

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

United States Courts
Southern District of Texas
FILED

APR 16 2026

Nathan Ochsner, Clerk of Court

In re:
MODIVCARE INC., et al.,
Reorganized Debtors. 1

x

:

:

x

Chapter 11
Case No. 25-90309 (ARP)
(Jointly Administered)

**Concise Statement Why Court Should NOT Grant Omnibus Objection With Respect To
My Correctly & Timely Filed Claim or Proof of Claim**

FACTS

1. Proof with attached document, (separately provided with objections exhibit 1 or for the court after the herein relief page), Verita (KCC) Electronic Claim Filing Summary bottom p.4 of timely and properly submitted claim: Sep. 30, 2025.

ARGUMENT

Debtors raise only one legal issue being timeliness in their documents including titled: "AFFIDAVIT OF KENNETH SHEPARD IN SUPPORT OF REORGANIZED DEBTORS' FOURTH OMNIBUS OBJECTION TO CERTAIN CLAIMS" in which Kenneth Shepard declaration was erroneous and done in bad faith since Mark P. Donaldson did already both timely and properly file his claim via the Internet, see Facts #1, in addition to, see pdf filename exhibit 1.pdf, and for the court following document after page 2 on page 4 of the provided document.



RELIEF

Dismiss and/or overrule with prejudice Debtors Omnibus Objection with respect to Mark P. Donaldson's Claim, Proof of Claim.

Respectfully Submitted,

/s/Mark P. Donaldson (pro se)
103 Deerwood Court
Roscommon, MI 48653
E-mail: mmpd55@yahoo.com

Date: Apr. 9, 2026

PROOF OF SERVICE

I, Mark P. Donaldson, on 4-9-2026 sent this Concise Statement Why Court Should NOT Grant Omnibus Objection With Respect To My Correctly & Timely Filed Claim or Proof of Claim and Exhibit 1 as two separate pdf files to the debtor via their e-mail address that their notice was sent to me via e-mail. Also, both were sent to the Bankruptcy Court PO Box 61010 Houston, TX 77208 via USPS mail.

Sincerely,

/s/Mark P. Donaldson (pro se)
E-mail: mmpd55@yahoo.com

Date: Apr. 9, 2026

Fill in this information to identify the case:

Debtor ModivCare Inc.

United States Bankruptcy Court for the: Southern District of Texas
(State)

Case number 25-90309

Modified Official Form 410 Proof of Claim

04/25

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies or any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?	donaldson, mark <hr/> Name of the current creditor (the person or entity to be paid for this claim) Other names the creditor used with the debtor <hr/>	
2. Has this claim been acquired from someone else?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. From whom? <hr/>	
3. Where should notices and payments to the creditor be sent? Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)	Where should notices to the creditor be sent?	Where should payments to the creditor be sent? (if different)
	donaldson, mark 103 DEERWOOD CT ROSCOMMON, MI 48653-9665 Contact phone <hr/> Contact email <u>mmpd55@yahoo.com</u>	<hr/> Contact phone <hr/> Contact email <hr/>
	Uniform claim identifier (if you use one): <hr/>	
4. Does this claim amend one already filed?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Claim number on court claims registry (if known) <hr/> Filed on <hr/> <div style="text-align: right; font-size: small;">MM / DD / YYYY</div>	
5. Do you know if anyone else has filed a proof of claim for this claim?	<input checked="" type="checkbox"/> No <input type="checkbox"/> Yes. Who made the earlier filing? <hr/>	



Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor? No
 Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: _____

7. How much is the claim? \$ 100.00 approximate/estimate. Does this amount include interest or other charges?
 No
 Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.
 Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).
 Limit disclosing information that is entitled to privacy, such as health care information.
denied NEMT services

9. Is all or part of the claim secured? No
 Yes. The claim is secured by a lien on property.
Nature or property:
 Real estate: If the claim is secured by the debtor's principle residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.
 Motor vehicle
 Other. Describe: _____
Basis for perfection: _____
 Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)
Value of property: \$ _____
Amount of the claim that is secured: \$ _____
Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amount should match the amount in line 7.)
Amount necessary to cure any default as of the date of the petition: \$ _____
Annual Interest Rate (when case was filed) _____ %
 Fixed
 Variable

10. Is this claim based on a lease? No
 Yes. Amount necessary to cure any default as of the date of the petition. \$ _____

11. Is this claim subject to a right of setoff? No
 Yes. Identify the property: _____



12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

No

Yes. Check all that apply:

Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

Up to \$3,800* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

Wages, salaries, or commissions (up to \$17,150*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

Amount entitled to priority

\$ _____

\$ _____

\$ _____

\$ _____

\$ _____

\$ _____

* Amounts are subject to adjustment on 4/01/28 and every 3 years after that for cases begun on or after the date of adjustment.

13. Is all or part of the claim entitled to administrative priority pursuant to 11 U.S.C. § 503(b)(9)?

No

Yes. Indicate the amount of your claim arising from the value of any goods received by the debtor within 20 days before the date of commencement of the above case, in which the goods have been sold to the Debtor in the ordinary course of such Debtor's business. Attach documentation supporting such claim.

\$ _____

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(3) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

I am the creditor.

I am the creditor's attorney or authorized agent.

I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgement that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 09/30/2025
MM / DD / YYYY

/s/Mark P. Donaldson
Signature

Print the name of the person who is completing and signing this claim:

Name Mark P. Donaldson
First name Middle name Last name

Title _____

Company _____
Identify the corporate servicer as the company if the authorized agent is a servicer.

Address _____

Contact phone _____ Email _____



Verita (KCC) ePOC Electronic Claim Filing Summary

For phone assistance: Domestic (888) 733-1521 | International (310) 751-2636

Debtor: 25-90309 - ModivCare Inc.		
District: Southern District of Texas, Houston Division		
Creditor: donaldson, mark 103 DEERWOOD CT ROSCOMMON, MI, 48653-9665 Phone: Phone 2: Fax: Email: mmpd55@yahoo.com	Has Supporting Documentation: No supporting documentation	
	Related Document Statement: NEMT claims have already been provided to Modivcare by Mr. Donaldson.	
	Has Related Claim: No	
	Related Claim Filed By:	
Filing Party: Creditor		
Other Names Used with Debtor:	Amends Claim: No	
	Acquired Claim: No	
Basis of Claim: denied NEMT services	Last 4 Digits: No	Uniform Claim Identifier:
Total Amount of Claim: 100.00 approximate/estimate	Includes Interest or Charges: No	
Has Priority Claim: No	Priority Under:	
Has Secured Claim: No	Nature of Secured Amount:	
Amount of 503(b)(9): No	Value of Property:	
Based on Lease: No	Annual Interest Rate:	
Subject to Right of Setoff: No	Arrearage Amount:	
	Basis for Perfection:	
	Amount Unsecured:	
Submitted By: Mark P. Donaldson on 30-Sep-2025 5:34:45 a.m. Pacific Time		
Title:		
Company:		