

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

IN RE: §
MODIVCARE, INC. § CASE NO. 25-90309
DEBTOR §

NOTICE OF APPEAL
(Ref. ECF No. 1502)

COMES NOW, ModivCare Topco, LLC (“ModivCare”) and files this Notice of Appeal as follows:

1. Appellant is ModivCare Topco, LLC, the Reorganized Debtor in the above referenced bankruptcy case.
2. The subject of the appeal is the bankruptcy court’s *Order Requiring the Reorganized Debtors To Deposit Funds In Escrow With The Court* (ECF No. 1502) (“**Deposit Order**”).
3. A copy of the Deposit Order, dated April 30, 2026, is attached as Exhibit A.
4. This Notice of Appeal is being filed within 14 days after the entry of the Fee Order and is a timely notice of appeal.
5. The other parties to this appeal are:
 - a. *White & Case LLP*
Charles Koster
Suite 2900
609 Main St.
Houston, TX 77002
 - b. *AlixPartners, LLP*
David MacGreevey
909 Third Avenue, 28th Floor
New York, NY 10022



Dated: May 1, 2026.

Respectfully submitted,

By: /s/ Johnie Patterson
Johnie Patterson
attorney-in-charge
SBN 15601700
COUNSEL FOR MODIVCARE
TOPCO, LLC

OF COUNSEL:
WALKER & PATTERSON, P.C.
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CERTIFICATE OF SERVICE

I hereby certify that I served a true and complete copy of the foregoing Notice of Appeal was served via electronic transmission on May 1, 2026 on all parties receiving notices from the Court's CM/ECF servicing platform, as well as Charles Koster and David MacGreevey.

/s/Johnie Patterson
Johnie Patterson

ENTERED

April 30, 2026

Nathan Ochsner, Clerk

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

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

**ORDER REQUIRING THE REORGANIZED DEBTORS
TO DEPOSIT FUNDS IN ESCROW WITH THE COURT**

In connection with consideration of *White & Case LLP’s Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 Through December 29, 2025* [Docket No. 1290] (the “W&C Application”), the *Final Fee Application of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 Through December 29, 2025* [Docket No. 1288] (the “AlixPartners Application” and, together with the W&C Application, the “Applications”); and in accordance with the Court’s rulings on the record at the status conference held on April 6, 2026, it is hereby ORDERED that:

1. The Reorganized Debtors shall deposit or cause or to be deposited in the registry of the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the “Court Registry”), on or before April 14, 2026, funds sufficient to pay all unpaid amounts sought

¹ A complete list of each of the Reorganized Debtors in these chapter 11 cases and the last four digits of each Reorganized Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ proposed claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Reorganized Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these chapter 11 cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

in the Applications, including \$628,727.58 in connection with the W&C Application and \$1,016,169.40 in connection with the AlixPartners Application.


2. The Court shall hold such funds in the Court Registry pending resolution of ModivCare Topco, LLC's objections to the Applications, and such funds shall be disbursed solely as directed by the Court in connection with the resolution of ModivCare Topco, LLC's objections to the Applications.

3. This Order shall not prevent White & Case, LLP or AlixPartners, LLP from seeking additional compensation from the Reorganized Debtors, including on account of reimbursable fees or expenses incurred after the effective date of the Reorganized Debtors' plan of reorganization.

4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry. This is a final order.

5. This Court shall retain jurisdiction to hear and determine all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: April 30, 2026


Alfredo R Pérez
United States Bankruptcy Judge