

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

United States Courts
Southern District of Texas
FILED

April 24, 2026

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

Nathan Ochsner, Clerk of Court

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

RESPONSE TO OMNIBUS OBJECTION TO CLAIM

I, Tori McNear (formerly Tori Woodley), am responding to the Omnibus Objection filed against my claim.

The mileage reimbursement for which I am seeking payment pertains to transportation services rendered in September 2025, during which I transported my minor child to authorized medical appointments through ModivCare.

Because the services were provided after the bankruptcy filing, my claim should not be treated as a pre-petition General Unsecured Claim (“GUC”). Instead, my claim constitutes an administrative expense claim under **11 U.S.C. § 503(b)**. Under **11 U.S.C. § 503(b)**, post-petition expenses that are actual and necessary costs of preserving the estate may be allowed as administrative expenses.

I received a GUC Ballot in November 2025 reflecting my claim for \$349.74 under the name Tori Woodley as a Class 4 General Unsecured Claim holder, which confirmed that ModivCare had already recognized the debt. However, the fact that the claim was initially listed as a GUC does not change the nature of the claim itself. The claim arose after the bankruptcy filing and should be classified based on when the services were provided.

I did not receive clear notice before October 1, 2025, that a proof of claim was required to be filed by that date. The November ballot referenced a November 25, 2025, voting deadline, not an October 1, 2025, claim-filing deadline.

I filed Claim No. 2055 on November 5, 2025, and later filed Claim No. 2323 on January 28, 2026, after receiving the December 2025 notice regarding the February 5, 2026, administrative claim deadline. I reasonably relied on that notice and acted in good faith to preserve my claim.

To the extent my claim is being treated as untimely under the October 1, 2025, deadline, that deadline applies to pre-petition claims, not administrative expense claims such as mine.

Additionally, because I did not receive clear notice of the October 1, 2025, deadline before it passed and reasonably relied on the later notices provided, disallowing my claim would be



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inconsistent with due process and the principles of excusable neglect recognized in **Pioneer Investment Services Co. v. Brunswick Associates Limited Partnership, 507 U.S. 380 (1993)**.

The debt is valid and owed in the amount of approximately \$349.74. For these reasons, I respectfully request that the Court overrule the objection to my claim, allow my claim for approximately \$349.74, and properly classify it as an administrative expense claim.

Dated: April 24, 2026

A handwritten signature in black ink, appearing to read "Tori McNear". The signature is written in a cursive style with a large, sweeping initial "T" and a long, horizontal flourish at the end.

Tori McNear

(formerly Tori Woodley)

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New Electronic Document Submission

From Southern District of Texas via Southern District of Texas <admin@txs.uscourts.gov>

Date Fri 4/24/2026 9:26 PM

To Dawna Kelly <Dawna_Kelly@txs.uscourts.gov>

 1 attachment (199 KB)

Document-1-Tori McNear Woodley.pdf;

Submitted by:

Filer's Name: Tori McNear (Woodley)

Debtor's Name (if different from Filer):

Filer's Email: tkw1294@gmail.com

Filer's Phone Number: 2154078442

Case Number (if known): 25-90309

Are you filing documents for submission of a new petition:

Uploaded Document Descriptions:

Document 1 Description: Response to claim objection

Document 2 Description:

Document 3 Description:

Document 4 Description:

Document 5 Description:

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