

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

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

**NOTICE OF FILING
PROPOSED ORDER REQUIRING THE REORGANIZED
DEBTORS TO DEPOSIT FUNDS IN ESCROW WITH THE COURT**

PLEASE TAKE NOTICE THAT on April 6, 2026, the U.S. Bankruptcy Court for the Southern District of Texas (the “Court”) held a status conference in the above-captioned chapter 11 cases (the “Status Conference”) regarding *White & Case LLP’s Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 Through December 29, 2025* [Docket No. 1290] and the *Final Fee Application of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 Through December 29, 2025* [Docket No. 1288] (collectively, the “Fee Applications”); the *Objection to Final Fee Application Filed by AlixPartners, LLP* [Docket No. 1351] and the *Objection to Final Fee Application Filed by White & Case, LLP* [Docket No. 1354] (collectively, the “Fee Objections”); and *White & Case LLP’s Reply in Support*

¹ A complete list of each of the Reorganized Debtors in these 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’ proposed 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 1100 & 1200, Denver, Colorado 80237.



of Its Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period From September 9, 2025 Through December 29, 2025 [Docket No. 1410] and the Reply of AlixPartners, LLP to Objection to Its Final Fee Application [Docket No. 1411] (collectively, the “Replies”).

PLEASE TAKE FURTHER NOTICE THAT on the record at the Status Conference, the Court directed the Reorganized Debtors to escrow the unpaid amounts sought by White & Case, LLP (“White & Case”) and AlixPartners, LLP (“AlixPartners”) in the Fee Applications in the registry of the Court and further directed the parties to submit a proposed order (the “Proposed Escrow Order”) governing such escrow of funds.

PLEASE TAKE FURTHER NOTICE THAT the parties have met and conferred regarding the Proposed Escrow Order, but have been unable to agree on a form of order as of the time of this notice.

PLEASE TAKE FURTHER NOTICE THAT on April 9, 2026, ModivCare TopCo, LLC filed *Modivcare Topco, LLC’s Emergency Motion for Reconsideration of (I) Order Bifurcating Legal and Factual Issues and (II) Order Requiring Deposit of Funds into Court Registry* [Docket No. 1427] requesting the Court to reconsider its rulings at the Status Conference.

PLEASE TAKE FURTHER NOTICE THAT a Proposed Escrow Order acceptable to White & Case and AlixPartners is attached hereto for the Court’s consideration.

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April 10, 2026
Houston, Texas

/s/ Charles R. Koster

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*Counsel for the Official Committee of Unsecured
Creditors*

CERTIFICATE OF SERVICE

I certify that on April 10, 2026, I caused a copy of the foregoing document to be served via the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Charles R. Koster

Charles R. Koster

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

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

**ORDER REQUIRING THE REORGANIZED DEBTORS
TO DEPOSIT FUNDS IN ESCROW WITH THE COURT**

In connection with consideration of *White & Case LLP’s Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 Through December 29, 2025* [Docket No. 1290] (the “W&C Application”), the *Final Fee Application of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 Through December 29, 2025* [Docket No. 1288] (the “AlixPartners Application” and, together with the W&C Application, the “Applications”); and in accordance with the Court’s rulings on the record at the status conference held on April 6, 2026, it is hereby ORDERED that:

1. The Reorganized Debtors shall deposit or cause or to be deposited in the registry of the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the “Court Registry”), on or before April 14, 2026, funds sufficient to pay all unpaid amounts sought

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in the Applications, including \$628,727.58 in connection with the W&C Application and \$1,016,169.40 in connection with the AlixPartners Application.

2. The Court shall hold such funds in the Court Registry pending resolution of ModivCare Topco, LLC's objections to the Applications, and such funds shall be disbursed solely as directed by the Court in connection with the resolution of ModivCare Topco, LLC's objections to the Applications.

3. This Order shall not prevent White & Case, LLP or AlixPartners, LLP from seeking additional compensation from the Reorganized Debtors, including on account of reimbursable fees or expenses incurred after the effective date of the Reorganized Debtors' plan of reorganization.

4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

5. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated _____, 2026
Houston, Texas

Alfredo R. Pérez
United States Bankruptcy Judge