

APR 28 2026

Nathan Ochsner, Clerk of Court

Court: UNITED STATES BANKRUPTCY COURT

SOUTHERN DISTRICT OF TEXAS

HOUSTON DIVISION

Reorganized Debtors: (Hunton Andrews Kurth LLP)

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Chapter 11: Case No. 25-90309 (ARP)/ Eileen Garcia Late Filed Claim No. 2170



REORGANIZED DEBTORS FOURTH OMNIBUS OBJECTION CLAIMS (LATE-FILED CLAIMS)

in re: Modivcare Inc ,. al.,

Response to reorganized Debtors Fourth Omnibus claim objection (RE: Claim filed by Eileen Garcia)

I, Eileen Garcia, hereby submit this response to the Reorganized Debtors Fourth Omnibus Claim objection, which seeks to disallow my claim on the basis that was not timely filed.

1. (Belief Regarding Filing Deadline)

The objection asserts that my claim was filed after the applicable bar date of October 1, However, I was led to believe that the applicable deadline for submitting my claim was December 8, and I relied on that understanding when preparing and mailing my claim.

2. (Timely Action Based on That Understanding)

In Reliance on December 8 deadline, I prepared and mailed my proof of claim on or before that date. I did not intentionally delay or disregard the court's deadline, rather, I acted in accordance with what I reasonably believed to be the correct filing date.

3. (Supporting Evidence)

I possess a United States Postal Service Mailing Receipt confirming that my claim was sent on or before what I reasonably believed was the deadline December 8. A true and correct copy of this receipt is Attached.

4. (Lack Of Prejudice and conduct)

My actions were taken based on my understanding of the deadline and without any intent to delay or disrupt the reorganized debtors. Allowing my claim would not prejudice the reorganized debtors; while disallowing it would unfairly Penalize me for a misunderstanding regarding the deadline.

WHEREFORE, I respectfully request that this Court:

1. Overrule the objection as it pertains to my claim, and
2. Grant such other and further relief as the court deems just and proper.

5. Additional Equitable Considerations Supporting Allowance of Claim

In determining whether to allow my claim, I respectfully request that the court consider the following:

- Absence of Prejudice: Allowing my claim will not materially prejudice the reorganized Debtors or Disrupt the administration of the case.
- Good Faith Conduct: My Actions were taken in good faith and based on my understanding of the applicable deadline. There was no intent to delay or disregard court procedures.
- Diligence: I acted within the timeframe I believed to be applicable and promptly mailed my claim, as evidence by the attached USPS receipt.
- Pro se Status: As a self-represented claimant, I relied on my understanding of the information available to me. Any error was the result of an unintentional misunderstanding, not neglect or indifference.

Under these circumstances, equitable considerations weigh in favor of allowing my claim to proceed.

Respectfully Submitted,

Name: Eileen Garcia

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City, State, Zip: Abiquiu N.M. 87510

Phone: 575-315-9135 / 505-900-2837

Email Address: garciak8322@gmail.com /

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Date: 4/23/26



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