

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

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

**ADMINISTRATIVE SERVICES COOPERATIVE, INC.’S RESPONSE TO DEBTORS’  
“NOTICE OF REORGANIZED DEBTORS’ THIRD OMINBUS CLAIM OBJECTION”  
(DOC. 1383); DECLARATIONS IN SUPPORT THEREOF**

Administrative Services Cooperative, Inc. (“ASC”) hereby files this Response to the “Notice of Reorganized Debtors’ Third Omnibus Claim Objection” (“Objection”) [Doc. No. 1383]. This response is based on the facts and grounds stated below and in the accompanying Declarations of Boris Hristev (“Hristev Dec.”) and Mark T. Young (“Young Dec.”).

**BACKGROUND**

1. On August 20, 2025 (the “Petition Date”), the above-captioned debtors (collectively “Debtors”), including Debtor ModivCare Solutions, LLC (“MCS”), filed voluntary petitions for reorganization pursuant to Chapter 11. Debtors operated their businesses as debtors-in-possession pursuant to 11 U.S.C. §§1107-1108 from the Petition Date through the Effective Date of Debtors’ Confirmed Chapter 11 Plan: December 29, 2025. Since December 29, 2025, Debtors have operated their business as reorganized debtors pursuant to 11 U.S.C. §§1141-1142.

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<sup>1</sup> A complete list of each of the 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 Debtors’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Debtor ModivCare Inc.’s principal place of business and the Debtors’ service address in the Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.



2. ASC is a transportation provider. ASC entered into an agreement with MCS (then known as and/or doing business as “LogistiCare Solutions, LLC”) to provide non-emergency medical transportation services for eligible California participants under the terms of a “Transportation Agreement” (“Agreement”). (Hristev Dec. ¶2).

3. As of the Petition Date, MCS was delinquent as to pre-petition sums due under the Agreement. On November 17, 2025, ASC filed a Proof of Claim for pre-petition sums owed under the Agreement in the amount of \$142,275.44 (Claim No. 45). (Hristev Dec. ¶3).

4. After the filing of Debtor’s Chapter 11 cases, MCS continued to do business with ASC pursuant to the Agreement. MCS is delinquent on a post-petition basis for services provided by ASC post-petition, pre-confirmation in the sum of \$105,610.64. (Hristev Dec. ¶4).

5. On December 29, 2025, Debtors filed a “Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates, (II) Occurrence of Such Plan’s Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims” (the “Administrative Expense Deadline Notice”) (Doc. 1134). (Young Dec. ¶2).

6. The Administrative Expense Deadline Notice provided a bar date for administrative claims of February 5, 2026 and stated in part as follows:

“The proof of administrative claim form (the 'Proof of Administrative Claim Form') is available free of charge on the website of the Reorganized Debtors’ claims and noticing agent Kurtzman Carson Consultants, LLC (d/b/a Verita Global) (the “Claims and Noticing Agent”): <https://epoc.veritaglobal.net/TACOU.ASPX?epoc=modivcare> (the “Restructuring Website”).” (Young Dec. ¶3).

7. On January 29, 2026, ASC’s counsel communicated with counsel for MSC and its noticing agent because the “Proof of Administrative Claim Form” referenced in the Administrative Expense Deadline Notice could not be found on the website. The MCS representative, Christopher Estes, Senior RSS Consultant of Verita Global, stated as follows:

“You can submit the claim form using the electronic proof of claim Form (ePOC) on the website. We have confirmed there will not be a separate form.

There is a link to the ePOC provided on our website at the top left of the homepage. <https://www.veritaglobal.net/ModivCare>.” (Young Dec. ¶4, Ex. 1).

8. On February 4, 2026, ASC filed its Proof of Administrative Claim (Claim No. 2362) for \$105,610.84 in accordance with the instructions from Mr. Estes described above, and timely pursuant to the Administrative Expense Deadline Notice. (Young Dec. ¶5).

9. On February 12, 2026, ASC received a partial payment on such claim in the amount of \$44,363.44. On February 18, 2026, ASC received a second partial payment of \$4,367.14. Therefore, the total amount due, owing, and unpaid on ASC’s Proof of Administrative Claim is \$56,880.26. (Hristev Dec. ¶4).

### **CONCLUSION**

10. For the foregoing reasons, ASC seeks an order overruling Debtors’ objection to ASC’s Post-Petition (Administrative) Proof of Claim filed February 4, 2026 (Claim No. 2362).

Dated: April 23, 2026

**CONLEY ROSENBERG & MENDEZ P.C.**

By: /s/ Phillip J. Conley

Phillip J. Conley, Esquire

Texas Bar No. 04666200

Email: [pjc@crm-lawfirm.com](mailto:pjc@crm-lawfirm.com)

14160 Dallas Parkway, Suite 800

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- and -

**YOUNG & CHIC LLP**

By: /s/ Mark T. Young

MARK T. YOUNG (*pro hac vice application to be submitted*)

California Bar No. 89951

Email: [myoung@youngchi LLP.com](mailto:myoung@youngchi LLP.com)

25152 Springfield Court, Suite 345

Valencia, California 91355

Telephone: 661-259-9000; Facsimile: 661-554-7088

*Counsel for Creditor, ADMINISTRATIVE SERVICES  
COOPERATIVE, INC.*

**DECLARATION OF BORIS HRISTEV**

I, BORIS HRISTEV, declare as follows:

1. I am over the age of 21 years. I am the Chief Financial Officer of Administrative Services Cooperative, Inc. (“ASC”), a California nonprofit corporation. I have personal knowledge of all matters stated herein, and if called as a witness, I could and would competently testify under oath.

2. Since 2010, ASC has done business with LogistiCare Solutions, LLC, which is now known as ModivCare Solutions, LLC (“MCS”). The basis of the arrangement between ASC and MCS is a “Transportation Agreement” dated March 1, 2010. A true and correct copy of said Agreement was attached as Exhibit “1” to ASC’s Proof of Claim described in ¶3 below.

3. As of August 20, 2025, MCS was delinquent in its amounts due to ASC pursuant to the Agreement in the amount of \$142,275.44, as detailed in ASC’s Proof of Claim filed November 17, 2025 (Claim No. 45).

4. ASC continued to provide services to MCS following August 20, 2025 through November 26, 2025. As of February 4, 2026, the unpaid amount due for such services was \$105,610.84, as reflected in ASC’s Proof of Administrative Claim filed February 4, 2026. On February 12, 2026, ASC received a partial payment on such claim in the amount of \$44,363.44. On February 18, 2026, ASC received a second partial payment of \$4,367.14. Therefore, the total amount due, owing, and unpaid on ASC’s Proof of Administrative Claim is \$56,880.26.

Executed on April 23, 2026 at Torrance, California.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

  
\_\_\_\_\_  
BORIS HRISTEV

**DECLARATION OF MARK T. YOUNG**

I, MARK T. YOUNG, declare as follows:

1. I am an attorney at law duly admitted to practice before all courts of the State of California. I am a partner of Young & Chic LLP (“Y&C”), the attorneys for Administrative Services Cooperative, Inc. (“ASC”) herein. I have personal knowledge of all matters stated herein, and if called as a witness could and would testify thereto under oath.

2. On December 29, 2025, Debtors filed a “Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates, (II) Occurrence of Such Plan’s Effective Date, and (III) Related Deadlines with Respect to Administrative Expense and Rejection Damage Claims” (the “Administrative Expense Deadline Notice”) (Doc. 1134).

3. The Administrative Expense Deadline Notice provided a bar date for administrative claims of February 5, 2026 and stated in part as follows:

“The proof of administrative claim form (the ‘Proof of Administrative Claim Form’) is available free of charge on the website of the Reorganized Debtors’ claims and noticing agent Kurtzman Carson Consultants, LLC (d/b/a Verita Global) (the ‘Claims and Noticing Agent’): <https://epoc.veritaglobal.net/TACOU.ASPX?epoc=modivcare> (the ‘Restructuring Website’).”

4. On January 29, 2026, I communicated with counsel for ModivCare Solutions, LLC (“MCS”) and its noticing agent because the “Proof of Administrative Claim Form” referenced in the Administrative Expense Deadline Notice could not be found on the website. The MCS representative, Christopher Estes, Senior RSS Consultant of Verita Global, stated as follows:

“You can submit the claim form using the electronic proof of claim Form (ePOC) on the website. We have confirmed there will not be a separate form.

There is a link to the ePOC provided on our website at the top left of the homepage. <https://www.veritaglobal.net/ModivCare>.”

Attached hereto as Exhibit "1" is a true and correct copy of my email exchange with Mr. Estes so stating.

5. On February 4, 2026, ASC filed its Proof of Administrative Claim (Claim No. 2362) in accordance with the instructions from Mr. Estes described above, and timely pursuant to the Administrative Expense Deadline Notice.

Executed on April 23, 2026 at Valencia, California.

I declare under the penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

  
\_\_\_\_\_  
MARK T. YOUNG

## Mark Young

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**From:** Christopher Estes <christopher.estes@veritaglobal.com>  
**Sent:** Thursday, January 29, 2026 3:32 PM  
**To:** Mark Young  
**Cc:** !NA Verita Call\_Center; !NA Verita ModivCare  
**Subject:** RE: URGENT ModivCare Inc. Proof of Administrative Claim Form Needed

Hello,

You can submit the claim form using the electronic proof of claim Form (ePOC)" on the website. We have confirmed there will not be a separate form.

There is a link to the ePOC provided on our website at the top left of the homepage.

<https://www.veritaglobal.net/ModivCare>

Best,

**Christopher Estes**  
Senior RSS Consultant  
Corporate Restructuring  
[cestes@veritaglobal.com](mailto:cestes@veritaglobal.com)

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**Verita**  
[veritaglobal.com](http://veritaglobal.com)

*KCC is now Verita. Please note updated contact information.*

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**From:** Mark Young <myoung@youngchicllp.com>  
**Sent:** Thursday, January 29, 2026 4:46 PM  
**To:** Christopher Estes <christopher.estes@veritaglobal.com>  
**Cc:** Erin Hester <ehester@youngchicllp.com>  
**Subject:** FW: URGENT ModivCare Inc. Proof of Administrative Claim Form Needed  
**Importance:** High

You don't often get email from [myoung@youngchicllp.com](mailto:myoung@youngchicllp.com). [Learn why this is important](#)

**I left a voicemail at 888-733-1521 re this matter at 12:42 pm.**

**From:** Mark Young  
**Sent:** Thursday, January 29, 2026 12:48 PM  
**To:** [Ray.Schrock@lw.com](mailto:Ray.Schrock@lw.com); [Keith.Simon@lw.com](mailto:Keith.Simon@lw.com); [George.Klidonas@lw.com](mailto:George.Klidonas@lw.com); [taddavidson@hunton.com](mailto:taddavidson@hunton.com); [crankin@hunton.com](mailto:crankin@hunton.com); [bell@hunton.com](mailto:bell@hunton.com); 'catherinerankin@hunton.com' <[catherinerankin@hunton.com](mailto:catherinerankin@hunton.com)>  
**Cc:** Erin Hester <[ehester@youngchicllp.com](mailto:ehester@youngchicllp.com)>  
**Subject:** URGENT ModivCare Inc. Proof of Administrative Claim Form Needed  
**Importance:** High

Counsel: My client is owed ~\$45K for post-petition services to ModivCare. The bar date for administrative claims is February 5, and the Notice filed 12/29/25 (Doc. 1134) states that

“The proof of administrative claim form (the “Proof of Administrative Claim Form”) is available free of charge on the website of the Reorganized Debtors’ claims and noticing agent Kurtzman Carson Consultants, LLC (d/b/a Verita Global) (the “Claims and Noticing Agent”):  
<https://epoc.veritaglobal.net/TACOU.ASPX?epoc=modivcare> (the “Restructuring Website”).”

I cannot find the “Proof of Administrative Claim Form” on the website (I do find a form for a regular proof of claim which states that it should not be used for an administrative claim).

**Please send me the “Proof of Administrative Claim Form,” or fix the Verita website to provide me with the correct link, by January 30, 2026.**

*Mark T. Young*

*PARTNER*

Mark T. Young | Young & Chic LLP

25152 Springfield Court, Suite 345

Valencia, CA 91355

Tel: (661) 259-9000 | Fax: (661) 554-7088



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**PROOF OF SERVICE**

In re: ModivCare, Inc. et al

Case No. 25-90309

I, the undersigned, declare as follows: I am over the age of 18 years. I am not a party to the within action. I am employed in Los Angeles County in the offices of a member of the bar licensed to practice before this court, to whose direction this service is made. My business address is 25152 Springfield Court, Suite 345, Valencia, California 91355.

On April 23, 2026, I served the foregoing document described as: **“ADMINISTRATIVE SERVICES COOPERATIVE, INC.’S RESPONSE TO DEBTORS’ ‘NOTICE OF REORGANIZED DEBTORS’ THIRD OMINBUS CLAIM OBJECTION’ (DOC. 1383); DECLARATIONS IN SUPPORT THEREOF”** on the interested parties in this action as follows:

*See attached list*

BY E-MAIL/ELECTRONIC TRANSMISSION: Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the email addresses listed below. I did not receive within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

[State] I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on April 23, 2026, at Valencia, California.

/s/: Erin Hester  
ERIN HESTER

**SERVICE LIST**

In re: ModivCare, Inc. et al  
Case No. 25-90309

<p><b><i>The Debtors</i></b> ModivCare Inc. 6900 E. Layton Avenue Suite 1100 &amp; 1200 Denver, CO 80237 Attn: Fai'sal Khan, and Chad Shandler Email: faisal.khan@modivcare.com, and chad.shandler@fticonsulting.com</p>	<p><b><i>Co-Counsel to the Debtors</i></b> Latham &amp; Watkins LLP 1271 Avenue of the Americas New York, NY 10020 Attn: Ray C. Schrock, Keith A. Simon, George Klidonas, and Jonathan Weichselbaum Email: ray.schrock@lw.com, keith.simon@lw.com, george.klidonas@lw.com, and jon.weichselbaum@lw.com</p>
<p><b><i>Co-Counsel to the Debtors</i></b> Andrews Kurth LLP 600 Travis Street, Suite 4200 Houston, TX 77002 Attn: Tad Davidson, Catherine Rankin, Brandon Bell Email: taddavidson@hunton.com crankin@hunton.com, and bbell@hunton.com</p>	<p><b><i>Proposed Counsel to the Creditors Committee</i></b> White &amp; Case LLP, 609 Main Street, Suite 2900, Houston, TX 77002, Attn: Charles Koster Email: charles.koster@whitecase.com -and- White &amp; Case LLP, 111 South Wacker Drive, Suite 5100, Chicago, IL 60606, Attn: Gregory Pesce Email: gregory.pesce@whitecase.com -and- White &amp; Case LLP, 1221 Avenue of the Americas, New York, NY 10020 Attn: Scott Greissman, and Andrew Zatz Email: sgreissman@whitecase.com, and azatz@whitecase.com</p>
<p><b><i>Counsel to the First Lien Agent, the Consenting Creditors, and the DIP Lenders</i></b> Paul Hastings LLP 200 Park Avenue New York, NY 10166 Attn: Kris Hansen, Email: krishansen@paulhastings.com</p>	<p><b><i>Office of the United States Trustee for Region 7</i></b> 515 Rusk Street, Suite 3516 Houston, TX 77002 Attn: Jana Whitworth Email: jana.whitworth@usdoj.gov</p>
<p>-and-  Paul Hastings LLP 71 South Wacker Drive, Suite 4500 Chicago, IL 60606 Attn: Matt Warren, and Lindsey Henrikson Email: mattwarren@paulhastings.com, and lindsey.henrikson@paulhastings.com</p>	