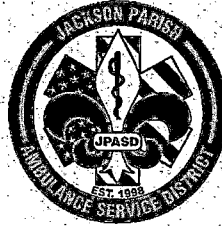


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Paula Parkerson, MD - Medical Director

Governing Board
Allen Lindsay, Conchita Doyle, Joe Vail,
Alma Williams, Deidre Hollis

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

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

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

United States Courts
Southern District of Texas
FILED

APR 24 2026

Nathan Ochsner, Clerk of Court

**RESPONSE OF JACKSON PARISH AMBULANCE SERVICE DISTRICT
TO REORGANIZED DEBTORS' ELEVENTH OMNIBUS CLAIM
OBJECTION**

Jackson Parish Ambulance Service District (the "Claimant"), by and through its authorized representative, hereby files this Response to the Reorganized Debtors' Eleventh Omnibus Claim Objection (the "Objection") and respectfully states as follows:

Jackson Parish Ambulance Service District disagrees with the Omnibus Objection filed against our claims identified as **Claim No. 1176, 1182, 1199, 1169, 1209, 1211, 1212, 1205, 1203, 1200, 1163, 1181, 1165, 1166, 1161, 1198, 1228, 1115, 1167, 1210, 1226, 1224, 1160, 1207, 1215, 1180, 1175, 1172, 1185, 1196, 1193**, in the amount of **\$61,160** for emergency medical services rendered. We are a claimant without counsel filing this response.

Jackson Parish Ambulance Service District is a governmental political sub-division special district that is an emergency medical service provider and the sole EMS provider for Jackson Parish, Louisiana.

Jackson Parish Ambulance Service District provided medically necessary treatment and ambulance transportation services to Medicaid beneficiaries for which reimbursement is due.

To the extent the Reorganized Debtors received payment for services performed by Jackson Parish Ambulance Service District, retention of such funds without payment constitutes what is believed to be unjust enrichment.



Upon information and belief, the Reorganized Debtors, or their affiliates, received payments from Medicaid managed care organizations for services rendered by Jackson Parish Ambulance Service District but failed to remit such payment to Jackson Parish Ambulance Service District.

Accordingly, the Claims represent valid, unpaid compensation for services actually rendered by Jackson Parish Ambulance Service District.

Respectfully submitted,



Jackson Parish Ambulance Service District

Aaron Johnson

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Authorized Representative for Claimant