

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

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In re:	: Chapter 11
	:
MODIVCARE INC., <i>et al.</i> ,	: Case No. 25-90309 (ARP)
	:
Reorganized Debtors. ¹	: (Jointly Administered)
	:
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**CERTIFICATE OF COUNSEL REGARDING REORGANIZED DEBTORS’ SECOND
OMNIBUS OBJECTION TO CERTAIN CLAIMS**
[Relates to Docket Nos. 1257, 1367]

Pursuant to the Procedures for Complex Cases in the Southern District of Texas (the “**Complex Case Procedures**”), the undersigned hereby certifies as follows:

1. On February 6, 2026, the Reorganized Debtors filed the *Reorganized Debtors’ Second Omnibus Objection to Certain Claims* [Docket No. 1257] (the “**Objection**”), which included a proposed order granting the Objection [Docket No. 1257-2] (the “**Proposed Order**”). The deadline for parties in interest to file a response to the Objection was March 8, 2026 (the “**Objection Deadline**”).

2. Jackson Parish Ambulance Service District (“**Claimant**”), by letter dated February 19, 2026, and filed on March 10, 2026, filed the *Response to Objection of Duplicate Claims for Jackson parish Ambulance Service District* [Docket No. 1367] (the “**Response**”).

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.



3. After reviewing the Response, the Reorganized Debtors have agreed to remove the following proofs of claim filed by Claimant from the purview of the Objection: Proofs of Claim Nos. 1194, 11967, 1217, and 1219 (the “**Subject Claims**”).

4. Accordingly, attached hereto is a revised proposed order (the “**Revised Proposed Order**”) which removes the Subject Claims from Schedule 1 thereto, and a redline comparing the Revised Proposed Order to the Proposed Order.

5. In accordance with paragraph 45 of the Complex Case Procedures, the undersigned represents to the Court that all known objections have been resolved by the form of the Revised Proposed Order.

6. Accordingly, the Debtors respectfully request that the Court enter the Revised Proposed Order attached hereto.

[Remainder of page intentionally left blank.]

Dated: April 7, 2026
Houston, Texas

Respectfully submitted,

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

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*Co-Counsel for the Debtors
and Debtors in Possession*

CERTIFICATE OF SERVICE

I certify that on April 7, 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

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Reorganized Debtors. ¹	:	(Jointly Administered)
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	x	

**ORDER GRANTING REORGANIZED DEBTORS’
SECOND OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM
[Relates to Docket No. 1257]**

Upon the objection (the “*Objection*”)² of the Reorganized Debtors seeking entry of an order (this “*Order*”) disallowing and expunging the Duplicative Claims set forth in **Schedule 1** hereto, all as more fully set forth in the Objection; and the Court having reviewed the Objection; and the Court having jurisdiction to consider the Objection and the relief requested therein in accordance with 28 U.S.C. § 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Objection and opportunity for a hearing on the Objection were appropriate under the circumstances and that no other or further notice is necessary, except as set forth in this Order; and all responses, if any, to the Objection having been withdrawn, resolved, or overruled; and upon the record herein; and upon the record herein; and after due

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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 Duplicative Claim listed on Schedule 1 is disallowed and expunged in its entirety, with the corresponding Surviving Claim remaining on the Claims Register.
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 Duplicative Claim and the Reorganized Debtors' objections to each Duplicative Claim constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each Duplicative 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 (including any Surviving Claim); (b) as a waiver of the Reorganized Debtors' rights to dispute or otherwise object to any Claim (including any Surviving 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 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

Schedule of Duplicative and Surviving Claims

Claimant	Debtor Against Whom Duplicative Claim was Filed	Debtor Against Whom Surviving Claim will be Listed	Proof of Claim Number of Duplicative Claim to be Disallowed	Filing Date of Duplicate Claim	Nature of Duplicative Claim	Amount of Duplicative Claim	Proof of Claim Number of Surviving Claim	Filing Date of Surviving Claim
Broadridge Financial Solutions	ModivCare Inc.	ModivCare Inc.	9	8/25/2025	General Unsecured Priority Secured Admin Priority Total	\$195,630.00 - - - \$195,630.00	10	8/25/2025
CPC Management, Inc. d/b/a Germantown Cab Company	ModivCare Solutions, LLC	ModivCare Solutions, LLC	1535	10/1/2025	General Unsecured Priority Secured Admin Priority Total	\$290,000.00 - - - \$ 290,000.00	1547	10/1/2025
Debra Jones	ModivCare Inc.	ModivCare Inc.	1784	10/6/2025	General Unsecured Priority Secured Admin Priority Total	\$2,000,000.00 - - - \$2,000,000.00	1926	10/15/2025

Claimant	Debtor Against Whom Duplicative Claim was Filed	Debtor Against Whom Surviving Claim will be Listed	Proof of Claim Number of Duplicative Claim to be Disallowed	Filing Date of Duplicate Claim	Nature of Duplicative Claim	Amount of Duplicative Claim	Proof of Claim Number of Surviving Claim	Filing Date of Surviving Claim
FLORIDA POWER AND LIGHT	All Metro Home Care Services of Florida, Inc.	All Metro Home Care Services of Florida, Inc.	22	8/28/2025	General Unsecured Priority Secured Admin Priority Total	\$117.98 - - - \$117.98	23	8/28/2025
Jonathan Ray Linder	ModivCare Inc.	ModivCare Inc.	796	9/18/2025	General Unsecured Priority Secured Admin Priority Total	\$1,400.00 - - - \$1,400.00	814	9/18/2025

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Reorganized Debtors. ¹	:	(Jointly Administered)
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**ORDER GRANTING REORGANIZED DEBTORS’
SECOND OMNIBUS OBJECTION TO CERTAIN PROOFS OF CLAIM
[Relates to Docket No. [1257](#)]**

Upon the objection (the “*Objection*”)² of the Reorganized Debtors seeking entry of an order (this “*Order*”) disallowing and expunging the Duplicative Claims 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;

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and after due 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.
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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 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

Schedule of Duplicative and Surviving Claims

Claimant	Debtor Against Whom Duplicative Claim was Filed	Debtor Against Whom Surviving Claim will be Listed	Proof of Claim Number of Duplicative Claim to be Disallowed	Filing Date of Duplicate Claim	Nature of Duplicative Claim	Amount of Duplicative Claim	Proof of Claim Number of Surviving Claim	Filing Date of Surviving Claim
Broadridge Financial Solutions	ModivCare Inc.	ModivCare Inc.	9	8/25/2025	General Unsecured Priority Secured Admin Priority Total	\$195,630.00 - - - \$195,630.00	10	8/25/2025
CPC Management, Inc. d/b/a Germantown Cab Company	ModivCare Solutions, LLC	ModivCare Solutions, LLC	1535	10/1/2025	General Unsecured Priority Secured Admin Priority Total	\$290,000.00 - - - \$ 290,000.00	1547	10/1/2025
Debra Jones	ModivCare Inc.	ModivCare Inc.	1784	10/6/2025	General Unsecured Priority Secured Admin Priority Total	\$2,000,000.00 - - - \$2,000,000.00	1926	10/15/2025
FLORIDA POWER AND LIGHT	All Metro Home Care Services of Florida, Inc.	All Metro Home Care Services of Florida, Inc.	22	8/28/2025	General Unsecured Priority Secured Admin Priority Total	\$117.98 - - - \$117.98	23	8/28/2025

Claimant	Debtor Against Whom Duplicative Claim was Filed	Debtor Against Whom Surviving Claim will be Listed	Proof of Claim Number of Duplicative Claim to be Disallowed	Filing Date of Duplicate Claim	Nature of Duplicative Claim	Amount of Duplicative Claim	Proof of Claim Number of Surviving Claim	Filing Date of Surviving Claim
Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	ModivCare Solutions, LLC	1194	9/30/2025	General Unsecured Priority Secured Admin Priority Total	\$670.00 - - - \$670.00	1196	9/30/2025
Jackson Parish Ambulance Service District	ModivCare Solutions, LLC	ModivCare Solutions, LLC	1217	9/30/2025	General Unsecured Priority Secured Admin Priority Total	\$1,443.00 - - - \$1,443.00	1219	9/30/2025
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Summary report:	
Litera Compare for Word 11.14.0.42 Document comparison done on 4/7/2026 9:00:40 AM	
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Intelligent Table Comparison: Active	
Original filename: ModivCare - Second Omnibus Claims Objection [filing version] (Original Proposed Order).docx	
Modified filename: ModivCare - Second Omnibus Claims Objection [filing version] (Post-Filing Revised PO).docx	
Changes:	
Add	1
Delete	0
Move From	0
Move To	0
Table Insert	0
Table Delete	10
Table moves to	0
Table moves from	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
Total Changes:	11