Information. Copies of all pleadings filed in the Chapter 11 Cases (including the Omnibus Objection) are available at no cost on the website maintained by the Reorganized Debtors' Claims and Noticing agent at <https://www.veritaglobal.net/ModivCare>. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: <https://ecf.txsb.uscourts.gov>. **Please do not contact the Court to discuss the merits of any Claim or Objection.**

RESERVATION OF RIGHTS

Nothing in the Omnibus Objection or this Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Appendix 1

Omnibus Objection

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

**REORGANIZED DEBTORS’ NINTH
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.

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 “*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.

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*, (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

³ 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.⁴ 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*

⁴ “**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 Schedules⁵ (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**”).⁶

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,⁷ March 29, 2026 (*i.e.*, the date that is ninety (90) days after the occurrence of the Effective Date).⁸ 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.⁹

⁵ 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.

⁶ 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.”).

⁷ *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.”).

⁸ 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.

⁹ *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,¹⁰ 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

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.").

¹⁰ 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' Ninth 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 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/ Jason W. Harbour

HUNTON ANDREWS KURTH LLP

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

Jason W. Harbour (Virginia Bar No. 68220)

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

jharbour@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 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/ Jason W. Harbour

Jason W. Harbour

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’
NINTH 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’ Ninth Omnibus Objection to Certain Claims* (the “*Objection*”)² 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

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.

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. ¹	: (Jointly Administered)
	:
-----	X

**ORDER GRANTING REORGANIZED DEBTORS’
NINTH 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 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

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.

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

					Asserted Claim Amount	
#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Claim Amount
1	1590 ADAMSON LLC	ModivCare Solutions, LLC	230	9/15/2025	General Unsecured Priority Secured Admin Priority Total	434,909 - - - \$ 434,909
2	400 Southborough, LLC, Successor in Interest to RREEF America REIT III Z4 LLC	ModivCare Solutions, LLC	681	9/23/2025	General Unsecured Priority Secured Admin Priority Total	14,525 - - - \$ 14,525
3	ABINGDON AMBULANCE SERVICE	ModivCare Inc.	1063	9/30/2025	General Unsecured Priority Secured Admin Priority Total	106,890 - - - \$ 106,890
4	AFFORDABLE TRANSPORT INC	ModivCare Solutions, LLC	944	9/25/2025	General Unsecured Priority Secured Admin Priority Total	227,697 - - - \$ 227,697
5	Alamance County Emergency Medical Service	ModivCare Inc.	1557	10/1/2025	General Unsecured Priority Secured Admin Priority Total	16,785 - - - \$ 16,785
6	Albemarle Medical Transport INC	ModivCare Inc.	21	8/27/2025	General Unsecured Priority Secured Admin Priority Total	19,743 - - - \$ 19,743
7	ALPHAONE AMBULANCE MEDICAL SERVICES, INC.	ModivCare Inc.	800	9/26/2025	General Unsecured Priority Secured Admin Priority Total	737,636 - - - \$ 737,636
8	Ambuserve Inc.	ModivCare Inc.	1517	10/1/2025	General Unsecured Priority Secured Admin Priority Total	98,410 - - - \$ 98,410
9	American Ambulance of Visalia	ModivCare Solutions, LLC	534	9/22/2025	General Unsecured Priority Secured Admin Priority Total	77,858 - - - \$ 77,858
10	AMERICAN AMBULANCE OF VISALIA	ModivCare Solutions, LLC	1159	9/30/2025	General Unsecured Priority Secured Admin Priority Total	42,970 - - - \$ 42,970

					Asserted Claim Amount	
#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Claim Amount
11	AMERICAN AMBULANCE OF VISALIA	ModivCare Solutions, LLC	1191	9/30/2025	General Unsecured Priority Secured Admin Priority Total	34,888 - - - \$ 34,888
12	American Ground Transportation	ModivCare Inc.	819	9/25/2025	General Unsecured Priority Secured Admin Priority Total	397,872 - - - \$ 397,872
13	AMERICAN LEGION POST NO. 108 AMBULANCE SERVICE	ModivCare Inc.	1352	10/1/2025	General Unsecured Priority Secured Admin Priority Total	790,205 - - - \$ 790,205
14	American Medical Response Ambulance Service, Inc.	ModivCare Inc.	1455	10/1/2025	General Unsecured Priority Secured Admin Priority Total	1,157,586 - - - \$ 1,157,586
15	American Medical Response Mid- Atlantic Inc	ModivCare Inc.	1460	10/1/2025	General Unsecured Priority Secured Admin Priority Total	602,247 - - - \$ 602,247
16	American Medical Response of Inland Empire	ModivCare Inc.	1457	10/1/2025	General Unsecured Priority Secured Admin Priority Total	284,186 - - - \$ 284,186
17	American Medical Response of Maricopa, LLC	ModivCare Inc.	1470	10/1/2025	General Unsecured Priority Secured Admin Priority Total	1,436 - - - \$ 1,436
18	American Medical Response of New York, LLC	ModivCare Inc.	1462	10/1/2025	General Unsecured Priority Secured Admin Priority Total	222,523 - - - \$ 222,523
19	AMERICAN MEDICAL RESPONSE OF SAN DIEGO INC	ModivCare Inc.	1465	10/1/2025	General Unsecured Priority Secured Admin Priority Total	27,739 - - - \$ 27,739
20	American Medical Response of Southern California	ModivCare Inc.	1474	10/1/2025	General Unsecured Priority Secured Admin Priority Total	245,883 - - - \$ 245,883

					Asserted Claim Amount	
#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Claim Amount
21	American Medical Response West	ModivCare Inc.	1480	10/1/2025	General Unsecured Priority Secured Admin Priority Total	719,938 - - - \$ 719,938
22	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	666	9/23/2025	General Unsecured Priority Secured Admin Priority Total	7,038 - - - \$ 7,038
23	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	658	9/23/2025	General Unsecured Priority Secured Admin Priority Total	5,779 - - - \$ 5,779
24	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	868	9/29/2025	General Unsecured Priority Secured Admin Priority Total	5,596 - - - \$ 5,596
25	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	857	9/29/2025	General Unsecured Priority Secured Admin Priority Total	5,540 - - - \$ 5,540
26	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	660	9/23/2025	General Unsecured Priority Secured Admin Priority Total	5,406 - - - \$ 5,406
27	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	668	9/23/2025	General Unsecured Priority Secured Admin Priority Total	5,033 - - - \$ 5,033
28	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	871	9/29/2025	General Unsecured Priority Secured Admin Priority Total	5,000 - - - \$ 5,000
29	American Professional Ambulance	ModivCare Inc.	748	9/24/2025	General Unsecured Priority Secured Admin Priority Total	4,700 - - - \$ 4,700
30	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	697	9/24/2025	General Unsecured Priority Secured Admin Priority Total	4,589 - - - \$ 4,589

#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Asserted Claim Amount	
						Claim Amount	Claim Amount
31	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	859	9/29/2025	General Unsecured Priority Secured Admin Priority Total	4,537 - - - \$ 4,537	4,537
32	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	751	9/24/2025	General Unsecured Priority Secured Admin Priority Total	4,504 - - - \$ 4,504	4,504
33	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	806	9/26/2025	General Unsecured Priority Secured Admin Priority Total	4,496 - - - \$ 4,496	4,496
34	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	692	9/24/2025	General Unsecured Priority Secured Admin Priority Total	4,258 - - - \$ 4,258	4,258
35	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	665	9/23/2025	General Unsecured Priority Secured Admin Priority Total	4,041 - - - \$ 4,041	4,041
36	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	858	9/29/2025	General Unsecured Priority Secured Admin Priority Total	4,000 - - - \$ 4,000	4,000
37	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	860	9/29/2025	General Unsecured Priority Secured Admin Priority Total	3,960 - - - \$ 3,960	3,960
38	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	866	9/29/2025	General Unsecured Priority Secured Admin Priority Total	3,812 - - - \$ 3,812	3,812
39	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	694	9/24/2025	General Unsecured Priority Secured Admin Priority Total	3,762 - - - \$ 3,762	3,762
40	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	780	9/25/2025	General Unsecured Priority Secured Admin Priority Total	3,756 - - - \$ 3,756	3,756

					Asserted Claim Amount	
#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Claim Amount
41	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	805	9/26/2025	General Unsecured Priority Secured Admin Priority Total	3,732 - - - \$ 3,732
42	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	856	9/29/2025	General Unsecured Priority Secured Admin Priority Total	3,669 - - - \$ 3,669
43	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	747	9/24/2025	General Unsecured Priority Secured Admin Priority Total	3,592 - - - \$ 3,592
44	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	659	9/23/2025	General Unsecured Priority Secured Admin Priority Total	3,586 - - - \$ 3,586
45	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	855	9/29/2025	General Unsecured Priority Secured Admin Priority Total	3,578 - - - \$ 3,578
46	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	804	9/26/2025	General Unsecured Priority Secured Admin Priority Total	3,569 - - - \$ 3,569
47	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	863	9/29/2025	General Unsecured Priority Secured Admin Priority Total	3,516 - - - \$ 3,516
48	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	785	9/25/2025	General Unsecured Priority Secured Admin Priority Total	3,496 - - - \$ 3,496
49	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	699	9/24/2025	General Unsecured Priority Secured Admin Priority Total	3,493 - - - \$ 3,493
50	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	807	9/26/2025	General Unsecured Priority Secured Admin Priority Total	3,413 - - - \$ 3,413

					Asserted Claim Amount	
#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Claim Amount
51	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	864	9/29/2025	General Unsecured Priority Secured Admin Priority Total	3,392 - - - \$3,392
52	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	746	9/24/2025	General Unsecured Priority Secured Admin Priority Total	3,360 - - - \$3,360
53	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	854	9/29/2025	General Unsecured Priority Secured Admin Priority Total	3,302 - - - \$3,302
54	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	791	9/25/2025	General Unsecured Priority Secured Admin Priority Total	3,272 - - - \$3,272
55	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	703	9/24/2025	General Unsecured Priority Secured Admin Priority Total	3,227 - - - \$3,227
56	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	710	9/24/2025	General Unsecured Priority Secured Admin Priority Total	3,188 - - - \$3,188
57	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	809	9/26/2025	General Unsecured Priority Secured Admin Priority Total	3,156 - - - \$3,156
58	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	661	9/23/2025	General Unsecured Priority Secured Admin Priority Total	3,081 - - - \$3,081
59	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	867	9/29/2025	General Unsecured Priority Secured Admin Priority Total	2,892 - - - \$2,892
60	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	811	9/26/2025	General Unsecured Priority Secured Admin Priority Total	2,873 - - - \$2,873

#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Asserted Claim Amount	
						Claim Amount	Claim Amount
61	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	869	9/29/2025	General Unsecured Priority Secured Admin Priority Total	2,848 - - - \$ 2,848	2,848
62	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	808	9/26/2025	General Unsecured Priority Secured Admin Priority Total	2,776 - - - \$ 2,776	2,776
63	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	707	9/24/2025	General Unsecured Priority Secured Admin Priority Total	2,732 - - - \$ 2,732	2,732
64	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	862	9/29/2025	General Unsecured Priority Secured Admin Priority Total	2,700 - - - \$ 2,700	2,700
65	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	872	9/29/2025	General Unsecured Priority Secured Admin Priority Total	2,693 - - - \$ 2,693	2,693
66	American Professional Ambulance	ModivCare Inc.	749	9/24/2025	General Unsecured Priority Secured Admin Priority Total	2,640 - - - \$ 2,640	2,640
67	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	700	9/24/2025	General Unsecured Priority Secured Admin Priority Total	2,606 - - - \$ 2,606	2,606
68	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	803	9/26/2025	General Unsecured Priority Secured Admin Priority Total	2,552 - - - \$ 2,552	2,552
69	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	873	9/29/2025	General Unsecured Priority Secured Admin Priority Total	2,429 - - - \$ 2,429	2,429
70	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	810	9/26/2025	General Unsecured Priority Secured Admin Priority Total	2,333 - - - \$ 2,333	2,333

#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Asserted Claim Amount	
						Claim Amount	Claim Amount
71	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	802	9/26/2025	General Unsecured Priority Secured Admin Priority Total	2,217 - - - \$ 2,217	2,217
72	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	383	9/17/2025	General Unsecured Priority Secured Admin Priority Total	2,062 - - - \$ 2,062	2,062
73	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	875	9/29/2025	General Unsecured Priority Secured Admin Priority Total	849 - - - \$ 849	849
74	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	667	9/23/2025	General Unsecured Priority Secured Admin Priority Total	704 - - - \$ 704	704
75	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1064	9/30/2025	General Unsecured Priority Secured Admin Priority Total	638 - - - \$ 638	638
76	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1136	9/30/2025	General Unsecured Priority Secured Admin Priority Total	568 - - - \$ 568	568
77	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1119	9/30/2025	General Unsecured Priority Secured Admin Priority Total	552 - - - \$ 552	552
78	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1117	9/30/2025	General Unsecured Priority Secured Admin Priority Total	506 - - - \$ 506	506
79	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1112	9/30/2025	General Unsecured Priority Secured Admin Priority Total	474 - - - \$ 474	474
80	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1130	9/30/2025	General Unsecured Priority Secured Admin Priority Total	470 - - - \$ 470	470

					Asserted Claim Amount	
#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Claim Amount
81	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1146	9/30/2025	General Unsecured Priority Secured Admin Priority Total	430 - - - \$ 430
82	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1109	9/30/2025	General Unsecured Priority Secured Admin Priority Total	361 - - - \$ 361
83	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	380	9/17/2025	General Unsecured Priority Secured Admin Priority Total	360 - - - \$ 360
84	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	695	9/24/2025	General Unsecured Priority Secured Admin Priority Total	352 - - - \$ 352
85	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1007	9/30/2025	General Unsecured Priority Secured Admin Priority Total	351 - - - \$ 351
86	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1009	9/30/2025	General Unsecured Priority Secured Admin Priority Total	345 - - - \$ 345
87	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1087	9/30/2025	General Unsecured Priority Secured Admin Priority Total	335 - - - \$ 335
88	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	999	9/30/2025	General Unsecured Priority Secured Admin Priority Total	324 - - - \$ 324
89	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1062	9/30/2025	General Unsecured Priority Secured Admin Priority Total	318 - - - \$ 318
90	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1006	9/30/2025	General Unsecured Priority Secured Admin Priority Total	302 - - - \$ 302

#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Asserted Claim Amount	
						Claim Amount	Claim Amount
91	American Professional Ambulance	ModivCare Inc.	379	9/17/2025	General Unsecured Priority Secured Admin Priority Total	298 - - - \$ 298	
92	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1028	9/30/2025	General Unsecured Priority Secured Admin Priority Total	296 - - - \$ 296	
93	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1047	9/30/2025	General Unsecured Priority Secured Admin Priority Total	284 - - - \$ 284	
94	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1135	9/30/2025	General Unsecured Priority Secured Admin Priority Total	278 - - - \$ 278	
95	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1029	9/30/2025	General Unsecured Priority Secured Admin Priority Total	275 - - - \$ 275	
96	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1085	9/30/2025	General Unsecured Priority Secured Admin Priority Total	261 - - - \$ 261	
97	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1105	9/30/2025	General Unsecured Priority Secured Admin Priority Total	260 - - - \$ 260	
98	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1002	9/30/2025	General Unsecured Priority Secured Admin Priority Total	258 - - - \$ 258	
99	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1138	9/30/2025	General Unsecured Priority Secured Admin Priority Total	253 - - - \$ 253	
100	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1110	9/30/2025	General Unsecured Priority Secured Admin Priority Total	245 - - - \$ 245	

Appendix 2

Objection Procedures

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

----- X
In re: : Chapter 11
MODIVCARE INC., *et al.*, : Case No. 25-90309 (ARP)
Reorganized Debtors.¹ : (Jointly Administered)
----- X

PROCEDURES FOR FILING OMNIBUS CLAIMS OBJECTIONS

1. Grounds for Omnibus Objections. In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), the Reorganized Debtors² may file omnibus objections (each, an “*Omnibus Objection*”) to Claims on the grounds that such Claims, in part or in whole:

- (a) are inconsistent with the Reorganized Debtors’ books and records;
- (b) fail to specify the asserted Claim amount (or only list the Claim amount as “unliquidated”);
- (c) seek recovery of amounts for which the Reorganized Debtors are not liable;
- (d) are incorrectly or improperly classified, including, but not limited to, any Claims listed in the Claims Register or Reorganized Debtors’ Schedules as secured claims, priority claims, or under section 503(b)(9) of the Bankruptcy Code that are to be reclassified as unsecured claims, in whole or in part;
- (e) are filed against entities that are not Reorganized Debtors or against multiple Reorganized Debtors;
- (f) fail to specify a Reorganized Debtor against which the Claim is asserted;

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.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the *Motion of Reorganized Debtors for Entry of an Order Approving Procedures for Reorganized Debtors’ Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1201] (the “*Motion*”).

- (g) are disallowed pursuant to section 502 of the Bankruptcy Code;
- (h) fail to sufficiently specify the basis for the Claim or provide sufficient supporting documentation therefor;
- (i) are disallowed pursuant to, or asserted in an amount, priority, or on terms that are otherwise inconsistent with, the Plan or the Confirmation Order;
- (j) have been withdrawn by informal written (including email) agreement between the Reorganized Debtors and the Holder, but have not yet been formally withdrawn by the Holder through the submission via U.S. mail or email of a withdrawal of claim form (the “*Withdrawal Form*”) available on the Claims and Noticing Agent’s website pursuant to the instructions written on the Withdrawal Form (in which case, a copy of the writing or email evidencing such withdrawal shall be attached to the Omnibus Objection);
- (k) have been satisfied by payment in full or in part on account of such Claim pursuant to the relief granted in the First Day Orders or any other orders of the Court;
- (l) have been satisfied by payment in full or in part on account of such Claim from a non-Debtor party, including, but not limited to, one or more of the Reorganized Debtors’ insurers (in which case the details of payments must be included with the Omnibus Objection); or
- (m) are disallowed or subordinated to all Claims senior to or equal to the asserted Claim because such Claim arises out of the rescission of the purchase or sale of a security of a Reorganized Debtor (or an affiliate of a Reorganized Debtor) pursuant to section 510(b) of the Bankruptcy Code.

2. Naming Convention for Omnibus Objections. Each Omnibus Objection will be numbered consecutively, regardless of the basis for the objection(s) contained therein.

3. Supporting Documentation. To the extent necessary for an affected Holder to be able to understand the basis of the applicable Omnibus Objection, an Omnibus Objection shall include an affidavit or declaration that provides a factual basis for the Reorganized Debtors’ objection to the Claims in such Omnibus Objection in accordance with Bankruptcy Local Rule 3007-1(a).

4. Claims Exhibits. An exhibit listing the Claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the Claims to which

there is a common basis for the objection. Claims for which there are more than one basis for the objection will be referenced on each exhibit applicable thereto. The exhibits will include, without limitation, the following information, alphabetized by Holder:

- (a) the Claims that are the subject of the Omnibus Objection and, if applicable, the Proof of Claim number related thereto from the Claims Register or the number of the Claim listed in the Schedules;
- (b) the asserted amount of the Claim;
- (c) the asserted classification of such Claim as either secured, priority unsecured, or general unsecured;
- (d) a summary of the grounds for the objection;
- (e) where the Omnibus Objection contains more than one basis for objection(s) to the subject Claims, a cross-reference to the section of the Omnibus Objection discussing such Claim; and
- (f) other information reasonably necessary for the affected Holder to understand the Reorganized Debtors' proposed treatment of the relevant Claim, including (as applicable): (i) the proposed classification of Claims the Reorganized Debtors seek to reclassify, (ii) the reduced claim amounts of Claims the Reorganized Debtors seek to reduce, or (iii) the surviving Claims or Proofs of Claim of Holders affected by the Omnibus Objection.

5. Objection Notice. Each Omnibus Objection will be accompanied by a customized objection notice, substantially in the form annexed to the order granting the Motion (the "**Order**") as Exhibit 2 (the "**Objection Notice**"), tailored, as appropriate, to address the particular Omnibus Objection, which will:

- (a) adequately describe the nature of the objection;
- (b) inform Holders that their rights may be affected by the objection;
- (c) describe the procedures for filing a written response (each, a "**Response**") to the objection, including all relevant dates and deadlines related thereto;
- (d) identify the hearing date, if applicable, and related information; and
- (e) describe how copies of Proofs of Claim, the Omnibus Objection, and other pleadings filed in the Chapter 11 Cases may be obtained.

6. Notice and Service. Each Omnibus Objection will be filed with the Court and served electronically using the Court's electronic filing system. Each Omnibus Objection (along with a copy of the Objection Notice) will be served on each Holder of a Claim that is subject to such objection by email, where available, and first-class mail where email is not available.

7. No Hearing Required for Unopposed Omnibus Objections. Omnibus Objections may be filed without a hearing date. For Claims subject to an Omnibus Objection and for which either (a) no Response is filed in accordance with the proposed response procedures, or (b) a Response is filed in accordance with the proposed response procedures, but such Response is resolved, the Reorganized Debtors may file a certificate of no objection or certificate of counsel pursuant to the Complex Case Procedures, and the Court may enter an order sustaining the Omnibus Objection with respect to such Claims without a hearing. If a Response is filed in connection with an Omnibus Objection that cannot be resolved, the Reorganized Debtors shall schedule a hearing for such Omnibus Objection with respect to the contested Claim(s).

8. Omnibus Claims Objection Hearings. If a hearing is set for an Omnibus Objection, such hearing shall be set no less than 30 days after service of the Omnibus Objection, unless otherwise ordered by the Court. In the Reorganized Debtors' sole discretion, and after notice to the affected Holder(s), the Reorganized Debtors may (without further order of the Court) adjourn the hearing on the Omnibus Objection to a subsequent hearing date by filing a notice or statement on the record. For Claims subject to an Omnibus Objection and for which either a) no Response is filed in accordance with the response procedures set forth herein (the "**Response Procedures**") and no appearance is made at the hearing or (b) a Response is filed in accordance with the Response Procedures but such Response is resolved prior to the hearing, the Reorganized Debtors may request at the hearing that the Court enter an order sustaining the Omnibus Objection with respect

to such Claims. Contested Claims for which a Response is filed in accordance with the Response Procedures, but such Response is not resolved prior to the hearing and an appearance is made at the hearing may be heard at the hearing or adjourned to a subsequent hearing date in the Reorganized Debtors' sole discretion. If a subsequent hearing is determined to be necessary, the Reorganized Debtors shall file with the Court and serve on the affected Holders a notice of the hearing (the date of which shall be determined in consultation with the affected Holder(s)) or announce such adjournment on the record. Notwithstanding the foregoing, nothing herein shall prejudice the Reorganized Debtors' rights to seek entry of an order sustaining the Omnibus Objection as to any or all Claims contained therein, as applicable, pursuant to the Complex Case Procedures.

9. Contested Matter. Each Claim subject to an Omnibus Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such Claim. The Reorganized Debtors may, in their discretion and in accordance with other orders of this Court (including the Confirmation Order), and the provisions of the Bankruptcy Code and Bankruptcy Rules, settle the priority, amount, and validity of such contested Claims without any further notice to, or action, order, or approval of, the Court.

RESPONSES TO OMNIBUS OBJECTIONS

10. Parties Required to File a Response. Any party who disagrees with an objection is required to file a Response in accordance with the Response Procedures and to appear at the hearing, if one is set. If a Holder whose Claim is subject to an Omnibus Objection does not file a Response in compliance with the procedures set forth below or fails to appear at the hearing, if one is set, the Court may, in its discretion, sustain the objection with respect to such Claim without further notice to the Holder.

11. Response Contents. Each Response must contain the following (at a minimum):

- (a) a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the Omnibus Objection to which the Response is directed;
- (b) a concise statement setting forth the reasons why the Court should not grant the objection with respect to such Claim, including the factual and legal bases upon which the Holder will rely in opposing the Omnibus Objection; and
- (c) the following contact information for the responding party:
 - (i) the name, mailing address, telephone number, and email address of the responding Holder, or the name, mailing address, telephone number, and email address of the Holder's attorney or designated representative to whom the attorneys for the Reorganized Debtors should serve a reply to the Response, if any; or
 - (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the Holder's behalf.

12. Filing of the Response. A Response will be deemed timely only if it is filed with the Court no later than 4:00 p.m. (prevailing Central Time) on the day that is thirty (30) calendar days from the date the Omnibus Objection is served. The Response deadline shall be set forth in the Objection Notice.

13. Failure to Respond. **Failure to (a) timely file a Response as set forth herein or (b) appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected Holders will be served with such order.

14. Reply to a Response. The Reorganized Debtors shall be permitted, but not required, to file a reply to any Response prior to the initial hearing with respect to the relevant Omnibus Objection.

MISCELLANEOUS

15. Additional Information. Copies of these procedures, the Motion, the Order or any other pleadings filed in the Chapter 11 Cases are available at no cost on the website maintained by the Reorganized Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global, at <https://www.veritaglobal.net/ModivCare>. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: <https://ecf.txsb.uscourts.gov/>.

16. Reservation of Rights. Nothing in any Omnibus Objection or Objection Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Exhibit L

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

----- X
 :
 In re: : Chapter 11
 :
 MODIVCARE INC., *et al.*, : Case No. 25-90309 (ARP)
 :
 Reorganized Debtors.¹ : (Jointly Administered)
 :
 ----- X

NOTICE OF REORGANIZED DEBTORS' TENTH OMNIBUS CLAIM OBJECTION

This is an objection to your claim. This objection asks the Court to disallow the claim you filed in this 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.

Claimants receiving this notice (this “Notice”) should locate the affected claims and the name of the creditor who filed it on the exhibits attached to the Omnibus Objection (as defined below). If you do not file a response by April 30, 2026, at 4:00 p.m. (prevailing Central Time), your claim may be disallowed without a hearing.

If you timely file a response that cannot be resolved, a hearing will be scheduled.

INTRODUCTION

Why am I receiving this document? You are receiving this Notice because ModivCare Inc. and its debtor affiliates (referred to as the “*Reorganized Debtors*”) have filed the Objection attached hereto as **Appendix 1** (the “*Omnibus Objection*”) to your claim(s).²

Why is my claim being objected to? As summarized in the exhibit(s) to the Omnibus Objection, the Reorganized Debtors believe that the Proof of Claim that you filed or that was filed on your behalf is deficient because: the claim embodied in the Proof of Claim was satisfied through the Cure Amounts for applicable Designated Contract.

Where can I find out which claim is being objected to? The appendices attached hereto contain information needed for you to search for and identify the name of the creditor who filed the

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.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Omnibus Objection.

disputed claim, as well as the number of the claim as it appears on the claims register maintained by the Reorganized Debtors' Claims and Noticing Agent.

What do I need to do? If you disagree with the grounds of the objection, you must file a response (each, a "**Response**") with the United States Bankruptcy Court for the Southern District of Texas (the "**Court**") and send a copy to the Reorganized Debtors' attorneys pursuant to the procedures set forth below by no later than **April 30, 2026, at 4:00 p.m. (prevailing Central Time)**.

Where can I find out more information? To obtain more information about the Omnibus Objection, you can contact counsel to the Reorganized Debtors listed below. These attorneys represent the Reorganized Debtors and cannot give you legal advice. If you are seeking advice about your legal rights, you should consult your own attorney.

How do I file a response? To respond to this objection, you will need to state in writing why you believe the Omnibus Objection should be overruled in accordance with the Objection Procedures (as defined below). Any such response will need to be filed with the Court. More information on how to file documents with the Court can be found on the Court's website at <https://www.txs.uscourts.gov> or call the clerk's office at 713-250-5500. **Please do not contact the Court to discuss the merits of your Claim or the objection. The Court cannot give you legal advice.**

When do I need to file my response? Your Response must be filed no later than **April 30, 2026, at 4:00 p.m. (prevailing Central Time)**. If you do not respond by that date, **your Claim may be disallowed and expunged without further notice to you.**

IMPORTANT INFORMATION REGARDING THE OBJECTION

Grounds for the Omnibus Objection. By the Omnibus Objection, the Reorganized Debtors are seeking to **disallow and expunge** your Claim(s) based on the grounds set forth in the Omnibus Objection.

Omnibus Objection Procedures. On February 19, 2026, the Court entered an order [Docket No. 1313] approving procedures, a copy of which are attached hereto as **Appendix 2**, for filing and resolving omnibus objections to claims asserted against the Reorganized Debtors in the Chapter 11 Cases (the "**Objection Procedures**").

Please review the response procedures for resolving the Omnibus Objection to ensure your response to the Omnibus Objection, if any, is timely and correctly filed.

RESPONSE PROCEDURES FOR RESOLVING THE OMNIBUS OBJECTION

Parties Required to File a Response. If you disagree with the Omnibus Objection filed against your Claim, you must file a Response with the Court in accordance with the Objection Procedures and appear at a hearing on the matter.

Response Contents. The Objection Procedures requires that each Response must contain the following information (at a minimum):

a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the title of the Omnibus Objection to which the Response is directed;

a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to your Claim or Proof of Claim, including the specific factual and legal bases upon which you rely in opposing the Omnibus Objection; and

the following contact information for the responding party:

the name, mailing address, telephone number, and email address of the responding claimant, or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the Reorganized Debtors' counsel should serve a reply to the Response, if any; or

the name, mailing address, telephone number, and email address of the party with authority to reconcile, settle, or resolve the Omnibus Objection on your behalf.

Notice and Service. Your Response must be filed with the Court by **April 30, 2026**, at 4:00 p.m. (prevailing Central Time) unless otherwise ordered by the Court.

Failure to Respond. **Failure to timely file a Response as set forth herein or to appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

Hearing. If a Response is timely filed that cannot be resolved, the Court will hold an initial hearing. The initial hearing will be non-evidentiary and used as a scheduling conference. **Failure to appear at the initial hearing may result in the summary disposition of the objection.**

Discovery. If any party determines that discovery is necessary in advance of a hearing on an Omnibus Objection, the party may serve notice on the affected Reorganized Debtor or claimant and its counsel of record. Failure to comply with this paragraph will not preclude a party from later seeking discovery.

ADDITIONAL INFORMATION

Questions or Information. Copies of all pleadings filed in the Chapter 11 Cases (including the Omnibus Objection) are available at no cost on the website maintained by the Reorganized Debtors' Claims and Noticing agent at <https://www.veritaglobal.net/ModivCare>. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: <https://ecf.txsb.uscourts.gov>. **Please do not contact the Court to discuss the merits of any Claim or Objection.**

RESERVATION OF RIGHTS

Nothing in the Omnibus Objection or this Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Appendix 1

Omnibus Objection

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

**REORGANIZED DEBTORS' TENTH
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.

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 “*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.

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*, (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

³ 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.⁴ 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*

⁴ “**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 Schedules⁵ (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**”).⁶

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,⁷ March 29, 2026 (*i.e.*, the date that is ninety (90) days after the occurrence of the Effective Date).⁸ 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.⁹

⁵ 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.

⁶ 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.”).

⁷ *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.”).

⁸ 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.

⁹ *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,¹⁰ 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

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.").

¹⁰ 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' Tenth 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 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

HUNTON ANDREWS KURTH LLP

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

Jason W. Harbour (Virginia Bar No. 68220)

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

jharbour@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 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

-----	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’
TENTH 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’ Tenth Omnibus Objection to Certain Claims* (the “*Objection*”)² 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

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.

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., *et al.*, : Case No. 25-90309 (ARP)
 :
 Reorganized Debtors.¹ : (Jointly Administered)
 :
 ----- X

**ORDER GRANTING REORGANIZED DEBTORS’
TENTH 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 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

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.

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

					Asserted Claim Amount	
#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Claim Amount
1	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1072	9/30/2025	General Unsecured Priority Secured Admin Priority Total	242 - - - \$ 242
2	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1050	9/30/2025	General Unsecured Priority Secured Admin Priority Total	237 - - - \$ 237
3	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1065	9/30/2025	General Unsecured Priority Secured Admin Priority Total	235 - - - \$ 235
4	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	317	9/16/2025	General Unsecured Priority Secured Admin Priority Total	232 - - - \$ 232
5	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1086	9/30/2025	General Unsecured Priority Secured Admin Priority Total	232 - - - \$ 232
6	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1123	9/30/2025	General Unsecured Priority Secured Admin Priority Total	230 - - - \$ 230
7	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	906	9/29/2025	General Unsecured Priority Secured Admin Priority Total	226 - - - \$ 226
8	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1010	9/30/2025	General Unsecured Priority Secured Admin Priority Total	220 - - - \$ 220
9	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1076	9/30/2025	General Unsecured Priority Secured Admin Priority Total	215 - - - \$ 215
10	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1066	9/30/2025	General Unsecured Priority Secured Admin Priority Total	210 - - - \$ 210

					Asserted Claim Amount	
#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Claim Amount
11	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1140	9/30/2025	General Unsecured Priority Secured Admin Priority Total	204 - - - \$ 204
12	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	878	9/29/2025	General Unsecured Priority Secured Admin Priority Total	199 - - - \$ 199
13	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	998	9/30/2025	General Unsecured Priority Secured Admin Priority Total	193 - - - \$ 193
14	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	381	9/17/2025	General Unsecured Priority Secured Admin Priority Total	185 - - - \$ 185
15	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	1143	9/30/2025	General Unsecured Priority Secured Admin Priority Total	184 - - - \$ 184
16	American Professional Ambulance	ModivCare Inc.	316	9/16/2025	General Unsecured Priority Secured Admin Priority Total	182 - - - \$ 182
17	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	752	9/24/2025	General Unsecured Priority Secured Admin Priority Total	180 - - - \$ 180
18	American Professional Ambulance	ModivCare Inc.	314	9/16/2025	General Unsecured Priority Secured Admin Priority Total	175 - - - \$ 175
19	American Professional Ambulance	ModivCare Inc.	315	9/16/2025	General Unsecured Priority Secured Admin Priority Total	111 - - - \$ 111
20	AMERICAN PROFESSIONAL AMBULANCE	ModivCare Inc.	663	9/23/2025	General Unsecured Priority Secured Admin Priority Total	83 - - - \$ 83

					Asserted Claim Amount	
#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Claim Amount
21	AmeriHealth Michigan, Inc.	ModivCare Solutions, LLC	1424	10/1/2025	General Unsecured Priority Secured Admin Priority Total	84,718 - - - \$84,718
22	AMWEST, INC., DBA AMWEST AMBULANCE	ModivCare Solutions, LLC	487	9/19/2025	General Unsecured Priority Secured Admin Priority Total	90,559 - - - \$90,559
23	Arcata-Mad River Ambulance LLC	ModivCare Inc.	1475	10/1/2025	General Unsecured Priority Secured Admin Priority Total	1,639 - - - \$1,639
24	Arch Insurance Company	ModivCare Inc.	1208	9/30/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$-
25	Arch Specialty Insurance Company	ModivCare Inc.	1202	9/30/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$-
26	Ash Rand Rescue EMS	ModivCare Inc.	1409	10/1/2025	General Unsecured Priority Secured Admin Priority Total	20,941 - - - \$20,941
27	AUCTIONIQ LLC	ModivCare Inc.	677	9/23/2025	General Unsecured Priority Secured Admin Priority Total	5,000 - - - \$5,000
28	BALENTINE AMBULANCE SERVICE INC	ModivCare Solutions, LLC	1003	9/30/2025	General Unsecured Priority Secured Admin Priority Total	893,545 - - - \$893,545
29	BARONA BAND OF MISSION INDIANS	ModivCare Inc.	1114	9/30/2025	General Unsecured Priority Secured Admin Priority Total	1,421 - - - \$1,421
30	BAY MEDIC TRANSPORTATION INC	ModivCare Solutions, LLC	1148	9/30/2025	General Unsecured Priority Secured Admin Priority Total	846,270 - - - \$846,270

					Asserted Claim Amount	
#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Claim Amount
31	BLACK & WHITE TAXI & CAB CO LLC	ModivCare Solutions, LLC	1399	10/1/2025	General Unsecured Priority Secured Admin Priority Total	1,491 - - - \$ 1,491
32	Blythe Ambulance Service	ModivCare Inc.	1491	10/1/2025	General Unsecured Priority Secured Admin Priority Total	1,870 - - - \$ 1,870
33	Broward Ambulance, Inc.	ModivCare Inc.	1495	10/1/2025	General Unsecured Priority Secured Admin Priority Total	25,267 - - - \$ 25,267
34	BrowserStack, Inc.	ModivCare Inc.	388	9/18/2025	General Unsecured Priority Secured Admin Priority Total	- 61,500 - - \$ 61,500
35	BT EXPRESS TRANSPORTATION	ModivCare Solutions, LLC	771	9/25/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -
36	BURNEY FIRE PROTECTION DISTRICT	ModivCare Inc.	1099	9/30/2025	General Unsecured Priority Secured Admin Priority Total	517 - - - \$ 517
37	Byron Kotzas & Olga Domotor ETAL PT	Care Finders Total Care LLC	411	9/17/2025	General Unsecured Priority Secured Admin Priority Total	897 - - - \$ 897
38	Caldwell County Emergency Medical Service	ModivCare Inc.	1102	9/30/2025	General Unsecured Priority Secured Admin Priority Total	18,977 - - - \$ 18,977
39	Cal-Ore Life Flight LLC	ModivCare Inc.	784	9/25/2025	General Unsecured Priority Secured Admin Priority Total	3,613 - - - \$ 3,613
40	CALSTAR Air Medical Services LLC	ModivCare Inc.	754	9/24/2025	General Unsecured Priority Secured Admin Priority Total	25,758 - - - \$ 25,758

						Asserted Claim Amount	
#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Claim Amount	
41	Canon Financial Services, Inc.	ModivCare Inc.	1128	9/30/2025	General Unsecured Priority Secured Admin Priority Total	42,790 - - - \$42,790	
42	Canon Financial Services, Inc.	ModivCare Inc.	1129	9/30/2025	General Unsecured Priority Secured Admin Priority Total	24,839 - - - \$24,839	
43	Cape County Private Ambulance Service	ModivCare Inc.	1665	10/1/2025	General Unsecured Priority Secured Admin Priority Total	11,373 - - - \$11,373	
44	Chariton County Ambulance District	ModivCare Inc.	1024	9/29/2025	General Unsecured Priority Secured Admin Priority Total	4,661 - - - \$4,661	
45	Charleston, RDH Charities	ModivCare Solutions, LLC	437	9/18/2025	General Unsecured Priority Secured Admin Priority Total	12,395 - - - 32,227 \$44,622	
46	CITATION INVESTMENTS INC	Panhandle Support Services, Inc.	129	9/10/2025	General Unsecured Priority Secured Admin Priority Total	- 1,400 - - \$1,400	
47	City Ambulance of Eureka, Inc.	ModivCare Inc.	1477	10/1/2025	General Unsecured Priority Secured Admin Priority Total	4,348 - - - \$4,348	
48	CITY OF ALAMEDA FIRE DEPARTMENT	ModivCare Inc.	1450	10/1/2025	General Unsecured Priority Secured Admin Priority Total	5,150 - - - \$5,150	
49	City of Alhambra Fire Department Paramedics	ModivCare Inc.	1461	10/1/2025	General Unsecured Priority Secured Admin Priority Total	53,458 - - - \$53,458	
50	CITY OF ANAHEIM FIRE AND RESCUE	ModivCare Inc.	1382	10/1/2025	General Unsecured Priority Secured Admin Priority Total	20,325 - - - \$20,325	

					Asserted Claim Amount	
#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Claim Amount
51	CITY OF ARCADIA EMERGENCY AMBULANCE	ModivCare Inc.	1456	10/1/2025	General Unsecured Priority Secured Admin Priority Total	24,235 - - - \$ 24,235
52	CITY OF AVALON	ModivCare Inc.	1107	9/30/2025	General Unsecured Priority Secured Admin Priority Total	5,994 - - - \$ 5,994
53	CITY OF BERKELEY AMBULANCE	ModivCare Inc.	1446	10/1/2025	General Unsecured Priority Secured Admin Priority Total	2,610 - - - \$ 2,610
54	CITY OF BREA AMBULANCE BILLING	ModivCare Inc.	1103	9/30/2025	General Unsecured Priority Secured Admin Priority Total	4,671 - - - \$ 4,671
55	City of Calxico Fire Department EMS Division	ModivCare Inc.	1466	10/1/2025	General Unsecured Priority Secured Admin Priority Total	282,039 - - - \$ 282,039
56	CITY OF CARLSBAD FIRE DEPARTMENT	ModivCare Inc.	1371	10/1/2025	General Unsecured Priority Secured Admin Priority Total	5,499 - - - \$ 5,499
57	CITY OF CATHEDRAL CITY FIRE DEPARTMENT	ModivCare Inc.	1419	10/1/2025	General Unsecured Priority Secured Admin Priority Total	5,499 - - - \$ 5,499
58	CITY OF CHARLESTON	ModivCare Solutions, LLC	2022	10/27/2025	General Unsecured Priority Secured Admin Priority Total	110,685 116,290 - - \$ 226,976
59	City of Chula Vista	ModivCare Inc.	1444	10/1/2025	General Unsecured Priority Secured Admin Priority Total	44,419 - - - \$ 44,419
60	CITY OF CORONADO FIRE DEPARTMENT	ModivCare Inc.	1434	10/1/2025	General Unsecured Priority Secured Admin Priority Total	1,101 - - - \$ 1,101

#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Asserted Claim Amount	
						Claim Amount	Claim Amount
61	CITY OF COSTA MESA FIRE DEPARTMENT	ModivCare Inc.	1524	10/1/2025	General Unsecured Priority Secured Admin Priority Total	3,212 - - - \$3,212	3,212
62	CITY OF DOWNEY	ModivCare Inc.	1528	10/1/2025	General Unsecured Priority Secured Admin Priority Total	51,099 - - - \$51,099	51,099
63	CITY OF EL SEGUNDO FIRE DEPARTMENT	ModivCare Inc.	1452	10/1/2025	General Unsecured Priority Secured Admin Priority Total	3,563 - - - \$3,563	3,563
64	CITY OF ESCONDIDO	ModivCare Inc.	1374	10/1/2025	General Unsecured Priority Secured Admin Priority Total	15,083 - - - \$15,083	15,083
65	City of Folsom Fire Department Ambulance Svc	ModivCare Inc.	1481	10/1/2025	General Unsecured Priority Secured Admin Priority Total	21,984 - - - \$21,984	21,984
66	CITY OF FOUNTAIN VALLEY	ModivCare Inc.	1449	10/1/2025	General Unsecured Priority Secured Admin Priority Total	1,106 - - - \$1,106	1,106
67	CITY OF FULLERTON	ModivCare Inc.	1402	10/1/2025	General Unsecured Priority Secured Admin Priority Total	9,414 - - - \$9,414	9,414
68	CITY OF HUNTINGTON BEACH	ModivCare Inc.	1404	10/1/2025	General Unsecured Priority Secured Admin Priority Total	3,004 - - - \$3,004	3,004
69	CITY OF LA VERNE FIRE DEPARTMENT	ModivCare Inc.	1380	10/1/2025	General Unsecured Priority Secured Admin Priority Total	26,942 - - - \$26,942	26,942
70	CITY OF LAGUNA BEACH	ModivCare Inc.	1073	9/30/2025	General Unsecured Priority Secured Admin Priority Total	2,757 - - - \$2,757	2,757

#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Asserted Claim Amount	
						Claim Amount	
71	CITY OF MONTEREY PARK FIRE DEPARTMENT	ModivCare Inc.	1463	10/1/2025	General Unsecured Priority Secured Admin Priority Total	36,053 - - - \$ 36,053	4,120 - - - \$ 4,120
72	CITY OF OCEANSIDE AMBULANCE	ModivCare Inc.	1113	9/30/2025	General Unsecured Priority Secured Admin Priority Total	4,482 - - - \$ 4,482	3,261 - - - \$ 3,261
73	CITY OF ORANGE FIRE DEPARTMENT	ModivCare Inc.	1467	10/1/2025	General Unsecured Priority Secured Admin Priority Total	1,084 - - - \$ 1,084	3,041 - - - \$ 3,041
74	CITY OF PALM DESERT	ModivCare Inc.	1440	10/1/2025	General Unsecured Priority Secured Admin Priority Total	8,482 - - - \$ 8,482	48,778 - - - \$ 48,778
75	CITY OF PETALUMA AMBULANCE	ModivCare Inc.	1378	10/1/2025	General Unsecured Priority Secured Admin Priority Total	829,669 - - - \$ 829,669	2,292 - - - \$ 2,292
76	CITY OF POWAY	ModivCare Inc.	1453	10/1/2025	General Unsecured Priority Secured Admin Priority Total	3,041 - - - \$ 3,041	8,482 - - - \$ 8,482
77	CITY OF RIALTO AMBULANCE SERVICE	ModivCare Inc.	1539	10/1/2025	General Unsecured Priority Secured Admin Priority Total	48,778 - - - \$ 48,778	829,669 - - - \$ 829,669
78	City of Rocky Mount dba Tar River Transit	ModivCare Inc.	609	9/23/2025	General Unsecured Priority Secured Admin Priority Total	48,778 - - - \$ 48,778	829,669 - - - \$ 829,669
79	CITY OF SACRAMENTO FIRE DEPARTMENT	ModivCare Inc.	1530	10/1/2025	General Unsecured Priority Secured Admin Priority Total	829,669 - - - \$ 829,669	2,292 - - - \$ 2,292
80	CITY OF SAN CLEMENTE FIRE DEPARTMENT	ModivCare Inc.	1116	9/30/2025	General Unsecured Priority Secured Admin Priority Total	2,292 - - - \$ 2,292	829,669 - - - \$ 829,669

#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Asserted Claim Amount	
						Claim Amount	
81	CITY OF SAN GABRIEL FIRE DEPARTMENT	ModivCare Inc.	1441	10/1/2025	General Unsecured Priority Secured Admin Priority Total	20,947 - - - \$ 20,947	
82	CITY OF SAN MARINO FIRE DEPARTMENT	ModivCare Inc.	1405	10/1/2025	General Unsecured Priority Secured Admin Priority Total	3,491 - - - \$ 3,491	
83	City of San Rafael	ModivCare Inc.	1503	10/1/2025	General Unsecured Priority Secured Admin Priority Total	5,782 - - - \$ 5,782	
84	City of Santa Ana Fire	ModivCare Inc.	1509	10/1/2025	General Unsecured Priority Secured Admin Priority Total	13,425 - - - \$ 13,425	
85	CITY OF SIERRA MADRE EMS	ModivCare Inc.	1459	10/1/2025	General Unsecured Priority Secured Admin Priority Total	1,051 - - - \$ 1,051	
86	CITY OF SOUTH PASADENA FIRE DEPARTMENT	ModivCare Inc.	1497	10/1/2025	General Unsecured Priority Secured Admin Priority Total	7,871 - - - \$ 7,871	
87	City of South San Francisco	ModivCare Inc.	1549	10/1/2025	General Unsecured Priority Secured Admin Priority Total	725 - - - \$ 725	
88	CITY OF TORRANCE	ModivCare Inc.	1433	10/1/2025	General Unsecured Priority Secured Admin Priority Total	46,983 - - - \$ 46,983	
89	CITY OF VACAVILLE AMBULANCE	ModivCare Inc.	1422	10/1/2025	General Unsecured Priority Secured Admin Priority Total	1,072 - - - \$ 1,072	
90	CITY OF VISTA CALIFORNIA	ModivCare Inc.	1377	10/1/2025	General Unsecured Priority Secured Admin Priority Total	38,566 - - - \$ 38,566	

#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Asserted Claim Amount	
						Claim Amount	Claim Amount
91	CITY OF WESTMINSTER	ModivCare Inc.	1363	10/1/2025	General Unsecured Priority Secured Admin Priority Total	5,462 - - - \$5,462	
92	COGENT COMMUNICATIONS, LLC	ModivCare Inc.	817	9/26/2025	General Unsecured Priority Secured Admin Priority Total	233 - - - \$ 233	
93	Columbus County EMS Inc	ModivCare Solutions, LLC	125	9/9/2025	General Unsecured Priority Secured Admin Priority Total	6,289 - - - \$ 6,289	
94	COLUMBUS COUNTY EMS INC	ModivCare Solutions, LLC	107	9/9/2025	General Unsecured Priority Secured Admin Priority Total	621 - - - \$ 621	
95	Columbus Transport Inc	ModivCare Inc.	1637	10/1/2025	General Unsecured Priority Secured Admin Priority Total	17,944 - - - \$ 17,944	
96	Community Action Partnership of Mid-Nebraska	ModivCare Solutions, LLC	97	9/9/2025	General Unsecured Priority Secured Admin Priority Total	203 - - - \$ 203	
97	ComplianceLine, LLC dba Ethico	ModivCare Inc.	1384	10/1/2025	General Unsecured Priority Secured Admin Priority Total	2,625 - - - \$ 2,625	
98	COSTA TRANSPORTATION LLC	ModivCare Solutions, LLC	1454	10/1/2025	General Unsecured Priority Secured Admin Priority Total	6,539 - - - \$ 6,539	
99	County of Bladen dba Bladen County EMS	ModivCare Inc.	36	8/28/2025	General Unsecured Priority Secured Admin Priority Total	23,353 - - - \$ 23,353	
100	County of Stanly dba Stanly County EMS	ModivCare Solutions, LLC	163	9/10/2025	General Unsecured Priority Secured Admin Priority Total	985 - - - \$ 985	

Appendix 2

Objection Procedures

**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	

PROCEDURES FOR FILING OMNIBUS CLAIMS OBJECTIONS

1. Grounds for Omnibus Objections. In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), the Reorganized Debtors² may file omnibus objections (each, an “*Omnibus Objection*”) to Claims on the grounds that such Claims, in part or in whole:

- (a) are inconsistent with the Reorganized Debtors’ books and records;
- (b) fail to specify the asserted Claim amount (or only list the Claim amount as “unliquidated”);
- (c) seek recovery of amounts for which the Reorganized Debtors are not liable;
- (d) are incorrectly or improperly classified, including, but not limited to, any Claims listed in the Claims Register or Reorganized Debtors’ Schedules as secured claims, priority claims, or under section 503(b)(9) of the Bankruptcy Code that are to be reclassified as unsecured claims, in whole or in part;
- (e) are filed against entities that are not Reorganized Debtors or against multiple Reorganized Debtors;
- (f) fail to specify a Reorganized Debtor against which the Claim is asserted;

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.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the *Motion of Reorganized Debtors for Entry of an Order Approving Procedures for Reorganized Debtors’ Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1201] (the “*Motion*”).

- (g) are disallowed pursuant to section 502 of the Bankruptcy Code;
- (h) fail to sufficiently specify the basis for the Claim or provide sufficient supporting documentation therefor;
- (i) are disallowed pursuant to, or asserted in an amount, priority, or on terms that are otherwise inconsistent with, the Plan or the Confirmation Order;
- (j) have been withdrawn by informal written (including email) agreement between the Reorganized Debtors and the Holder, but have not yet been formally withdrawn by the Holder through the submission via U.S. mail or email of a withdrawal of claim form (the “*Withdrawal Form*”) available on the Claims and Noticing Agent’s website pursuant to the instructions written on the Withdrawal Form (in which case, a copy of the writing or email evidencing such withdrawal shall be attached to the Omnibus Objection);
- (k) have been satisfied by payment in full or in part on account of such Claim pursuant to the relief granted in the First Day Orders or any other orders of the Court;
- (l) have been satisfied by payment in full or in part on account of such Claim from a non-Debtor party, including, but not limited to, one or more of the Reorganized Debtors’ insurers (in which case the details of payments must be included with the Omnibus Objection); or
- (m) are disallowed or subordinated to all Claims senior to or equal to the asserted Claim because such Claim arises out of the rescission of the purchase or sale of a security of a Reorganized Debtor (or an affiliate of a Reorganized Debtor) pursuant to section 510(b) of the Bankruptcy Code.

2. Naming Convention for Omnibus Objections. Each Omnibus Objection will be numbered consecutively, regardless of the basis for the objection(s) contained therein.

3. Supporting Documentation. To the extent necessary for an affected Holder to be able to understand the basis of the applicable Omnibus Objection, an Omnibus Objection shall include an affidavit or declaration that provides a factual basis for the Reorganized Debtors’ objection to the Claims in such Omnibus Objection in accordance with Bankruptcy Local Rule 3007-1(a).

4. Claims Exhibits. An exhibit listing the Claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the Claims to which

there is a common basis for the objection. Claims for which there are more than one basis for the objection will be referenced on each exhibit applicable thereto. The exhibits will include, without limitation, the following information, alphabetized by Holder:

- (a) the Claims that are the subject of the Omnibus Objection and, if applicable, the Proof of Claim number related thereto from the Claims Register or the number of the Claim listed in the Schedules;
- (b) the asserted amount of the Claim;
- (c) the asserted classification of such Claim as either secured, priority unsecured, or general unsecured;
- (d) a summary of the grounds for the objection;
- (e) where the Omnibus Objection contains more than one basis for objection(s) to the subject Claims, a cross-reference to the section of the Omnibus Objection discussing such Claim; and
- (f) other information reasonably necessary for the affected Holder to understand the Reorganized Debtors' proposed treatment of the relevant Claim, including (as applicable): (i) the proposed classification of Claims the Reorganized Debtors seek to reclassify, (ii) the reduced claim amounts of Claims the Reorganized Debtors seek to reduce, or (iii) the surviving Claims or Proofs of Claim of Holders affected by the Omnibus Objection.

5. Objection Notice. Each Omnibus Objection will be accompanied by a customized objection notice, substantially in the form annexed to the order granting the Motion (the "**Order**") as Exhibit 2 (the "**Objection Notice**"), tailored, as appropriate, to address the particular Omnibus Objection, which will:

- (a) adequately describe the nature of the objection;
- (b) inform Holders that their rights may be affected by the objection;
- (c) describe the procedures for filing a written response (each, a "**Response**") to the objection, including all relevant dates and deadlines related thereto;
- (d) identify the hearing date, if applicable, and related information; and
- (e) describe how copies of Proofs of Claim, the Omnibus Objection, and other pleadings filed in the Chapter 11 Cases may be obtained.

6. Notice and Service. Each Omnibus Objection will be filed with the Court and served electronically using the Court's electronic filing system. Each Omnibus Objection (along with a copy of the Objection Notice) will be served on each Holder of a Claim that is subject to such objection by email, where available, and first-class mail where email is not available.

7. No Hearing Required for Unopposed Omnibus Objections. Omnibus Objections may be filed without a hearing date. For Claims subject to an Omnibus Objection and for which either (a) no Response is filed in accordance with the proposed response procedures, or (b) a Response is filed in accordance with the proposed response procedures, but such Response is resolved, the Reorganized Debtors may file a certificate of no objection or certificate of counsel pursuant to the Complex Case Procedures, and the Court may enter an order sustaining the Omnibus Objection with respect to such Claims without a hearing. If a Response is filed in connection with an Omnibus Objection that cannot be resolved, the Reorganized Debtors shall schedule a hearing for such Omnibus Objection with respect to the contested Claim(s).

8. Omnibus Claims Objection Hearings. If a hearing is set for an Omnibus Objection, such hearing shall be set no less than 30 days after service of the Omnibus Objection, unless otherwise ordered by the Court. In the Reorganized Debtors' sole discretion, and after notice to the affected Holder(s), the Reorganized Debtors may (without further order of the Court) adjourn the hearing on the Omnibus Objection to a subsequent hearing date by filing a notice or statement on the record. For Claims subject to an Omnibus Objection and for which either a) no Response is filed in accordance with the response procedures set forth herein (the "**Response Procedures**") and no appearance is made at the hearing or (b) a Response is filed in accordance with the Response Procedures but such Response is resolved prior to the hearing, the Reorganized Debtors may request at the hearing that the Court enter an order sustaining the Omnibus Objection with respect

to such Claims. Contested Claims for which a Response is filed in accordance with the Response Procedures, but such Response is not resolved prior to the hearing and an appearance is made at the hearing may be heard at the hearing or adjourned to a subsequent hearing date in the Reorganized Debtors' sole discretion. If a subsequent hearing is determined to be necessary, the Reorganized Debtors shall file with the Court and serve on the affected Holders a notice of the hearing (the date of which shall be determined in consultation with the affected Holder(s)) or announce such adjournment on the record. Notwithstanding the foregoing, nothing herein shall prejudice the Reorganized Debtors' rights to seek entry of an order sustaining the Omnibus Objection as to any or all Claims contained therein, as applicable, pursuant to the Complex Case Procedures.

9. Contested Matter. Each Claim subject to an Omnibus Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such Claim. The Reorganized Debtors may, in their discretion and in accordance with other orders of this Court (including the Confirmation Order), and the provisions of the Bankruptcy Code and Bankruptcy Rules, settle the priority, amount, and validity of such contested Claims without any further notice to, or action, order, or approval of, the Court.

RESPONSES TO OMNIBUS OBJECTIONS

10. Parties Required to File a Response. Any party who disagrees with an objection is required to file a Response in accordance with the Response Procedures and to appear at the hearing, if one is set. If a Holder whose Claim is subject to an Omnibus Objection does not file a Response in compliance with the procedures set forth below or fails to appear at the hearing, if one is set, the Court may, in its discretion, sustain the objection with respect to such Claim without further notice to the Holder.

11. Response Contents. Each Response must contain the following (at a minimum):

- (a) a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the Omnibus Objection to which the Response is directed;
- (b) a concise statement setting forth the reasons why the Court should not grant the objection with respect to such Claim, including the factual and legal bases upon which the Holder will rely in opposing the Omnibus Objection; and
- (c) the following contact information for the responding party:
 - (i) the name, mailing address, telephone number, and email address of the responding Holder, or the name, mailing address, telephone number, and email address of the Holder's attorney or designated representative to whom the attorneys for the Reorganized Debtors should serve a reply to the Response, if any; or
 - (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the Holder's behalf.

12. Filing of the Response. A Response will be deemed timely only if it is filed with the Court no later than 4:00 p.m. (prevailing Central Time) on the day that is thirty (30) calendar days from the date the Omnibus Objection is served. The Response deadline shall be set forth in the Objection Notice.

13. Failure to Respond. **Failure to (a) timely file a Response as set forth herein or (b) appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected Holders will be served with such order.

14. Reply to a Response. The Reorganized Debtors shall be permitted, but not required, to file a reply to any Response prior to the initial hearing with respect to the relevant Omnibus Objection.

MISCELLANEOUS

15. Additional Information. Copies of these procedures, the Motion, the Order or any other pleadings filed in the Chapter 11 Cases are available at no cost on the website maintained by the Reorganized Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global, at <https://www.veritaglobal.net/ModivCare>. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: <https://ecf.txsb.uscourts.gov/>.

16. Reservation of Rights. Nothing in any Omnibus Objection or Objection Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Exhibit M

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

----- X
 :
 In re: : Chapter 11
 :
 MODIVCARE INC., *et al.*, : Case No. 25-90309 (ARP)
 :
 Reorganized Debtors.¹ : (Jointly Administered)
 :
 ----- X

**NOTICE OF REORGANIZED DEBTORS’
ELEVENTH OMNIBUS CLAIM OBJECTION**

This is an objection to your claim. This objection asks the Court to disallow the claim you filed in this 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.

Claimants receiving this notice (this “*Notice*”) should locate the affected claims and the name of the creditor who filed it on the exhibits attached to the Omnibus Objection (as defined below). If you do not file a response by April 30, 2026, at 4:00 p.m. (prevailing Central Time), your claim may be disallowed without a hearing.

If you timely file a response that cannot be resolved, a hearing will be scheduled.

INTRODUCTION

Why am I receiving this document? You are receiving this Notice because ModivCare Inc. and its debtor affiliates (referred to as the “*Reorganized Debtors*”) have filed the Objection attached hereto as **Appendix 1** (the “*Omnibus Objection*”) to your claim(s).²

Why is my claim being objected to? As summarized in the exhibit(s) to the Omnibus Objection, the Reorganized Debtors believe that the Proof of Claim that you filed or that was filed on your behalf is deficient because: the claim embodied in the Proof of Claim was satisfied through the Cure Amounts for applicable Designated Contract.

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.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Omnibus Objection.

Where can I find out which claim is being objected to? The appendices attached hereto contain information needed for you to search for and identify the name of the creditor who filed the disputed claim, as well as the number of the claim as it appears on the claims register maintained by the Reorganized Debtors' Claims and Noticing Agent.

What do I need to do? If you disagree with the grounds of the objection, you must file a response (each, a "**Response**") with the United States Bankruptcy Court for the Southern District of Texas (the "**Court**") and send a copy to the Reorganized Debtors' attorneys pursuant to the procedures set forth below by no later than **April 30, 2026, at 4:00 p.m. (prevailing Central Time)**.

Where can I find out more information? To obtain more information about the Omnibus Objection, you can contact counsel to the Reorganized Debtors listed below. These attorneys represent the Reorganized Debtors and cannot give you legal advice. If you are seeking advice about your legal rights, you should consult your own attorney.

How do I file a response? To respond to this objection, you will need to state in writing why you believe the Omnibus Objection should be overruled in accordance with the Objection Procedures (as defined below). Any such response will need to be filed with the Court. More information on how to file documents with the Court can be found on the Court's website at <https://www.txs.uscourts.gov> or call the clerk's office at 713-250-5500. **Please do not contact the Court to discuss the merits of your Claim or the objection. The Court cannot give you legal advice.**

When do I need to file my response? Your Response must be filed no later than **April 30, 2026, at 4:00 p.m. (prevailing Central Time)**. If you do not respond by that date, **your Claim may be disallowed and expunged without further notice to you.**

IMPORTANT INFORMATION REGARDING THE OBJECTION

Grounds for the Omnibus Objection. By the Omnibus Objection, the Reorganized Debtors are seeking to **disallow and expunge** your Claim(s) based on the grounds set forth in the Omnibus Objection.

Omnibus Objection Procedures. On February 19, 2026, the Court entered an order [Docket No. 1313] approving procedures, a copy of which are attached hereto as **Appendix 2**, for filing and resolving omnibus objections to claims asserted against the Reorganized Debtors in the Chapter 11 Cases (the "**Objection Procedures**").

Please review the response procedures for resolving the Omnibus Objection to ensure your response to the Omnibus Objection, if any, is timely and correctly filed.

RESPONSE PROCEDURES FOR RESOLVING THE OMNIBUS OBJECTION

Parties Required to File a Response. If you disagree with the Omnibus Objection filed against your Claim, you must file a Response with the Court in accordance with the Objection Procedures and appear at a hearing on the matter.

Response Contents. The Objection Procedures requires that each Response must contain the following information (at a minimum):

a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the title of the Omnibus Objection to which the Response is directed;

a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to your Claim or Proof of Claim, including the specific factual and legal bases upon which you rely in opposing the Omnibus Objection; and

the following contact information for the responding party:

the name, mailing address, telephone number, and email address of the responding claimant, or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the Reorganized Debtors' counsel should serve a reply to the Response, if any; or

the name, mailing address, telephone number, and email address of the party with authority to reconcile, settle, or resolve the Omnibus Objection on your behalf.

Notice and Service. Your Response must be filed with the Court by **April 30, 2026**, at 4:00 p.m. (prevailing Central Time) unless otherwise ordered by the Court.

Failure to Respond. **Failure to timely file a Response as set forth herein or to appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

Hearing. If a Response is timely filed that cannot be resolved, the Court will hold an initial hearing. The initial hearing will be non-evidentiary and used as a scheduling conference. **Failure to appear at the initial hearing may result in the summary disposition of the objection.**

Discovery. If any party determines that discovery is necessary in advance of a hearing on an Omnibus Objection, the party may serve notice on the affected Reorganized Debtor or claimant and its counsel of record. Failure to comply with this paragraph will not preclude a party from later seeking discovery.

ADDITIONAL INFORMATION

Questions or Information. Copies of all pleadings filed in the Chapter 11 Cases (including the Omnibus Objection) are available at no cost on the website maintained by the Reorganized Debtors' Claims and Noticing agent at <https://www.veritaglobal.net/ModivCare>. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: <https://ecf.txsb.uscourts.gov>. **Please do not contact the Court to discuss the merits of any Claim or Objection.**

RESERVATION OF RIGHTS

Nothing in the Omnibus Objection or this Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Appendix 1

Omnibus Objection

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

----- X
In re: : Chapter 11
MODIVCARE INC., *et al.*, : Case No. 25-90309 (ARP)
Reorganized Debtors.¹ : (Jointly Administered)
----- X

**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.

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 “*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.

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*, (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

³ 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.⁴ 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*

⁴ “**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 Schedules⁵ (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**”).⁶

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,⁷ March 29, 2026 (*i.e.*, the date that is ninety (90) days after the occurrence of the Effective Date).⁸ 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.⁹

⁵ 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.

⁶ 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.”).

⁷ *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.”).

⁸ 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.

⁹ *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,¹⁰ 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

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.").

¹⁰ 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 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

HUNTON ANDREWS KURTH LLP

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

Jason W. Harbour (Virginia Bar No. 68220)

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

jharbour@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 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

-----	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’
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*”)² 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

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.

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. ¹	:	(Jointly Administered)
	:	
	x	

**ORDER GRANTING REORGANIZED DEBTORS’
ELEVENTH 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 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

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.

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

					Asserted Claim Amount	
#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	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	Datavall Corporation	ModivCare Inc.	7	8/22/2025	General Unsecured Priority Secured Admin Priority Total	142,888 - - - \$ 142,888
3	Datavall 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

					Asserted Claim Amount	
#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	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

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

					Asserted Claim Amount	
#	Claimant Name	Debtor against Whom Claim was Filed	Claim No.	Filing Date of Claim	Claim Nature	Claim Amount
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

					Asserted Claim Amount	
#	Claimant Name	Debtor against Whom Claim was Filed	Claim No.	Filing Date of Claim	Claim Nature	Claim Amount
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

					Asserted Claim Amount	
#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Claim Amount
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

#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Asserted Claim Amount	
						Claim Amount	Claim Amount
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	LIL TRUCKING INC DBA MED-VAN TRANSPORT	ModivCare Inc.	87	9/9/2025	General Unsecured Priority Secured Admin Priority Total	1,211 - - - \$ 1,211	

					Asserted Claim Amount	
#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Claim Amount
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

#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Asserted Claim Amount	
						Claim Amount	Claim Amount
91	Mercy Ambulance of Evansville, Inc.	ModivCare Inc.	1512	10/1/2025	General Unsecured Priority Secured Admin Priority Total	146,940 - - - \$ 146,940	146,940 - - - \$ 146,940
92	METRO AMBULANCE SERVICES RURAL INC	ModivCare Inc.	1511	10/1/2025	General Unsecured Priority Secured Admin Priority Total	501,501 - - - \$ 501,501	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	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	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	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	3,295 - - - \$ 3,295
97	MOULTRIE COUNTY COLLECTOR	Healthcom, Inc.	769	9/25/2025	General Unsecured Priority Secured Admin Priority Total	- - 53 - \$ 53	- - 53 - \$ 53
98	NATIONAL MOBILITY ELDERCARE INC	ModivCare Inc.	140	9/10/2025	General Unsecured Priority Secured Admin Priority Total	1,065 - - - \$ 1,065	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	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	577,081 - - - \$ 577,081

Appendix 2

Objection Procedures

**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	

PROCEDURES FOR FILING OMNIBUS CLAIMS OBJECTIONS

1. Grounds for Omnibus Objections. In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), the Reorganized Debtors² may file omnibus objections (each, an “*Omnibus Objection*”) to Claims on the grounds that such Claims, in part or in whole:

- (a) are inconsistent with the Reorganized Debtors’ books and records;
- (b) fail to specify the asserted Claim amount (or only list the Claim amount as “unliquidated”);
- (c) seek recovery of amounts for which the Reorganized Debtors are not liable;
- (d) are incorrectly or improperly classified, including, but not limited to, any Claims listed in the Claims Register or Reorganized Debtors’ Schedules as secured claims, priority claims, or under section 503(b)(9) of the Bankruptcy Code that are to be reclassified as unsecured claims, in whole or in part;
- (e) are filed against entities that are not Reorganized Debtors or against multiple Reorganized Debtors;
- (f) fail to specify a Reorganized Debtor against which the Claim is asserted;

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.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the *Motion of Reorganized Debtors for Entry of an Order Approving Procedures for Reorganized Debtors’ Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1201] (the “*Motion*”).

- (g) are disallowed pursuant to section 502 of the Bankruptcy Code;
- (h) fail to sufficiently specify the basis for the Claim or provide sufficient supporting documentation therefor;
- (i) are disallowed pursuant to, or asserted in an amount, priority, or on terms that are otherwise inconsistent with, the Plan or the Confirmation Order;
- (j) have been withdrawn by informal written (including email) agreement between the Reorganized Debtors and the Holder, but have not yet been formally withdrawn by the Holder through the submission via U.S. mail or email of a withdrawal of claim form (the “*Withdrawal Form*”) available on the Claims and Noticing Agent’s website pursuant to the instructions written on the Withdrawal Form (in which case, a copy of the writing or email evidencing such withdrawal shall be attached to the Omnibus Objection);
- (k) have been satisfied by payment in full or in part on account of such Claim pursuant to the relief granted in the First Day Orders or any other orders of the Court;
- (l) have been satisfied by payment in full or in part on account of such Claim from a non-Debtor party, including, but not limited to, one or more of the Reorganized Debtors’ insurers (in which case the details of payments must be included with the Omnibus Objection); or
- (m) are disallowed or subordinated to all Claims senior to or equal to the asserted Claim because such Claim arises out of the rescission of the purchase or sale of a security of a Reorganized Debtor (or an affiliate of a Reorganized Debtor) pursuant to section 510(b) of the Bankruptcy Code.

2. Naming Convention for Omnibus Objections. Each Omnibus Objection will be numbered consecutively, regardless of the basis for the objection(s) contained therein.

3. Supporting Documentation. To the extent necessary for an affected Holder to be able to understand the basis of the applicable Omnibus Objection, an Omnibus Objection shall include an affidavit or declaration that provides a factual basis for the Reorganized Debtors’ objection to the Claims in such Omnibus Objection in accordance with Bankruptcy Local Rule 3007-1(a).

4. Claims Exhibits. An exhibit listing the Claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the Claims to which

there is a common basis for the objection. Claims for which there are more than one basis for the objection will be referenced on each exhibit applicable thereto. The exhibits will include, without limitation, the following information, alphabetized by Holder:

- (a) the Claims that are the subject of the Omnibus Objection and, if applicable, the Proof of Claim number related thereto from the Claims Register or the number of the Claim listed in the Schedules;
- (b) the asserted amount of the Claim;
- (c) the asserted classification of such Claim as either secured, priority unsecured, or general unsecured;
- (d) a summary of the grounds for the objection;
- (e) where the Omnibus Objection contains more than one basis for objection(s) to the subject Claims, a cross-reference to the section of the Omnibus Objection discussing such Claim; and
- (f) other information reasonably necessary for the affected Holder to understand the Reorganized Debtors' proposed treatment of the relevant Claim, including (as applicable): (i) the proposed classification of Claims the Reorganized Debtors seek to reclassify, (ii) the reduced claim amounts of Claims the Reorganized Debtors seek to reduce, or (iii) the surviving Claims or Proofs of Claim of Holders affected by the Omnibus Objection.

5. Objection Notice. Each Omnibus Objection will be accompanied by a customized objection notice, substantially in the form annexed to the order granting the Motion (the "**Order**") as Exhibit 2 (the "**Objection Notice**"), tailored, as appropriate, to address the particular Omnibus Objection, which will:

- (a) adequately describe the nature of the objection;
- (b) inform Holders that their rights may be affected by the objection;
- (c) describe the procedures for filing a written response (each, a "**Response**") to the objection, including all relevant dates and deadlines related thereto;
- (d) identify the hearing date, if applicable, and related information; and
- (e) describe how copies of Proofs of Claim, the Omnibus Objection, and other pleadings filed in the Chapter 11 Cases may be obtained.

6. Notice and Service. Each Omnibus Objection will be filed with the Court and served electronically using the Court's electronic filing system. Each Omnibus Objection (along with a copy of the Objection Notice) will be served on each Holder of a Claim that is subject to such objection by email, where available, and first-class mail where email is not available.

7. No Hearing Required for Unopposed Omnibus Objections. Omnibus Objections may be filed without a hearing date. For Claims subject to an Omnibus Objection and for which either (a) no Response is filed in accordance with the proposed response procedures, or (b) a Response is filed in accordance with the proposed response procedures, but such Response is resolved, the Reorganized Debtors may file a certificate of no objection or certificate of counsel pursuant to the Complex Case Procedures, and the Court may enter an order sustaining the Omnibus Objection with respect to such Claims without a hearing. If a Response is filed in connection with an Omnibus Objection that cannot be resolved, the Reorganized Debtors shall schedule a hearing for such Omnibus Objection with respect to the contested Claim(s).

8. Omnibus Claims Objection Hearings. If a hearing is set for an Omnibus Objection, such hearing shall be set no less than 30 days after service of the Omnibus Objection, unless otherwise ordered by the Court. In the Reorganized Debtors' sole discretion, and after notice to the affected Holder(s), the Reorganized Debtors may (without further order of the Court) adjourn the hearing on the Omnibus Objection to a subsequent hearing date by filing a notice or statement on the record. For Claims subject to an Omnibus Objection and for which either a) no Response is filed in accordance with the response procedures set forth herein (the "**Response Procedures**") and no appearance is made at the hearing or (b) a Response is filed in accordance with the Response Procedures but such Response is resolved prior to the hearing, the Reorganized Debtors may request at the hearing that the Court enter an order sustaining the Omnibus Objection with respect

to such Claims. Contested Claims for which a Response is filed in accordance with the Response Procedures, but such Response is not resolved prior to the hearing and an appearance is made at the hearing may be heard at the hearing or adjourned to a subsequent hearing date in the Reorganized Debtors' sole discretion. If a subsequent hearing is determined to be necessary, the Reorganized Debtors shall file with the Court and serve on the affected Holders a notice of the hearing (the date of which shall be determined in consultation with the affected Holder(s)) or announce such adjournment on the record. Notwithstanding the foregoing, nothing herein shall prejudice the Reorganized Debtors' rights to seek entry of an order sustaining the Omnibus Objection as to any or all Claims contained therein, as applicable, pursuant to the Complex Case Procedures.

9. Contested Matter. Each Claim subject to an Omnibus Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such Claim. The Reorganized Debtors may, in their discretion and in accordance with other orders of this Court (including the Confirmation Order), and the provisions of the Bankruptcy Code and Bankruptcy Rules, settle the priority, amount, and validity of such contested Claims without any further notice to, or action, order, or approval of, the Court.

RESPONSES TO OMNIBUS OBJECTIONS

10. Parties Required to File a Response. Any party who disagrees with an objection is required to file a Response in accordance with the Response Procedures and to appear at the hearing, if one is set. If a Holder whose Claim is subject to an Omnibus Objection does not file a Response in compliance with the procedures set forth below or fails to appear at the hearing, if one is set, the Court may, in its discretion, sustain the objection with respect to such Claim without further notice to the Holder.

11. Response Contents. Each Response must contain the following (at a minimum):

- (a) a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the Omnibus Objection to which the Response is directed;
- (b) a concise statement setting forth the reasons why the Court should not grant the objection with respect to such Claim, including the factual and legal bases upon which the Holder will rely in opposing the Omnibus Objection; and
- (c) the following contact information for the responding party:
 - (i) the name, mailing address, telephone number, and email address of the responding Holder, or the name, mailing address, telephone number, and email address of the Holder's attorney or designated representative to whom the attorneys for the Reorganized Debtors should serve a reply to the Response, if any; or
 - (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the Holder's behalf.

12. Filing of the Response. A Response will be deemed timely only if it is filed with the Court no later than 4:00 p.m. (prevailing Central Time) on the day that is thirty (30) calendar days from the date the Omnibus Objection is served. The Response deadline shall be set forth in the Objection Notice.

13. Failure to Respond. **Failure to (a) timely file a Response as set forth herein or (b) appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected Holders will be served with such order.

14. Reply to a Response. The Reorganized Debtors shall be permitted, but not required, to file a reply to any Response prior to the initial hearing with respect to the relevant Omnibus Objection.

MISCELLANEOUS

15. Additional Information. Copies of these procedures, the Motion, the Order or any other pleadings filed in the Chapter 11 Cases are available at no cost on the website maintained by the Reorganized Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global, at <https://www.veritaglobal.net/ModivCare>. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: <https://ecf.txsb.uscourts.gov/>.

16. Reservation of Rights. Nothing in any Omnibus Objection or Objection Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Exhibit N

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

----- X
 :
 In re: : Chapter 11
 :
 MODIVCARE INC., *et al.*, : Case No. 25-90309 (ARP)
 :
 Reorganized Debtors.¹ : (Jointly Administered)
 :
 ----- X

**NOTICE OF REORGANIZED DEBTORS’
TWELFTH OMNIBUS CLAIM OBJECTION**

This is an objection to your claim. This objection asks the Court to disallow the claim you filed in this 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.

Claimants receiving this notice (this “*Notice*”) should locate the affected claims and the name of the creditor who filed it on the exhibits attached to the Omnibus Objection (as defined below). If you do not file a response by April 30, 2026, at 4:00 p.m. (prevailing Central Time), your claim may be disallowed without a hearing.

If you timely file a response that cannot be resolved, a hearing will be scheduled.

INTRODUCTION

Why am I receiving this document? You are receiving this Notice because ModivCare Inc. and its debtor affiliates (referred to as the “*Reorganized Debtors*”) have filed the Objection attached hereto as **Appendix 1** (the “*Omnibus Objection*”) to your claim(s).²

Why is my claim being objected to? As summarized in the exhibit(s) to the Omnibus Objection, the Reorganized Debtors believe that the Proof of Claim that you filed or that was filed on your behalf is deficient because: the claim embodied in the Proof of Claim was satisfied through the Cure Amounts for applicable Designated Contract.

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.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the Omnibus Objection.

Where can I find out which claim is being objected to? The appendices attached hereto contain information needed for you to search for and identify the name of the creditor who filed the disputed claim, as well as the number of the claim as it appears on the claims register maintained by the Reorganized Debtors' Claims and Noticing Agent.

What do I need to do? If you disagree with the grounds of the objection, you must file a response (each, a "**Response**") with the United States Bankruptcy Court for the Southern District of Texas (the "**Court**") and send a copy to the Reorganized Debtors' attorneys pursuant to the procedures set forth below by no later than **April 30, 2026, at 4:00 p.m. (prevailing Central Time)**.

Where can I find out more information? To obtain more information about the Omnibus Objection, you can contact counsel to the Reorganized Debtors listed below. These attorneys represent the Reorganized Debtors and cannot give you legal advice. If you are seeking advice about your legal rights, you should consult your own attorney.

How do I file a response? To respond to this objection, you will need to state in writing why you believe the Omnibus Objection should be overruled in accordance with the Objection Procedures (as defined below). Any such response will need to be filed with the Court. More information on how to file documents with the Court can be found on the Court's website at <https://www.txs.uscourts.gov> or call the clerk's office at 713-250-5500. **Please do not contact the Court to discuss the merits of your Claim or the objection. The Court cannot give you legal advice.**

When do I need to file my response? Your Response must be filed no later than **April 30, 2026, at 4:00 p.m. (prevailing Central Time)**. If you do not respond by that date, **your Claim may be disallowed and expunged without further notice to you.**

IMPORTANT INFORMATION REGARDING THE OBJECTION

Grounds for the Omnibus Objection. By the Omnibus Objection, the Reorganized Debtors are seeking to **disallow and expunge** your Claim(s) based on the grounds set forth in the Omnibus Objection.

Omnibus Objection Procedures. On February 19, 2026, the Court entered an order [Docket No. 1313] approving procedures, a copy of which are attached hereto as **Appendix 2**, for filing and resolving omnibus objections to claims asserted against the Reorganized Debtors in the Chapter 11 Cases (the "**Objection Procedures**").

Please review the response procedures for resolving the Omnibus Objection to ensure your response to the Omnibus Objection, if any, is timely and correctly filed.

RESPONSE PROCEDURES FOR RESOLVING THE OMNIBUS OBJECTION

Parties Required to File a Response. If you disagree with the Omnibus Objection filed against your Claim, you must file a Response with the Court in accordance with the Objection Procedures and appear at a hearing on the matter.

Response Contents. The Objection Procedures requires that each Response must contain the following information (at a minimum):

a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the title of the Omnibus Objection to which the Response is directed;

a concise statement setting forth the reasons why the Court should not grant the Omnibus Objection with respect to your Claim or Proof of Claim, including the specific factual and legal bases upon which you rely in opposing the Omnibus Objection; and

the following contact information for the responding party:

the name, mailing address, telephone number, and email address of the responding claimant, or the name, address, telephone number, and email address of the claimant's attorney or designated representative to whom the Reorganized Debtors' counsel should serve a reply to the Response, if any; or

the name, mailing address, telephone number, and email address of the party with authority to reconcile, settle, or resolve the Omnibus Objection on your behalf.

Notice and Service. Your Response must be filed with the Court by **April 30, 2026**, at 4:00 p.m. (prevailing Central Time) unless otherwise ordered by the Court.

Failure to Respond. **Failure to timely file a Response as set forth herein or to appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected creditors will be served with such order.

Hearing. If a Response is timely filed that cannot be resolved, the Court will hold an initial hearing. The initial hearing will be non-evidentiary and used as a scheduling conference. **Failure to appear at the initial hearing may result in the summary disposition of the objection.**

Discovery. If any party determines that discovery is necessary in advance of a hearing on an Omnibus Objection, the party may serve notice on the affected Reorganized Debtor or claimant and its counsel of record. Failure to comply with this paragraph will not preclude a party from later seeking discovery.

ADDITIONAL INFORMATION

Questions or Information. Copies of all pleadings filed in the Chapter 11 Cases (including the Omnibus Objection) are available at no cost on the website maintained by the Reorganized Debtors' Claims and Noticing agent at <https://www.veritaglobal.net/ModivCare>. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: <https://ecf.txsb.uscourts.gov>. **Please do not contact the Court to discuss the merits of any Claim or Objection.**

RESERVATION OF RIGHTS

Nothing in the Omnibus Objection or this Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.

Appendix 1

Omnibus Objection

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

----- X
 :
 In re: : Chapter 11
 :
 MODIVCARE INC., *et al.*, : Case No. 25-90309 (ARP)
 :
 Reorganized Debtors.¹ : (Jointly Administered)
 :
 ----- X

**REORGANIZED DEBTORS' TWELFTH
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.

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 “*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.

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*, (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

³ 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.⁴ 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*

⁴ “**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 Schedules⁵ (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**”).⁶

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,⁷ March 29, 2026 (*i.e.*, the date that is ninety (90) days after the occurrence of the Effective Date).⁸ 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.⁹

⁵ 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.

⁶ 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.”).

⁷ *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.”).

⁸ 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.

⁹ *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,¹⁰ 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

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.”).

¹⁰ 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' Twelfth 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 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

HUNTON ANDREWS KURTH LLP

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

Jason W. Harbour (Virginia Bar No. 68220)

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

jharbour@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 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

-----	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’
TWELFTH 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’ Twelfth Omnibus Objection to Certain Claims* (the “*Objection*”)² 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

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.

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. ¹	:	(Jointly Administered)
	:	
	x	

**ORDER GRANTING REORGANIZED DEBTORS’
TWELFTH 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 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

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.

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	Claim Nature	Asserted Claim Amount	
						Claim Amount	Claim Amount
1	NORTH COUNTY FIRE PROTECTION DISTRICT	ModivCare Inc.	1406	10/1/2025	General Unsecured Priority Secured Admin Priority Total	8,259 - - \$ 8,259	
2	NORTH TAHOE FIRE DISTRICT	ModivCare Inc.	1423	10/1/2025	General Unsecured Priority Secured Admin Priority Total	619 - - \$ 619	
3	Novant Health New Hanover Regional EMS	ModivCare Inc.	1144	9/30/2025	General Unsecured Priority Secured Admin Priority Total	783,529 - - \$ 783,529	
4	Ohio Department of Job and Family Services - OLAS	HigiSH LLC	1987	10/23/2025	General Unsecured Priority Secured Admin Priority Total	20 204 - \$ 223	
5	Pafford Emergency Medical Services, Inc	ModivCare Solutions, LLC	711	9/24/2025	General Unsecured Priority Secured Admin Priority Total	438,968 - - \$ 438,968	
6	Pafford EMS of Mississippi, Inc	ModivCare Solutions, LLC	755	9/24/2025	General Unsecured Priority Secured Admin Priority Total	388,985 - - \$ 388,985	
7	Paramedics Logistics Holding Company LLC	ModivCare Inc.	1657	10/1/2025	General Unsecured Priority Secured Admin Priority Total	177,775 - - \$ 177,775	
8	PAVILION UNIT ACQUISITION LP	Arsens Home Care, Inc.	489	9/17/2025	General Unsecured Priority Secured Admin Priority Total	2,015 - - \$ 2,015	
9	Penn Valley Fire Protection District	ModivCare Inc.	1639	10/1/2025	General Unsecured Priority Secured Admin Priority Total	1,804 - - \$ 1,804	
10	PHI Health LLC DBA PHI Air Medical	ModivCare Inc.	1206	9/30/2025	General Unsecured Priority Secured Admin Priority Total	112,373 - - \$ 112,373	

#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Asserted Claim Amount	
						Claim Amount	Claim Amount
11	Physicians Surgeons Ambulance Service, Inc.	ModivCare Inc.	1513	10/1/2025	General Unsecured Priority Secured Admin Priority Total	20,796 - - - \$ 20,796	
12	PIEDMONT REGIONAL COMMUNITY SERVICES	ModivCare Solutions, LLC	830	9/26/2025	General Unsecured Priority Secured Admin Priority Total	1,880 - - - \$ 1,880	
13	Prodigy Resources LLC	ModivCare Inc.	431	9/18/2025	General Unsecured Priority Secured Admin Priority Total	140,895 - - - \$ 140,895	
14	Propio LS LLC	ModivCare Inc.	70	9/8/2025	General Unsecured Priority Secured Admin Priority Total	138,962 - - - \$ 138,962	
15	Propio LS LLC	VRI Intermediate Holdings, LLC	69	9/8/2025	General Unsecured Priority Secured Admin Priority Total	3,008 - - - \$ 3,008	
16	Propio LS LLC	All Metro Health Care Services, Inc.	77	9/8/2025	General Unsecured Priority Secured Admin Priority Total	163 - - - \$ 163	
17	Propio LS LLC	Higl Care, LLC	72	9/8/2025	General Unsecured Priority Secured Admin Priority Total	152 - - - \$ 152	
18	Propio LS LLC	Caregivers America, LLC.	71	9/8/2025	General Unsecured Priority Secured Admin Priority Total	40 - - - \$ 40	
19	Propio LS LLC	Multicultural Home Care Inc.	73	9/8/2025	General Unsecured Priority Secured Admin Priority Total	16 - - - \$ 16	
20	Propio LS LLC	Care Finders Total Care LLC	74	9/8/2025	General Unsecured Priority Secured Admin Priority Total	16 - - - \$ 16	

#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Asserted Claim Amount	
						Claim Amount	Claim Amount
21	ProTransport-1 LLC	ModivCare Inc.	789	9/25/2025	General Unsecured Priority Secured Admin Priority Total	702,017 - - - \$ 702,017	5,952 - - - \$ 5,952
22	PROVIDENCE TRANSPORTATION INC	ModivCare Inc.	1656	10/1/2025	General Unsecured Priority Secured Admin Priority Total	233,274 - - - \$ 233,274	1,745,268 - - - \$ 1,745,268
23	QUALTRICS LLC	ModivCare Inc.	196	9/15/2025	General Unsecured Priority Secured Admin Priority Total	233,517 - - - \$ 233,517	28,960 - - - \$ 28,960
24	Randstad US	ModivCare Inc.	354	9/16/2025	General Unsecured Priority Secured Admin Priority Total	233,517 - - - \$ 233,517	200 9,800 - - \$ 10,000
25	REACH Air Medical Services LLC	ModivCare Inc.	783	9/25/2025	General Unsecured Priority Secured Admin Priority Total	28,960 - - - \$ 28,960	47,484 - - - \$ 47,484
26	REGIONAL EMERGENCY MEDICAL SERVICES AUTH	ModivCare Inc.	753	9/24/2025	General Unsecured Priority Secured Admin Priority Total	28,960 - - - \$ 28,960	3,651 - - - \$ 3,651
27	RELIABLE HANDS TRANSPORTATION LLC	ModivCare Inc.	1074	9/30/2025	General Unsecured Priority Secured Admin Priority Total	200 9,800 - - \$ 10,000	47,484 - - - \$ 47,484
28	RENO CAB COMPANY INC	ModivCare Solutions, LLC	842	9/26/2025	General Unsecured Priority Secured Admin Priority Total	47,484 - - - \$ 47,484	11,250 - - - \$ 11,250
29	Renova Technology Incorporated	Higi SH LLC	509	9/21/2025	General Unsecured Priority Secured Admin Priority Total	3,651 - - - \$ 3,651	11,250 - - - \$ 11,250
30	REVIEWED COSTS INC	ModivCare Inc.	84	9/9/2025	General Unsecured Priority Secured Admin Priority Total	11,250 - - - \$ 11,250	

#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Asserted Claim Amount	
						Claim Amount	Claim Amount
31	RICHMOND AMBULANCE AUTHORITY	ModivCare Inc.	1133	9/30/2025	General Unsecured	823,994	-
					Priority	-	-
					Secured	-	-
					Admin Priority	-	-
					Total	\$ 823,994	
32	RIDGE AMBULANCE SERVICE INC	ModivCare Solutions, LLC	1095	9/30/2025	General Unsecured	16,828	-
					Priority	-	-
					Secured	-	-
					Admin Priority	-	-
					Total	\$ 16,828	
33	RITAS TRANSPORTATION SERVICE LLC	ModivCare Inc.	161	9/11/2025	General Unsecured	-	-
					Priority	-	-
					Secured	-	-
					Admin Priority	-	-
					Total	\$ -	
34	Rockingham County EMS	ModivCare Inc.	1379	10/1/2025	General Unsecured	20,559	-
					Priority	-	-
					Secured	-	-
					Admin Priority	-	-
					Total	\$ 20,559	
35	Ronald McDonald House Charities of Greater Charlotte, Inc.	ModivCare Solutions, LLC	763	9/25/2025	General Unsecured	28,669	-
					Priority	-	-
					Secured	-	-
					Admin Priority	-	-
					Total	\$ 28,669	
36	ROSS VALLEY PARAMEDIC AUTHORITY	ModivCare Inc.	1647	10/1/2025	General Unsecured	1,195	-
					Priority	-	-
					Secured	-	-
					Admin Priority	-	-
					Total	\$ 1,195	
37	ROYAL AMBULANCE INC.	ModivCare Inc.	503	9/21/2025	General Unsecured	1,096,405	-
					Priority	-	-
					Secured	-	-
					Admin Priority	-	-
					Total	\$ 1,096,405	
38	ROYALTY AMBULANCE SERVICES INC	ModivCare Inc.	990	9/29/2025	General Unsecured	121,252	-
					Priority	-	-
					Secured	-	-
					Admin Priority	-	-
					Total	\$ 121,252	
39	Rural/Metro of California, Inc.	ModivCare Inc.	1527	10/1/2025	General Unsecured	16,813	-
					Priority	-	-
					Secured	-	-
					Admin Priority	-	-
					Total	\$ 16,813	
40	Rural/Metro of Southern Ohio, Inc.	ModivCare Inc.	1536	10/1/2025	General Unsecured	382,763	-
					Priority	-	-
					Secured	-	-
					Admin Priority	-	-
					Total	\$ 382,763	

#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Asserted Claim Amount	
						Claim Amount	Claim Amount
41	Rutherford County EMS	ModivCare Inc.	1368	10/11/2025	General Unsecured	37,781	-
					Priority	-	-
					Secured	-	-
					Admin Priority	-	-
					Total	\$ 37,781	-
42	SACRAMENTO METROPOLITAN FIRE DISTRICT	ModivCare Inc.	1428	10/11/2025	General Unsecured	864,998	-
					Priority	-	-
					Secured	-	-
					Admin Priority	-	-
					Total	\$ 864,998	-
43	SACRED HEART HEALTH SERVICES	ModivCare Inc.	376	9/17/2025	General Unsecured	5,926	-
					Priority	-	-
					Secured	-	-
					Admin Priority	-	-
					Total	\$ 5,926	-
44	SAN LUIS AMBULANCE SERVICE, INC.	ModivCare Inc.	536	9/19/2025	General Unsecured	70,777	-
					Priority	-	-
					Secured	-	-
					Admin Priority	-	-
					Total	\$ 70,777	-
45	SAN RAMON VALLEY FIRE DEPARTMENT	ModivCare Inc.	1069	9/30/2025	General Unsecured	1,719	-
					Priority	-	-
					Secured	-	-
					Admin Priority	-	-
					Total	\$ 1,719	-
46	Scotland County Ambulance District	ModivCare Inc.	985	9/29/2025	General Unsecured	10,833	-
					Priority	-	-
					Secured	-	-
					Admin Priority	-	-
					Total	\$ 10,833	-
47	SHEN PACO INDUSTRIES INC	ModivCare Solutions, LLC	676	9/23/2025	General Unsecured	6,064	-
					Priority	-	-
					Secured	-	-
					Admin Priority	-	-
					Total	\$ 6,064	-
48	SIERRA AMBULANCE SERVICE, INC	ModivCare Solutions, LLC	1106	9/30/2025	General Unsecured	142,806	-
					Priority	-	-
					Secured	-	-
					Admin Priority	-	-
					Total	\$ 142,806	-
49	Softserve Inc.	ModivCare Solutions, LLC	385	9/18/2025	General Unsecured	1,180,024	-
					Priority	-	-
					Secured	-	-
					Admin Priority	-	-
					Total	\$ 1,180,024	-
50	Sonoma County Fire & Rescue Auth	ModivCare Inc.	1094	9/30/2025	General Unsecured	12,424	-
					Priority	-	-
					Secured	-	-
					Admin Priority	-	-
					Total	\$ 12,424	-

#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Asserted Claim Amount	
						Claim Amount	Claim Amount
51	SOUTH LAKE COUNTY FIRE PROTECTION	ModivCare Inc.	1582	10/1/2025	General Unsecured Priority Secured Admin Priority Total	348 - - - \$ 348	348
52	SOUTH PLACER FIRE DEPARTMENT	ModivCare Inc.	1432	10/1/2025	General Unsecured Priority Secured Admin Priority Total	1,736 - - - \$ 1,736	1,736
53	South San Joaquin County Fire Authority	ModivCare Inc.	1436	10/1/2025	General Unsecured Priority Secured Admin Priority Total	61,789 - - - \$ 61,789	61,789
54	SOUTHERN MARIN EMERGENCY MEDICAL PARAMEDICS SYSTEMS	ModivCare Inc.	1520	10/1/2025	General Unsecured Priority Secured Admin Priority Total	614 - - - \$ 614	614
55	SPECIALTEE TRANSPORTATION	ModivCare Solutions, LLC	1223	9/30/2025	General Unsecured Priority Secured Admin Priority Total	16,350 - - - \$ 16,350	16,350
56	SpecialtyNeeds Transportation, Inc.	ModivCare Inc.	925	9/29/2025	General Unsecured Priority Secured Admin Priority Total	388,505 - - - \$ 388,505	388,505
57	SPRINGS AMBULANCE SERVICE INC	ModivCare Inc.	1522	10/1/2025	General Unsecured Priority Secured Admin Priority Total	35,844 - - - \$ 35,844	35,844
58	Straightway Transportation LLC	ModivCare Inc.	1645	10/1/2025	General Unsecured Priority Secured Admin Priority Total	99,245 - - - \$ 99,245	99,245
59	SUPERIOR AIR-GROUND AMBULANCE SERVICE, INC.	ModivCare Solutions, LLC	429	9/18/2025	General Unsecured Priority Secured Admin Priority Total	731,714 - - - \$ 731,714	731,714
60	Swain County EMS	ModivCare Inc.	1606	10/1/2025	General Unsecured Priority Secured Admin Priority Total	61,464 - - - \$ 61,464	61,464

#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Asserted Claim Amount	
						Claim Amount	Claim Amount
61	THE SABINE COUNCIL ON THE AGING INC	ModivCare Inc.	1400	10/1/2025	General Unsecured Priority Secured Admin Priority Total	1,529 - - - \$ 1,529	1,529
62	TLC TRANSIT LLC	ModivCare Solutions, LLC	404	9/18/2025	General Unsecured Priority Secured Admin Priority Total	3,969 - - - \$ 3,969	3,969
63	TRACE AMBULANCE, INC.	ModivCare Inc.	923	9/29/2025	General Unsecured Priority Secured Admin Priority Total	22,422 - - - \$ 22,422	22,422
64	TriCounty Ambulance Inc	ModivCare Solutions, LLC	108	9/10/2025	General Unsecured Priority Secured Admin Priority Total	17,453 - - - \$ 17,453	17,453
65	TRITEC OFFICE EQUIPMENT INC	Care Finders Total Care LLC	106	9/10/2025	General Unsecured Priority Secured Admin Priority Total	3,429 - - - \$ 3,429	3,429
66	TRUST CARE AND ASSOCIATES MEDICAL TRANSPORTATION INC	ModivCare Inc.	309	9/16/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -	-
67	TSO ICP LP	ModivCare Solutions, LLC	823	9/25/2025	General Unsecured Priority Secured Admin Priority Total	22,796 - - - \$ 22,796	22,796
68	Uber Health LLC	ModivCare Solutions, LLC	902	9/29/2025	General Unsecured Priority Secured Admin Priority Total	23,016,808 - - - \$ 23,016,808	23,016,808
69	UnitedHealthcare Insurance Company	ModivCare Solutions, LLC	1016	9/30/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -	-
70	UNIVERSAL TRANSPORTATION LLC	ModivCare Inc.	812	9/26/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$ -	-

#	Claimant Name	Debtor against Whom Claim was Filed	Clam No.	Filing Date of Claim	Claim Nature	Asserted Claim Amount	
						Claim Amount	Claim Amount
71	Victory Transports Inc	ModivCare Inc.	1286	9/30/2025	General Unsecured Priority Secured Admin Priority Total	- 9,595 - - \$9,595	- 9,595 - - \$9,595
72	Virginia Medical Transport LLC	ModivCare Inc.	1523	10/1/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$34,231	34,231 - - - \$34,231
73	VXI Global Solutions, LLC	ModivCare Solutions, LLC	486	9/19/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$1,064,556	1,064,556 - - - \$1,064,556
74	Wakefern Food Corp.	ModivCare Inc.	792	9/26/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$11,160	11,160 - - - \$11,160
75	Westmed Ambulance, Inc.	ModivCare Inc.	1515	10/1/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$361,121	361,121 - - - \$361,121
76	WHC FL LLC DBA ZTRIP	ModivCare Solutions, LLC	1411	10/1/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$7,123	7,123 - - - \$7,123
77	WHC Worldwide	ModivCare Solutions, LLC	1544	10/1/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$220,646	220,646 - - - \$220,646
78	WPENGINE INC	ModivCare Inc.	131	9/10/2025	General Unsecured Priority Secured Admin Priority Total	- - - - \$18,848	18,848 - - - \$18,848

Appendix 2

Objection Procedures

**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	

PROCEDURES FOR FILING OMNIBUS CLAIMS OBJECTIONS

1. Grounds for Omnibus Objections. In addition to those grounds expressly set forth in Bankruptcy Rule 3007(d), the Reorganized Debtors² may file omnibus objections (each, an “*Omnibus Objection*”) to Claims on the grounds that such Claims, in part or in whole:

- (a) are inconsistent with the Reorganized Debtors’ books and records;
- (b) fail to specify the asserted Claim amount (or only list the Claim amount as “unliquidated”);
- (c) seek recovery of amounts for which the Reorganized Debtors are not liable;
- (d) are incorrectly or improperly classified, including, but not limited to, any Claims listed in the Claims Register or Reorganized Debtors’ Schedules as secured claims, priority claims, or under section 503(b)(9) of the Bankruptcy Code that are to be reclassified as unsecured claims, in whole or in part;
- (e) are filed against entities that are not Reorganized Debtors or against multiple Reorganized Debtors;
- (f) fail to specify a Reorganized Debtor against which the Claim is asserted;

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.

² Capitalized terms used but not defined herein have the meanings ascribed to them in the *Motion of Reorganized Debtors for Entry of an Order Approving Procedures for Reorganized Debtors’ Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1201] (the “*Motion*”).

- (g) are disallowed pursuant to section 502 of the Bankruptcy Code;
- (h) fail to sufficiently specify the basis for the Claim or provide sufficient supporting documentation therefor;
- (i) are disallowed pursuant to, or asserted in an amount, priority, or on terms that are otherwise inconsistent with, the Plan or the Confirmation Order;
- (j) have been withdrawn by informal written (including email) agreement between the Reorganized Debtors and the Holder, but have not yet been formally withdrawn by the Holder through the submission via U.S. mail or email of a withdrawal of claim form (the “*Withdrawal Form*”) available on the Claims and Noticing Agent’s website pursuant to the instructions written on the Withdrawal Form (in which case, a copy of the writing or email evidencing such withdrawal shall be attached to the Omnibus Objection);
- (k) have been satisfied by payment in full or in part on account of such Claim pursuant to the relief granted in the First Day Orders or any other orders of the Court;
- (l) have been satisfied by payment in full or in part on account of such Claim from a non-Debtor party, including, but not limited to, one or more of the Reorganized Debtors’ insurers (in which case the details of payments must be included with the Omnibus Objection); or
- (m) are disallowed or subordinated to all Claims senior to or equal to the asserted Claim because such Claim arises out of the rescission of the purchase or sale of a security of a Reorganized Debtor (or an affiliate of a Reorganized Debtor) pursuant to section 510(b) of the Bankruptcy Code.

2. Naming Convention for Omnibus Objections. Each Omnibus Objection will be numbered consecutively, regardless of the basis for the objection(s) contained therein.

3. Supporting Documentation. To the extent necessary for an affected Holder to be able to understand the basis of the applicable Omnibus Objection, an Omnibus Objection shall include an affidavit or declaration that provides a factual basis for the Reorganized Debtors’ objection to the Claims in such Omnibus Objection in accordance with Bankruptcy Local Rule 3007-1(a).

4. Claims Exhibits. An exhibit listing the Claims that are subject to the particular Omnibus Objection will be attached thereto. Each exhibit will include only the Claims to which

there is a common basis for the objection. Claims for which there are more than one basis for the objection will be referenced on each exhibit applicable thereto. The exhibits will include, without limitation, the following information, alphabetized by Holder:

- (a) the Claims that are the subject of the Omnibus Objection and, if applicable, the Proof of Claim number related thereto from the Claims Register or the number of the Claim listed in the Schedules;
- (b) the asserted amount of the Claim;
- (c) the asserted classification of such Claim as either secured, priority unsecured, or general unsecured;
- (d) a summary of the grounds for the objection;
- (e) where the Omnibus Objection contains more than one basis for objection(s) to the subject Claims, a cross-reference to the section of the Omnibus Objection discussing such Claim; and
- (f) other information reasonably necessary for the affected Holder to understand the Reorganized Debtors' proposed treatment of the relevant Claim, including (as applicable): (i) the proposed classification of Claims the Reorganized Debtors seek to reclassify, (ii) the reduced claim amounts of Claims the Reorganized Debtors seek to reduce, or (iii) the surviving Claims or Proofs of Claim of Holders affected by the Omnibus Objection.

5. Objection Notice. Each Omnibus Objection will be accompanied by a customized objection notice, substantially in the form annexed to the order granting the Motion (the "**Order**") as Exhibit 2 (the "**Objection Notice**"), tailored, as appropriate, to address the particular Omnibus Objection, which will:

- (a) adequately describe the nature of the objection;
- (b) inform Holders that their rights may be affected by the objection;
- (c) describe the procedures for filing a written response (each, a "**Response**") to the objection, including all relevant dates and deadlines related thereto;
- (d) identify the hearing date, if applicable, and related information; and
- (e) describe how copies of Proofs of Claim, the Omnibus Objection, and other pleadings filed in the Chapter 11 Cases may be obtained.

6. Notice and Service. Each Omnibus Objection will be filed with the Court and served electronically using the Court's electronic filing system. Each Omnibus Objection (along with a copy of the Objection Notice) will be served on each Holder of a Claim that is subject to such objection by email, where available, and first-class mail where email is not available.

7. No Hearing Required for Unopposed Omnibus Objections. Omnibus Objections may be filed without a hearing date. For Claims subject to an Omnibus Objection and for which either (a) no Response is filed in accordance with the proposed response procedures, or (b) a Response is filed in accordance with the proposed response procedures, but such Response is resolved, the Reorganized Debtors may file a certificate of no objection or certificate of counsel pursuant to the Complex Case Procedures, and the Court may enter an order sustaining the Omnibus Objection with respect to such Claims without a hearing. If a Response is filed in connection with an Omnibus Objection that cannot be resolved, the Reorganized Debtors shall schedule a hearing for such Omnibus Objection with respect to the contested Claim(s).

8. Omnibus Claims Objection Hearings. If a hearing is set for an Omnibus Objection, such hearing shall be set no less than 30 days after service of the Omnibus Objection, unless otherwise ordered by the Court. In the Reorganized Debtors' sole discretion, and after notice to the affected Holder(s), the Reorganized Debtors may (without further order of the Court) adjourn the hearing on the Omnibus Objection to a subsequent hearing date by filing a notice or statement on the record. For Claims subject to an Omnibus Objection and for which either a) no Response is filed in accordance with the response procedures set forth herein (the "**Response Procedures**") and no appearance is made at the hearing or (b) a Response is filed in accordance with the Response Procedures but such Response is resolved prior to the hearing, the Reorganized Debtors may request at the hearing that the Court enter an order sustaining the Omnibus Objection with respect

to such Claims. Contested Claims for which a Response is filed in accordance with the Response Procedures, but such Response is not resolved prior to the hearing and an appearance is made at the hearing may be heard at the hearing or adjourned to a subsequent hearing date in the Reorganized Debtors' sole discretion. If a subsequent hearing is determined to be necessary, the Reorganized Debtors shall file with the Court and serve on the affected Holders a notice of the hearing (the date of which shall be determined in consultation with the affected Holder(s)) or announce such adjournment on the record. Notwithstanding the foregoing, nothing herein shall prejudice the Reorganized Debtors' rights to seek entry of an order sustaining the Omnibus Objection as to any or all Claims contained therein, as applicable, pursuant to the Complex Case Procedures.

9. Contested Matter. Each Claim subject to an Omnibus Objection and the Response thereto shall constitute a separate contested matter as contemplated by Bankruptcy Rule 9014, and any order entered by the Court will be deemed a separate order with respect to such Claim. The Reorganized Debtors may, in their discretion and in accordance with other orders of this Court (including the Confirmation Order), and the provisions of the Bankruptcy Code and Bankruptcy Rules, settle the priority, amount, and validity of such contested Claims without any further notice to, or action, order, or approval of, the Court.

RESPONSES TO OMNIBUS OBJECTIONS

10. Parties Required to File a Response. Any party who disagrees with an objection is required to file a Response in accordance with the Response Procedures and to appear at the hearing, if one is set. If a Holder whose Claim is subject to an Omnibus Objection does not file a Response in compliance with the procedures set forth below or fails to appear at the hearing, if one is set, the Court may, in its discretion, sustain the objection with respect to such Claim without further notice to the Holder.

11. Response Contents. Each Response must contain the following (at a minimum):
- (a) a caption stating the name of the Court, the name of the Reorganized Debtor(s), the case number, and the Omnibus Objection to which the Response is directed;
 - (b) a concise statement setting forth the reasons why the Court should not grant the objection with respect to such Claim, including the factual and legal bases upon which the Holder will rely in opposing the Omnibus Objection; and
 - (c) the following contact information for the responding party:
 - (i) the name, mailing address, telephone number, and email address of the responding Holder, or the name, mailing address, telephone number, and email address of the Holder's attorney or designated representative to whom the attorneys for the Reorganized Debtors should serve a reply to the Response, if any; or
 - (ii) the name, address, telephone number, and email address of the party with authority to reconcile, settle, or otherwise resolve the objection on the Holder's behalf.

12. Filing of the Response. A Response will be deemed timely only if it is filed with the Court no later than 4:00 p.m. (prevailing Central Time) on the day that is thirty (30) calendar days from the date the Omnibus Objection is served. The Response deadline shall be set forth in the Objection Notice.

13. Failure to Respond. **Failure to (a) timely file a Response as set forth herein or (b) appear at the hearing, if one is set, may result in the Court sustaining the Omnibus Objection without further notice or hearing.** Upon entry of an order sustaining an Omnibus Objection, affected Holders will be served with such order.

14. Reply to a Response. The Reorganized Debtors shall be permitted, but not required, to file a reply to any Response prior to the initial hearing with respect to the relevant Omnibus Objection.

MISCELLANEOUS

15. Additional Information. Copies of these procedures, the Motion, the Order or any other pleadings filed in the Chapter 11 Cases are available at no cost on the website maintained by the Reorganized Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global, at <https://www.veritaglobal.net/ModivCare>. You may also obtain copies of any pleadings filed in these Chapter 11 Cases for a fee via PACER at: <https://ecf.txsb.uscourts.gov/>.

16. Reservation of Rights. Nothing in any Omnibus Objection or Objection Notice shall be deemed: (a) an implication or admission as to the amount of, basis for, or validity of any claim against the Reorganized Debtors; (b) a waiver or limitation of the Reorganized Debtors' or any other party in interest's right to dispute the amount of, basis for, or validity of any claim; (c) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable non-bankruptcy law; (d) a waiver of the obligation of any party in interest to file a proof of claim; (e) an implication or admission that any particular claim is of a type specified or defined in the Omnibus Objection, or any order granting the relief requested by the Omnibus Objection; (f) a promise or requirement to pay any particular claim; (g) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law; or (h) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Reorganized Debtors' estates or the Reorganized Debtors' property.