

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

In re

MODIVCARE INC., et al.,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-90309 (ARP)

(Jointly Administered)

**APPLICATION OF THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF  
AN ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION  
OF WHITE & CASE LLP AS COUNSEL EFFECTIVE AS OF SEPTEMBER 9, 2025**

**If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at <https://ecf.txsb.uscourts.gov/> within twenty-one days from the date this application was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this application was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.**

The Official Committee of Unsecured Creditors (the “**Committee**”) of the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases hereby submits this application (the “**Application**”), pursuant to sections 328(a) and 1103(a) of title 11 of the United States Code (the “**Bankruptcy Code**”), rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) and rules 2014-1, 2016-1 and 9013-1

<sup>1</sup> A complete list of each of the Debtors in the 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’ proposed 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.



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of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the Southern District of Texas (the “**Local Rules**”), for the entry of an order (the “**Order**”), substantially in the form attached hereto as **Exhibit A**, authorizing the Committee to employ and retain White & Case LLP (“**White & Case**”), effective as September 9, 2025, as counsel to the Committee. In support of this Application, the Committee relies upon and incorporates by reference the *Declaration of Gregory F. Pesce in Support of Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* (the “**Pesce Declaration**”), attached hereto as **Exhibit B**, and the *Declaration of David Rowe in Support of Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* (the “**Committee Declaration**” and, together with the Pesce Declaration, the “**Declarations**”), attached hereto as **Exhibit C**. In further support of the Application, the Committee respectfully states as follows:

**RELIEF REQUESTED**

1. By this Application, pursuant to sections 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016, and Local Rules 2014-1, 2016-1, and 9013-1, the Committee seeks authority to retain and employ White & Case as its bankruptcy counsel in connection with these Chapter 11 Cases and all related matters, effective as of September 9, 2025.

**JURISDICTION, VENUE AND PREDICATES FOR RELIEF**

2. The United States Bankruptcy Court for the Southern District of Texas (the “**Court**”) has jurisdiction to consider this Application under 28 U.S.C. §§ 157 and 1334. This is a core proceeding under 28 U.S.C. § 157(b)(2)(A). Venue of these Chapter 11 Cases is proper in this district under 28 U.S.C. §§ 1408 and 1409.

3. The predicates for the relief requested by this Application are sections 328(a) and 1103(a) of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016, and Local Rules 2014-1, 2016-1, and 9013-1.

### **BACKGROUND**

4. On August 20, 2025 (the “**Petition Date**”), the Debtors filed with the Court a voluntary petition for relief under the Bankruptcy Code. The Debtors continue to operate their business and manage their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in these Chapter 11 Cases.

5. On September 5, 2025, the Office of the United States Trustee for Region 7 (the “**U.S. Trustee**”) appointed the Committee, pursuant to section 1102(a) of the Bankruptcy Code, to represent the interests of all creditors holding unsecured claims in these Chapter 11 Cases. [Docket No. 124]. As of the date hereof, the members of the Committee are: (i) Wilmington Savings Fund Society, FSB, as indenture trustee for the Unsecured Notes;<sup>2</sup> (ii) Madison Avenue International LP; (iii) Jupiter Asset Management; (iv) Uber Health, LLC; (v) MedEx Medical Transport Service, Inc.; (vi) Randstad North America; and (vii) Marquis Hines.

6. On September 9, 2025, the Committee voted to retain White & Case as its counsel, subject to Bankruptcy Court approval.

### **QUALIFICATIONS OF WHITE & CASE**

7. White & Case is proposed to serve as counsel to the Committee to perform all of the services that are necessary and appropriate to discharge the Committee’s responsibilities and

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<sup>2</sup> On August 24, 2021, Debtor ModivCare Escrow Issuer, Inc. issued \$500 million aggregate principal amount of 5.00% senior unsecured notes due October 1, 2029 (the “**Unsecured Notes**”).

further the interests of the Committee's constituents in these Chapter 11 Cases, subject to approval by the Court.

8. Since being selected, White & Case has worked closely with the Committee and its other professionals with respect to these Chapter 11 Cases. The Committee selected White & Case to serve as its counsel based in part upon the firm's extensive knowledge, experience, and expertise in representing stakeholders in chapter 11 cases, including in healthcare cases. White & Case also has extensive expertise in other fields of law that are implicated by these Chapter 11 Cases, including, among others, corporate law, commercial litigation, banking and finance law, capital markets, and tax law. Given the firm's experience and knowledge in these fields, White & Case is well qualified and uniquely able to act on the Committee's behalf in connection with these Chapter 11 Cases.

#### **SERVICES TO BE RENDERED**

9. The Committee has selected White & Case to serve as counsel to the Committee to perform all of the services that are necessary and appropriate to discharge the Committee's responsibilities and further the interests of the Committee's constituents in these Chapter 11 Cases.

10. Subject to further order of this Bankruptcy Court, White & Case will provide the following services:

- (a) advise the Committee regarding its rights, powers, and duties under the Bankruptcy Code and in connection with these Chapter 11 Cases;
- (b) assist and advise the Committee in its consultations and negotiations with the Debtors concerning the administration of these Chapter 11 Cases;
- (c) assist and advise the Committee in its examination, investigation, and analysis of the acts, conduct, assets, liabilities, and financial condition of the Debtors, including (without limitation) reviewing and investigating prepetition transactions, the operation of the Debtors' business, and the value of such business;

- (d) assist the Committee in the review, analysis, and negotiation of any chapter 11 plan(s) that have been or may be filed and assist the Committee in the review, analysis, and negotiation of the disclosure statement accompanying any chapter 11 plan(s);
- (e) take all necessary action to protect and preserve the interests of the Committee and creditors holding general unsecured claims against the Debtors' estates, including (i) the investigation and possible prosecution of actions enhancing the Debtors' estates including any potential challenges to the scopes of the prepetition security interests of the Company's first lien lenders, and (ii) review and analysis of claims filed against the Debtors' estates;
- (f) review and analyze motions, applications, orders, statements of operations, and schedules filed with the Bankruptcy Court and advise the Committee as to their propriety;
- (g) prepare on behalf of the Committee all necessary pleadings, applications, memoranda, orders, reports, and other papers, in support of positions taken by the Committee;
- (h) represent the Committee at all court hearings, statutory meetings of creditors, and other proceedings before this Court;
- (i) assist the Committee in the review, analysis, and negotiation of any financing agreements;
- (j) assist and advise the Committee as to its communications with its constituents regarding significant matters in these Chapter 11 Cases, including but not limited to, communications required under section 1102(b)(3) of the Bankruptcy Code; and
- (k) perform such other legal services as required or otherwise deemed to be in the interests of the Committee in connection with these Chapter 11 Cases.

### **PROFESSIONAL COMPENSATION**

11. White & Case has agreed to serve as counsel to the Committee and receive compensation and reimbursement in accordance with its standard billing practices for services rendered and expenses incurred on behalf of the Committee, in accordance with sections 328, 330, and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, and as otherwise ordered by the Bankruptcy Court.

12. White & Case will charge its then current standard rate for the professional services that it has provided to date and will provide in the future. Currently, the hourly rates charged by White & Case in its U.S. offices range from \$1,690 to \$2,500 for partners, \$1,630 for counsel, \$870 to \$1,580 for associates, and \$355 to \$700 for paraprofessionals. White & Case has advised the Committee that the hourly rates set forth above are subject to periodic review and adjustment in the normal course of the Firm's business, typically on January 1st of each year, and often due to the increased experience of a particular professional. Such adjustments were last made in January 2025. In the event that its billing rates increase, White & Case will provide notice of any rate increases in the fee statements in which such increased rates are in effect.

13. These hourly rates set forth above are White & Case's current standard rates and (as noted above) are subject to periodic adjustment in the ordinary course of business. These rates are set at a level designed to fairly compensate White & Case for the work of its attorneys and paraprofessionals and to cover fixed and routine overhead expenses. White & Case also charges its clients in all areas of practice for expenses incurred in connection with each client's case. The expenses charged to clients include, among other things, printing and photocopying, postage and package delivery charges, e-discovery expenses, court fees, transcript costs, travel expenses, expenses for overtime meals, and computer-aided research. White & Case will seek reimbursement, subject to the Court's approval, for all such expenses incurred by White & Case on the Committee's behalf. All requests for reimbursement of expenses will be consistent with any guidelines established by the Bankruptcy Court.

14. White & Case shall apply to this Court for allowance of compensation for professional services rendered and reimbursement of expenses in accordance with sections 330 and 331 of the Bankruptcy Code and applicable provisions of the Bankruptcy Rules, the Local

Rules, any other applicable procedures and orders of the Court, for all professional services performed and expenses incurred in these Chapter 11 Cases.

15. Pursuant to Bankruptcy Rule 2016(b), White & Case has no agreement with any other entity to share any compensation received by White & Case, except as permitted under section 504(b)(1) of the Bankruptcy Code. White & Case has not received any promises as to payment or compensation in connection with these Chapter 11 Cases other than in accordance with the provisions of the Bankruptcy Code and as disclosed herein.

16. White & Case did not receive any payments from the Debtors within the ninety (90) day period prior to the Petition Date.

#### **BASIS FOR RELIEF**

17. The Committee seeks to retain White & Case as counsel pursuant to sections 1103 and 328(a) of the Bankruptcy Code, the latter of which provides that:

[the C]ommittee . . . with the court's approval, may employ or authorize the employment of a professional person under section 327 or 1103 of this title, as the case may be, on any reasonable terms and conditions of employment, including on a retainer, on an hourly basis, on a fixed or percentage fee basis, or on a contingent fee basis.

18. It is necessary and essential that the Committee, as a fiduciary for all creditors holding unsecured claims, employs counsel to render the aforementioned professional services. The Committee selected White & Case to serve as its counsel because it believes that White & Case is well positioned to provide the legal services that the Committee will require during these Chapter 11 Cases. White & Case is one of the world's leading law firms, with extensive knowledge, experience, and expertise in representing stakeholders in chapter 11 cases, as set forth in the Pesce Declaration. White & Case also has extensive expertise in other fields of law that are implicated by these Chapter 11 Cases including, among others, corporate law, commercial litigation, banking and finance law, capital markets, and tax law.

19. White & Case is expected to render such legal services as the Committee may consider necessary to discharge the Committee's responsibilities and further the interests of its constituents in these Chapter 11 Cases. Based upon the foregoing, the Committee submits that the retention of White & Case is necessary, appropriate, and in the best interests of its constituents.

**WHITE & CASE'S DISINTERESTEDNESS**

20. Section 1103(b) of the Bankruptcy Code provides that an "attorney . . . employed to represent a committee appointed under section 1102 of this title may not, while employed by such committee, represent any other entity having an adverse interest in connection with the case." As set forth in the Pesce Declaration, White & Case does not hold or represent any interest in these Chapter 11 Cases that is adverse to the Debtors. Moreover, section 328(c) of the Bankruptcy Code may apply by incorporation the "disinterested person" standard to the Committee's advisors. To the best of the Committee's knowledge, (i) White & Case is a "disinterested person" within the meaning of section 101(14) of the Bankruptcy Code; (ii) neither White & Case nor its professionals have any connection with the Debtors, the creditors, or any other party in interest except as stated in the Pesce Declaration; and (iii) White & Case does not hold or represent any interest adverse to the Committee in the matters for which it is to be retained.

21. Accordingly, the Committee believes that White & Case is a "disinterested person" as that term is defined in section 101(14) of the Bankruptcy Code and utilized in section 328(c) of the Bankruptcy Code.<sup>3</sup>

22. Additionally, ordering the Committee's retention of White & Case effective as of September 9, 2025 is appropriate. White & Case has been representing the Committee in

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<sup>3</sup> White & Case notes that section 1103 of the Bankruptcy Code does not contain an express requirement that a professional retained by a committee be disinterested.



connection with these Chapter 11 Cases since the date the Committee voted to retain White & Case to act as its counsel. The Debtors believe that no party in interest will be prejudiced by the granting of the employment effective as of September 9, 2025, as provided in this Application, because White & Case has provided and continues to provide valuable services to the Committee and the Debtors' estates. *See also* Local Rule 2014-1(b)(1).

**NOTICE**

23. Notice of this Application has been provided to: (a) the Debtors; (b) the U.S. Trustee; (c) the holders of the thirty (30) largest unsecured claims against the Debtors (on a consolidated basis); (d) the United States Attorney's Office for the Southern District of Texas; (e) the Internal Revenue Service; (f) the United States Securities and Exchange Commission; (g) the state attorneys general for states in which the Debtors conduct business; and (h) any party that has requested notice pursuant to Bankruptcy Rule 2002 and Local Rule 9013-1(d). The Committee submits that, in light of the nature of the relief requested, no other or further notice need be given.

**NO PRIOR REQUEST**

24. No previous application for the relief sought herein has been made by the Debtors to this Court or any other court.

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**CONCLUSION**

WHEREFORE, for the reasons set forth herein, the Committee respectfully requests that the Court grant the relief requested in this Application, the Order, and such other and further relief as is just and proper.

Dated: October 8, 2025

Respectfully submitted,

THE OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS OF  
MODIVCARE INC. *et. al.*

By: Jupiter Asset Management  
Title: Chairperson

/s/ David Rowe  
Name: David Rowe  
Title: Authorized Signatory

**EXHIBIT A**

**Proposed Order**

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

In re

MODIVCARE INC., et al.,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-90309 (ARP)

(Jointly Administered)

**ORDER AUTHORIZING THE EMPLOYMENT  
AND RETENTION OF WHITE & CASE LLP AS  
COUNSEL EFFECTIVE AS OF SEPTEMBER 9, 2025**

[Relates to Docket No. \_\_\_\_]

Upon the application (the “**Application**”)<sup>2</sup> of the Committee for entry of an order (this “**Order**”) pursuant to sections 328(a) and 1103(a) of title 11 of the United States Code (the “**Bankruptcy Code**”), rules 2014 and 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”) and rules 2014-1, 2016 and 9013-1 of the Local Rules of Bankruptcy Practice and Procedure for the United States Bankruptcy Court for the Southern District of Texas (the “**Local Rules**”), authorizing the employment and retention of White & Case LLP (“**White & Case**”) effective as of September 9, 2025 as the Committee’s counsel; and the Court having jurisdiction to consider the Application and the relief requested therein in accordance with 28 U.S.C. §§ 157 and 1334; and consideration of the Application and the relief requested therein

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<sup>1</sup> A complete list of each of the Debtors in the 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’ proposed 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.

<sup>2</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

being a core proceeding pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409; and due, sufficient, and proper notice of the Application having been provided under the circumstances and in accordance with the Bankruptcy Rules and the Local Rules, and it appearing that no other or further notice need be provided; and a hearing having been held, if necessary, to consider the relief requested in the Application (the “**Hearing**”); and upon consideration of the Declarations attached to the Application, and the record of the Hearing, if any, and all of the proceedings had before the Court; and the Court having found and determined that White & Case does not represent or hold any interest adverse to the Debtors’ estates, and is a “disinterested person” as that term is defined under section 101(14) of the Bankruptcy Code and, as required by section 328 of the Bankruptcy Code, that the relief sought in the Application is necessary and in the best interests of the Committee, the Debtors, their estates, their creditors, and all parties in interest, and that the legal and factual bases set forth in the Application establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor,

**IT IS HEREBY ORDERED, ADJUDGED, AND DECREED THAT:**

1. Pursuant to sections 328 and 1103(a) of the Bankruptcy Code and Bankruptcy Rule 2014, the Committee is authorized to employ and retain White & Case as its counsel in these Chapter 11 Cases in accordance with the terms and conditions set forth in the Application, as modified by this Order, effective as of September 9, 2025.

2. In connection with these Chapter 11 Cases, White & Case shall be compensated and reimbursed for expenses in accordance with, and will file, interim and final fee applications for allowance of its compensation and expenses incurred in connection with these Chapter 11 Cases and shall be subject to sections 330 and 331 of the Bankruptcy Code, the Bankruptcy Rules,

the Local Rules, any applicable orders of the Court, and pursuant to any additional procedures this Court deems appropriate. For billing purposes, White & Case shall keep its time in one tenth (1/10) hour increments.

3. To the extent that White & Case uses contract attorneys who are hired by White & Case to provide services to the Committee, White & Case shall (i) pass-through the cost of such attorneys to the Debtors at the same rate that White & Case pays such attorneys, (ii) seek reimbursement for actual out-of-pocket expenses only, and (iii) ensure that such attorneys are subject to the same conflict checks and disclosures as required of White & Case by Bankruptcy Rule 2014.

4. White & Case shall use its reasonable efforts to avoid any duplication of services provided by any of the Committee's other retained professionals in these Chapter 11 Cases.

5. White & Case will review its files periodically during the pendency of these Chapter 11 Cases to ensure that no conflicts or other disqualifying circumstances exist or arise. If any new relevant facts or relationships are discovered or arise, White & Case will use reasonable efforts to identify such further developments and will promptly file a supplemental declaration, as required by Bankruptcy Rule 2014(a).

6. The Debtors and the Committee are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

7. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

8. To the extent that the Application and the Declarations attached thereto are inconsistent with this Order, the terms of this Order shall govern.

9. Notice of the Application as provided therein shall be deemed good and sufficient notice of the Application.

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

Dated: \_\_\_\_\_, 2025  
Houston, Texas

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THE HONORABLE ALFREDO R. PÉREZ  
UNITED STATES BANKRUPTCY JUDGE

**EXHIBIT B**

**Pesce Declaration**



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

In re

MODIVCARE INC., et al.,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-90309 (ARP)

(Jointly Administered)

**DECLARATION OF GREGORY F. PESCE  
IN SUPPORT OF APPLICATION OF THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF AN  
ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF  
WHITE & CASE LLP AS COUNSEL EFFECTIVE AS OF SEPTEMBER 9, 2025**

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I, Gregory F. Pesce, pursuant to 28 U.S.C. § 1746, hereby declare that the following is true and correct to the best of my knowledge, information, and belief:

1. I am a partner of the firm of White & Case LLP (“**White & Case**” or the “**Firm**”), an international law firm, which maintains offices for the practice of law at, among other locations, 111 South Wacker Drive, Suite 5100, Chicago, IL 60606-4302, and 609 Main Street, Suite 2900, Houston, TX 77002. Among other admissions, I am a member in good standing of the Bar of the State of Illinois, and I have been admitted to practice *pro hac vice* in these Chapter 11 Cases [Docket No. 158]. There are no disciplinary proceedings pending against me in any jurisdiction.

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<sup>1</sup> A complete list of each of the Debtors in the 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’ proposed 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. I submit this declaration (the “**Declaration**”) pursuant to sections 328(a) and 1103 of title 11 of the United States Code (the “**Bankruptcy Code**”), rules 2014(a) and 2016 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), and rules 2014-1, 2016-1 and 9013-1 of the Local Rules for the United States Bankruptcy Court for the Southern District of Texas (the “**Local Rules**”) in support of the *Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of September 9, 2025* (the “**Application**”), filed contemporaneously herewith by the Committee.<sup>2</sup> To the extent that any information disclosed herein requires amendment or modification upon White & Case’s completion of further analysis or as additional information becomes available to it, a supplemental declaration will be submitted to the Court reflecting the same. Except as otherwise noted, I have personal knowledge of the matters set forth herein.<sup>3</sup>

### **QUALIFICATIONS OF WHITE & CASE**

3. On September 9, 2025, the Committee selected White & Case to serve as counsel to the Committee to perform all of the services that are necessary and appropriate to discharge the Committee’s responsibilities and further the interests of the Committee’s constituents in these Chapter 11 Cases, subject to approval by the Court.

4. Since that time, White & Case has worked closely with the Committee with respect to these Chapter 11 Cases. White & Case understands that the Committee selected White & Case to serve as its counsel based in part upon the Firm’s extensive knowledge, experience, and

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<sup>2</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to such terms in the Application.

<sup>3</sup> Certain of the disclosures herein relate to matters within the knowledge of attorneys or employees of White & Case and are based on information provided by them.

expertise in representing stakeholders in these Chapter 11 Cases, including in healthcare cases. White & Case also has extensive expertise in other fields of law that are implicated by these Chapter 11 Cases, including, among others, corporate law, commercial litigation, banking and finance law, capital markets, and tax law.

5. White & Case has advised the Committee through a highly qualified team of professionals. The White & Case team has extensive experience in restructuring, corporate law, commercial litigation, banking and finance law, capital markets, tax law, and other areas of expertise that the Committee will require in these Chapter 11 Cases.

6. Given the Firm's experience and knowledge in the fields of debtors', creditors', and equity security holders' rights, and business reorganizations under chapter 11 of the Bankruptcy Code, White & Case is well qualified and uniquely able to act on the Committee's behalf in connection with these Chapter 11 Cases.

### **SERVICES TO BE PROVIDED**

7. The Committee has requested that White & Case render various services, including the following:

- (a) advise the Committee regarding its rights, powers, and duties under the Bankruptcy Code and in connection with these Chapter 11 Cases;
- (b) assist and advise the Committee in its consultations and negotiations with the Debtors concerning the administration of these Chapter 11 Cases;
- (c) assist and advise the Committee in its examination, investigation, and analysis of the acts, conduct, assets, liabilities, and financial condition of the Debtors, including (without limitation) reviewing and investigating prepetition transactions, the operation of the Debtors' business, and the value of such business;
- (d) assist the Committee in the review, analysis, and negotiation of any chapter 11 plan(s) that have been or may be filed and assist the Committee in the review, analysis, and negotiation of the disclosure statement accompanying any chapter 11 plan(s);

- (e) take all necessary action to protect and preserve the interests of the Committee and creditors holding general unsecured claims against the Debtors' estates, including (i) the investigation and possible prosecution of actions enhancing the Debtors' estates including any potential challenges to the scopes of the prepetition security interests of the Company's first lien lenders, and (ii) review and analysis of claims filed against the Debtors' estates;
- (f) review and analyze motions, applications, orders, statements of operations, and schedules filed with the Bankruptcy Court and advise the Committee as to their propriety;
- (g) prepare on behalf of the Committee all necessary pleadings, applications, memoranda, orders, reports, and other papers in support of positions taken by the Committee;
- (h) represent the Committee at all court hearings, statutory meetings of creditors, and other proceedings before this Court;
- (i) assist the Committee in the review, analysis, and negotiation of financing agreements;
- (j) assist and advise the Committee as to its communications with its constituents regarding significant matters in these Chapter 11 Cases, including but not limited to, communications required under section 1102(b)(3) of the Bankruptcy Code; and
- (k) perform such other legal services as required or otherwise deemed to be in the interests of the Committee in connection with these Chapter 11 Cases.

8. Subject to the Court's approval of the Application, White & Case is willing to serve as the Committee's counsel in these Chapter 11 Cases and to perform the services described above.

**COMPLIANCE OF WHITE & CASE WITH  
SECTIONS 1103(b) AND 328(c) OF THE BANKRUPTCY CODE**

9. I am not, nor is White & Case, an insider of the Debtors. To the best of my knowledge, White & Case (i) does not hold or represent any interest in these Chapter 11 Cases that is adverse to the Committee or the Debtors that would preclude the Firm from acting as counsel to the Committee on the matters for which it is to be engaged as required by section 1103(b) of the

Bankruptcy Code, and (ii) is a “disinterested person,” as that term is defined in section 101(14) of the Bankruptcy Code and as may be incorporated by section 328(c) of the Bankruptcy Code.

### **I. Connections Search and Disclosure Process**

10. In accordance with Bankruptcy Rule 2014(a), prior to filing the Application, White & Case conducted a disclosure review with respect to the Firm’s connections to the Debtors and the most significant parties in interest in these Chapter 11 Cases based upon a list of interested parties supplied by counsel to the Debtors, a copy of which is annexed hereto as **Schedule 1** (the “**Potential Parties in Interest**”).

11. To conduct this review, we caused the names of the Potential Parties in Interest to be run through White & Case’s conflicts department to assist in determining whether White & Case has a connection to such parties and, if so, whether such connections relate in any way to the proposed representation of the Committee in these Chapter 11 Cases. Based on reports generated by White & Case’s conflicts department, **Schedule 2** annexed hereto identifies those Potential Parties in Interest that White & Case either (i) currently represents, (ii) does not currently represent but has represented within the last two (2) years, or (iii) reasonably anticipates that it will represent in the near future, as a client in matters unrelated to the Debtors, these Chapter 11 Cases, or such entities’ claims against and interests in the Debtors, except as may otherwise be disclosed in this Declaration.<sup>4</sup> Of the entities listed on Schedule 2, none represented more than 1% of White &

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<sup>4</sup> The term “client” means an entity listed as a client or affiliate of a client in an active or closed matter in White & Case’s conflicts search system. To the extent that a Potential Party in Interest falls under more than one category, such Potential Party in Interest may be disclosed below in only one category. Furthermore, the inclusion of a Potential Party in Interest within one or more categories in the Application, this Declaration, or otherwise is for convenience only and is not, and shall not be construed as, an acknowledgement or admission regarding any Potential Party in Interest, including with respect to any claims or relationships that such Potential Party in Interest may have with the Debtors. Finally, White & Case notes that the process has a limited capability to identify affiliates.

Case's revenue for the twelve-month period through August 31, 2025, except for Deutsche Bank AG New York Branch.

12. To the best of my knowledge and information, White & Case does not hold or represent any interest adverse to the Committee, the Debtors, or their estates and, except as disclosed herein or on Schedule 2, does not have any "connections" to the Debtors' creditors, affiliates, other parties in interest and potential parties in interest, the Office of the U.S. Trustee, or the United States Bankruptcy Judge assigned to these Chapter 11 Cases. I do not believe that any of the representations described on Schedule 2 or listed herein are materially adverse to the interests of the Committee, the Debtors, or their estates. In light of the possibility that certain creditors or other parties in interest may not have been identified on Schedule 1, White & Case may have represented, may currently represent, or may in the future represent such entities in matters wholly unrelated to these Chapter 11 Cases. The information listed on the attached schedules may have changed without our knowledge and may change during the pendency of these Chapter 11 Cases. To the extent that White & Case becomes aware of any such changes, White & Case will promptly conduct a disclosure review with respect to such changes and file a supplemental declaration, if necessary.

13. White & Case is a large global law firm. The Firm and its lawyers provide an extremely broad range of services to numerous clients throughout the world. Because of the Firm's extensive worldwide legal practice, including numerous representations and involvements in bankruptcy cases as counsel to debtor and others, White & Case represents or has in the past represented, in matters unrelated to the Debtors or these Chapter 11 Cases, clients that are adverse, or could be considered potentially adverse, to creditors of the Debtors and other parties in interest in these Chapter 11 Cases, in matters unrelated to these Chapter 11 Cases. However, I do not

believe that such representations would preclude the Firm's representation of the Committee on the matters for which it is to be engaged.

## **II. Disclosures as to Specific Parties in Interest**

14. Beginning on August 14, 2025 and through approximately August 21, 2025, White & Case advised Coliseum Capital Management, LLC ("**Coliseum**") in its capacity as a second lien and unsecured noteholder and equityholder in connection with a potential restructuring of ModivCare. On or about August 21, 2025, Coliseum requested that White & Case cease all work on its representation. Prior to White & Case interviewing with the Committee for its role as Committee counsel, White & Case obtained Coliseum's consent to end this representation, and in turn, represent the Committee in connection with all matters in connection with the Debtors and these Chapter 11 Cases. White & Case internally closed the matter with Coliseum, waived all fees and expenses incurred, and did not collect any payment from Coliseum or appear on Coliseum's behalf in these Chapter 11 Cases in connection with this engagement. White & Case will not represent any other party, including Coliseum, in these Chapter 11 Cases. Accordingly, White & Case's prior representation of Coliseum does not preclude White & Case from satisfying the standard for retention of counsel under section 1103(b) of the Bankruptcy Code.

15. Based upon the information available to me, after following the procedures described herein, and as otherwise described on Schedule 2 hereto or herein, we believe White & Case holds no interest adverse to the Debtors with respect to the matters for which it is to be employed.

## **PROFESSIONAL COMPENSATION**

16. White & Case has agreed to serve as counsel to the Committee and receive compensation and reimbursement in accordance with its standard billing practices for services

rendered and expenses incurred on behalf of the Committee, in accordance with sections 328, 330, and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, or as otherwise ordered by the Bankruptcy Court.

17. White & Case will charge its then current standard rate for the professional services that the White & Case has provided to date and will provide in the future. Currently, the hourly rates charged by White & Case in its U.S. offices range from \$1,690 to \$2,500 for partners, \$1,630 for counsel, \$870 to \$1,580 for associates, and \$355 to \$700 for paraprofessionals. White & Case has advised the Committee that the hourly rates set forth above are subject to periodic review and adjustment in the normal course of the Firm's business, typically on January 1st of each year, and often due to the increased experience of a particular professional. Such adjustments were last made in January 2025. In the event that its billing rates increase, White & Case will provide notice of any rate increases in the fee statements in which such increased rates are in effect.

18. These hourly rates set forth above are White & Case's current standard rates and (as noted above) are subject to periodic adjustment in the ordinary course of business. These rates are set at a level designed to fairly compensate White & Case for the work of its attorneys and paraprofessionals and to cover fixed and routine overhead expenses.

19. White & Case also charges its clients in all areas of practice for expenses incurred in connection with each client's case. The expenses charged to clients include, among other things, printing and photocopying, postage and package delivery charges, e-discovery expenses, court fees, transcript costs, travel expenses, expenses for overtime meals, and computer-aided research. White & Case will seek reimbursement, subject to the Court's approval, for all such expenses incurred by White & Case on the Committee's behalf. All requests for reimbursement of expenses will be consistent with any guidelines established by the Bankruptcy Court.



20. White & Case shall apply to this Court for allowance of compensation for professional services rendered and reimbursement of expenses in accordance with sections 330 and 331 of the Bankruptcy Code and applicable provisions of the Bankruptcy Rules, the Local Rules, any other applicable procedures and orders of the Court, for all professional services performed and expenses incurred in these Chapter 11 Cases.

21. Pursuant to Bankruptcy Rule 2016(b), White & Case has no agreement with any other entity to share any compensation received by White & Case, except as permitted under section 504(b)(1) of the Bankruptcy Code. White & Case has not received any promises as to payment or compensation in connection with these Chapter 11 Cases other than in accordance with the provisions of the Bankruptcy Code and as disclosed herein.

22. White & Case did not receive any payments from the Debtors within the ninety (90) day period prior to the Petition Date.

23. Based upon the foregoing, I respectfully submit that the requirements for White & Case's retention as attorneys for the Committee have been met.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: October 8, 2025  
Chicago, Illinois

/s/ Gregory F. Pesce  
Gregory F. Pesce  
Partner, White & Case LLP

**SCHEDULE 1****Potential Parties in Interest List Provided by Debtors<sup>1</sup>****DEBTORS**

MODIVCARE INC. (F/K/A THE PROVIDENCE CORPORATION)  
 A & B HOMECARE SOLUTIONS, L.L.C  
 A.E. MEDICAL ALERT, INC.  
 ABC HOMECARE LLC  
 ALL METRO AIDS, INC.  
 ALL METRO ASSOCIATE PAYROLL SERVICES CORPORATION  
 ALL METRO CGA PAYROLL SERVICES CORPORATION  
 ALL METRO FIELD SERVICE WORKERS PAYROLL SERVICES CORPORATION  
 ALL METRO HEALTH CARE SERVICES, INC.  
 ALL METRO HOME CARE SERVICES OF FLORIDA, INC.  
 ALL METRO HOME CARE SERVICES OF NEW JERSEY, INC.  
 ALL METRO HOME CARE SERVICES OF NEW YORK, INC.  
 ALL METRO HOME CARE SERVICES, INC.  
 ALL METRO MANAGEMENT AND PAYROLL SERVICES CORPORATION  
 ALL METRO PAYROLL SERVICES CORPORATION  
 AM HOLDCO, INC.  
 AM INTERMEDIATE HOLDCO, INC.  
 ARSENS HOME CARE, INC.  
 ARU HOSPICE, INC.  
 ASSOCIATED HOME SERVICES, INC.  
 AT-HOME QUALITY CARE, LLC (F/K/A AT-HOME QUALITY CARE, INC.)  
 AUDITORY RESPONSE SYSTEMS, INC.  
 BARNEY'S MEDICAL ALERT-ERS, INC.  
 CALIFORNIA MEDTRANS NETWORK IPA LLC  
 CALIFORNIA MEDTRANS NETWORK MSO LLC  
 CARE FINDERS TOTAL CARE LLC  
 CAREGIVERS ALLIANCE, LLC  
 CAREGIVERS AMERICA HOME HEALTH SERVICES, LLC

CAREGIVERS AMERICA MEDICAL STAFFING, LLC  
 CAREGIVERS AMERICA MEDICAL SUPPLY, LLC  
 CAREGIVERS AMERICA REGISTRY, LLC  
 CAREGIVERS AMERICA, LLC.  
 CAREGIVERS ON CALL, INC.  
 CGA HOLDCO, INC.  
 CGA STAFFING SERVICES, LLC  
 CIRCULATION, INC.  
 FLORIDA MEDTRANS NETWORK LLC  
 FLORIDA MEDTRANS NETWORK MSO LLC  
 GUARDIAN MEDICAL MONITORING, LLC  
 HEALTH TRANS, INC.  
 HEALTHCOM, INC.  
 HEALTHCOM HOLDINGS LLC  
 HELPING HAND HOME HEALTH CARE AGENCY INC  
 HELPING HAND HOSPICE INC.  
 HIGI CARE HOLDINGS, LLC  
 HIGI CARE, LLC  
 HIGI SH HOLDINGS INC.  
 HIGI SH LLC  
 INDEPENDENCE HEALTHCARE CORPORATION  
 METROPOLITAN MEDICAL TRANSPORTATION IPA, LLC  
 MLA SALES, LLC  
 MODIVCARE SOLUTIONS, LLC  
 MULTICULTURAL HOME CARE INC.  
 NATIONAL MEDTRANS, LLC  
 NEW ENGLAND EMERGENCY RESPONSE SYSTEMS, INC.  
 OEP AM, INC.  
 PANHANDLE SUPPORT SERVICES, INC.  
 PERSONAL IN-HOME SERVICES, INC.  
 PHILADELPHIA HOME CARE AGENCY, INC.  
 PROVADO TECHNOLOGIES, LLC  
 RED TOP TRANSPORTATION, INC.  
 RIDE PLUS, LLC  
 SAFE LIVING TECHNOLOGIES, LLC

<sup>1</sup> This list (and the categories contained herein) are for purposes of a conflicts check only and should not be relied upon by any party as a list of creditors or for any other purpose. Latham has attempted to remove duplicate entries where possible. Accordingly, a party that otherwise would fall under multiple categories is likely to be listed under only one category. Additionally, certain of the Debtors' debt obligations or equity interests may be held by more than one affiliated entity within the same financial institution. Where the affiliation of such entities is obvious based on their names, only one entity is included herein.

SECURA HOME HEALTH HOLDINGS, INC.  
(F/K/A HEARTS AY HOME HOLDINGS, INC.)  
SECURA HOME HEALTH, LLC (F/K/A HEARTS  
AT HOME, LLC)  
SOCRATES HEALTH HOLDINGS, LLC

TRIMED, LLC  
UNION HOME CARE LLC  
VALUED RELATIONSHIPS, INC.  
VICTORY HEALTH HOLDINGS, LLC  
VRI INTERMEDIATE HOLDINGS, LLC

**NON-DEBTOR AFFILIATES**

PROMETHEUS HOLDCO, LLC  
ARUBU, INC.  
HIGI SH CANADA ULC  
INGEUS INVESTMENTS LIMITED  
INGEUS, LLC

MERCURY PARENT, LLC  
MODIVCARE LABS PRIVATE LIMITED  
NEMT INSURANCE DE LLC, SERIES 1  
MEDTRANS NETWORK IPA, LLC

**DEBTORS' PREVIOUS NAMES, PREDECESSORS, AND RELATED ENTITIES**

MODIVCARE INC. (F/K/A THE PROVIDENCE  
CORPORATION)  
AT-HOME QUALITY CARE, LLC (F/K/A AT-  
HOME QUALITY CARE, INC.)  
SECURA HOME HEALTH HOLDINGS, INC. (F/K/A  
HEARTS AY HOME HOLDINGS, INC.)

SECURA HOME HEALTH, LLC (F/K/A HEARTS  
AT HOME, LLC)

**DEBTORS' RESTRUCTURING AND OTHER SIGNIFICANT PROFESSIONALS**

FTI CONSULTING, INC.  
HUNTON ANDREWS KURTH LLP  
LATHAM & WATKINS LLP  
MOELIS & COMPANY

KURTZMAN CARSON CONSULTANTS, LLC  
(D/B/A VERITA GLOBAL)  
QUINN EMMANUEL URQUHART & SULLIVAN  
LLP

**DEBTORS' ORDINARY COURSE PROFESSIONALS**

ANYBILL  
BRADLEY ARANT BOULT CUMMINGS LLP  
CAPITAL IMPACT GROUP LLC  
ERNST & YOUNG US LLP  
GIBSON, DUNN & CRUTCHER LLP  
KELLEY CONSULTING  
KPMG LLP  
LITTLER MENDELSON PC  
M J SIMON & COMPANY LLC

NIXON PEABODY LLP  
POL SINELLI PC  
PRICEWATERHOUSE COOPERS LLP  
RODEFER MOSS & CO PLLC  
STATE EMPLOYEES' CREDIT UNION  
STEVENS & LEE P.C.  
WILLCOX SAVAGE CONSULTING LLC  
WILLOUGHBY HUMPHREY & D'ANTONI PA

**PROFESSIONALS FOR OTHER MAJOR STAKEHOLDERS**

PAUL HASTINGS LLP  
CHILMARK PARTNERS, LLC  
LAZARD FRERES & CO. LLC

**MAJOR EQUITY HOLDERS<sup>11</sup>**

AI CATALYST FUND, LP  
ARISTOTLE CAPITAL BOSTON, LLC  
COLISEUM CAPITAL MANAGEMENT, LLC  
D.E. SHAW & CO  
SCEPTER HOLDINGS, INC.

SSGA ACTIVE TRUST  
THE VANGUARD GROUP, INC.  
BARROW, HANLEY, MEWHINNEY & STRAUSS  
LLC

**CURRENT AND FORMER OFFICERS AND DIRECTORS (UP TO 3 YEARS)**

ANNE BAILEY  
BARBARA GUTIERREZ  
CAROLYN MCCARTHY  
CHELSEY BERSTLER  
CHRIS ECHOLS  
CHRIS HEINE  
CHRIS SHACKELTON  
CRAIG BARBAROSH  
DAMON GREEN  
DAVID COULTER  
FAISAL KHAN  
FRANCIS JACKSON WRIGHT  
GARTH GRAHAM  
ILIAS SIMPSON  
JAMES WATSON  
JARON ROSS  
JEFF BENNETT

JENNIFER JASKOLKA  
JODY KEPLER  
JONATHAN BUSH  
L. HEATH SAMPSON  
LESLIE V. NORWALK  
MIA HANEY  
NEAL GOLDMAN  
RAHUL DIGAMBER SAMANT  
RICHARD A. KERLEY  
SHANE RAGLAND  
TODD CARTER  
ALEC CUNNINGHAM  
DAVID MOUNTS GONZALES  
ERIN RUSSELL  
DANIEL. B SILVERS

**TRUSTEES, AGENTS, SECURED LENDERS (INCLUDING CERTAIN BOND HOLDERS), AND OTHER  
POTENTIAL LIENHOLDERS**

ALLIANCEBERNSTEIN HOLDING LP  
ALLSPRINGS GLOBAL INVESTMENTS  
ANKURA TRUST COMPANY, LLC  
BANK OF AMERICA, N.A.  
BARCLAYS BANK PLC  
BEACH POINT CAPITAL MANAGEMENT  
BIRCH GROVE CAPITAL  
BNP PARIBAS S.A.  
BRIGADE CAPITAL MANAGEENT  
CHILMARK PARTNERS, LLC  
CIBC BANK USA  
COMERICA BANK  
D.E. SHAW & CO  
DEUTSCHE BANK AG NEW YORK BRANCH  
ENSIGN PEAK ADVISORS  
FIAM LLC AN AFFILIATE OF FIDELITY  
INVESTMENTS  
HALSEYPOINT ASSET MANAGEMENT, LLC

HEWLETT-PACKARD FINANCIAL SERVICES  
COMPANY  
HG VORA CAPITAL MANAGEMENT  
HSBC BANK PLC  
JEFFERIES FINANCE LLC  
JP MORGAN CHASE BANK, N.A.  
JUPITER ASSET MANAGEMENT  
KEYBANK, NATIONAL ASSOCIATION  
MADISON AVENUE INTERNATIONAL LP  
METROPOLITAN WEST ASSET MANAGEMENT  
NEUBERGER BERMAN GROUP  
POLAR ASSET MANAGEMENT PARTNERS  
INC.  
PRIVATEBANK AND TRUST COMPANY  
Q5-R5 TRADING, LTD.  
REDWOOD CAPITAL MANAGEMENT  
REGIONS BANK  
ROARING FORK TRADING  
SILVER ROCK FINANCIAL LP

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<sup>11</sup> For purposes of this list, major equity holders are considered to be persons or entities who held in excess of 1% of the Debtors' equity securities as of the Petition Date.

SILVER ROCK MANAGEMENT LLC  
SUMMIT HOUSE CAPITAL MANAGEMENT,  
LLC  
SUMITOMO MITSUI BANKING CORPORATION  
TCW ASSET MANAGEMENT COMPANY  
TCW GROUP

TEXAS EXCHANGE BANK  
TRUIST BANK  
U.S. BANK EQUIPMENT FIANANCE  
WELLS FARGO BANK, N.A.  
WILMINGTON TRUST  
WSFE BANK

**OTHER NOTEHOLDERS**

JUPITER FUND MANAGEMENT  
BLACKROCK  
STATE STREET  
OLIVE STREET INVESTMENT ADVISERS

GRACE PARTNERS OF DUPAGE  
CANADIAN IMPERIAL BANK  
AMERIPRISE FINANCIAL  
POLEN CAPITAL MANAGEMENT

**TOP 30 UNSECURED CREDITORS**

1800MEDIVAN INC  
ACTIVE SC ONE INC  
AM PM MEDICAL TRANSPORTATION COMPANY  
INC  
AMAZON WEB SERVICES, INC.  
BASIN INNOVATION GROUP LLC  
BERHANU ALAZE  
BEST NEIGHBOR TRANSPORTATION LLC  
BROADRIDGE ICS  
CDW DIRECT  
CHEIIS TRANSPORT LLC  
ELITE HOME CARE LLC  
EMPLOYEES PROVIDENT FUND ORGANISATION  
GALAXY AMBULANCE LLC  
HOMECARE SOFTWARE SOLUTIONS LLC  
HOSPITAL TO HOME LLC  
HUMANA, INC.  
IBEX GLOBAL FZ-LLC  
KDK TRANSPORT COMPANY

LIFE TECH INC  
LYFT HEALTHCARE INC  
METRO ONE AMBULANCE INC.  
MORRIS AND COMPANY  
ORION CONSULTING  
PNP GROUP LLC  
RANDSTAD NORTH AMERICA LP  
REYNO CAR SERVICE INC  
RIDE SOURCE INC  
SHELTERPOINT LIFE INSURANCE CO  
SKORI INC  
SOFTSERVE INC.  
SUNSHINE STATE HEALTH PLAN INC.  
TRICARE AT INSPIRA LLC  
UBER HEALTH LLC  
UNITED HEALTHCARE SERVICES INC  
WILMINGTON SAVINGS FUND SOCIETY, FSB  
WSFS BANK

**MAJOR SUPPLIERS AND VENDORS**

3 OMR LLC  
AB EXPRESS TRANSPORT LLC  
ACADIAN AMBULANCE SERVICE OF NEW  
ORLEANS  
ADVANCED MEDICAL TRANSPORT CORP  
AIRPORT EXPRESS INC  
AIRPORT TAXI INC  
ACE USA  
ALCHEMY TECHNOLOGY GROUP LLC  
ALL AIRPORT TAXI INC  
ALLMED TRANSPORTATION INC  
ALPHA MEDICAL TRANSPORTATION INC  
AMERICAN EXPRESS  
AMERICAN GROUND TRANSPORTATION  
AMERICAN MEDICAL RESPONSE WEST  
ARISE VIRTUAL SOLUTIONS INC  
ASSIST MEDICAL SERVICE INC  
ASTRA CARE LLC

BIG DOG CITY CORPORATION  
BIG ISLAND LIMOUSINE INC  
C & H COMPANY  
CALIFORNIA ACCESS INC  
CITY OF SACRAMENTO FIRE DEPARTMENT  
CLX MEDICAL TRANSPORT INC  
COMPASSION CARE SENIOR SERVICES  
COMPLETE MEDICAL TRANSPORT CORP  
DEPENDACARE TRANSPORTATION LLC  
DURICARE INC  
EASTWESTPROTO INC  
ELITE CARE AMBULANCE INC  
ETA TRANS INC  
EXPRESS TRANSPORTATION AGENCY  
FASTCARE MEDICAL TRANSPORTATION LLC  
FREEUS, LLC  
GALAXY AMBULANCE LLC  
GOLD STAR EMS LLC

GOLDEN STATE MANAGEMENT GROUP INC  
GOOD VIBES MEDICAL TRANSPORTATION LLC  
GOODWILL TRANSPORTATION SERVICES LLC  
HULIN TRANSPORTATION, INC  
IBEX GLOBAL SOLUTIONS  
INDEPENDENT CAB  
INTEGRITY MEDICAL TRANSPORTATION CORP  
INTEGRITY MEDICAL TRANSPORTATION CORP  
JOHNSON MEDICAL TRANSPORT LLC  
JUDI'S CARRIER SERVICE INC  
KIBOIS COMMUNITY ACTION FOUNDATION, INC  
KWPH ENTERPRISES  
L & L TRANSPORTATION LLC  
LALIBELA TRANSPORTATION LLC  
LUCY TRANSPORTATION INC  
LYFT INC.  
M & M GROUP INC  
MARE TRANSPORTATION INC  
MARVEL MEDICAL TRANSPORT LLC  
MEDEX TRANSPORTATION INC  
MEDICAL TRANSPORT SOLUTIONS INC  
MEDICAL XPRESS NON EMERGENCY  
TRANSPORT  
MEDLINK MEDICAL TRANSPORT INC  
METRO ONE AMBULANCE INC  
MONTES DE OCA CORP DBA MK UNLIMITED  
NEW JERSEY TRANSIT CORP  
ON TIME AMBULANCE INC  
P & I TRANSPORTATION INC  
PATTERSON TRANSPORTATION SERVICE LLC  
PAUL D RONALD  
PONY CARE TRANSPORTATION INC.  
PRO TRANSPORT-1, LLC  
PROCARE MEDICAL TRANSPORTATION CORP  
PULSE MEDICAL TRANSPORTATION

#### **MAJOR CUSTOMERS**

ALAMEDA ALLIANCE FOR HEALTH  
ARKANSAS DEPARTMENT OF HUMAN SERVICES  
OFFICE OF PROCUREMENT  
BLUE CROSS OF CALIFORNIA  
BROADRIDGE ICS  
COMMONWEALTH OF VIRGINIA DEPARTMENT  
OF MEDICAL ASSISTANCE SERVICES  
COMMONWELTH OF PENNSYLVANIA  
DEPARTMENT OF HUMAN SERVICES  
COMMONWELTH OF VIRGINIA DEPARTMENT OF  
MEDICAL ASSISTANCE SERVICES  
COVENTRY HEALTH CARE OF VIRGINIA  
HEALTH CARE SERVICE CORPORATION  
HEALTH NET OF CALIFORNIA, INC.  
HEALTHFIRST HEALTH PLAN, INC.  
HUMANA MEDICAL PLAN  
OKLAHOMA HEALTH CARE AUTHORITY

QUICK PICK TRANSPORTATION INC.  
RECVUE INC  
RESOURCE MANAGEMENT SYSTEMS INC  
RICHMOND CITY TAXI CAB INC  
RIDE PLUS LLC  
ROMED INC  
ROYAL CAB INC  
ROYAL MEDICAL TRANSPORTATION LLC  
ROYAL TRANSPORTATION LLC  
SACRAMENTO METROPOLITAN FIRE  
DISTRICT  
SAFETY 1ST PARATRANSIT INC  
SAHRAWI INC  
SALESFORCE.COM INC  
SHIRETOWN SOLUTIONS LLC  
SHUTTLE RUIDOSO LLC  
SKORI INC  
SKY TRANSPORTATION LLC  
SOUTHEAST TRANSPORTATION SERVICES  
LLC  
SUNSHINE MEDICAL TRANSPORT LLC  
TEDLA TRANSPORTATION  
TEPLIS TRAVEL SERVICE  
TEXAS MEDICAL TRANSPORTATION  
TOP GUN TRANSIT LLC  
TRANSPORT SOLUTIONS  
TRANSPORT4ELDERS LLC  
TRICARE MEDICAL TRANSPORTATION  
VA TRANSPORT LLC  
VALLEY MEDICAL TRANSPORT LLC  
VXI GLOBAL SOLUTIONS LLC  
WORKBOARD INC  
WORKDAY INC  
YELLOW CAB MEDICAL TRANSPORT LLC

ORANGE COUNTY HEALTH AUTHORITY  
SENTARA HEALTH ADMINISTRATION  
SOUTH CAROLINA DEPARTMENT OF HEALTH  
AND HUMAN SERVICES  
STATE OF DELAWARE, DEPARTMENT OF  
HEALTH AND SOCIAL SERVICES  
THE GEORGIA DEPARTMENT OF  
COMMUNITY HEALTH  
THE STATE OF MAINE, DEPARTMENT OF  
HEALTH AND HUMAN SERVICES  
THE STATE OF NEW JERSEY, DIVISON OF  
MEDICAL ASSISTANCE AND HEALTH  
SERVICES  
THE WEST VIRGINIA BUREAU FOR MEDICAL  
SERVICES  
UNITED HEALTH CARE INSURANCE  
COMPANY

**DEBTORS' BANKS**

WELLS FARGO BANK, N.A.  
WEBSTER BANK, N.A.  
PNC BANK, N.A.  
IMPERIAL BANK OF CANADA  
CITIZENS BANK, N.A.  
BANC OF CALIFORNIA, INC.

HSBC HOLDINGS PLC.  
VANTAGE BANK TEXAS  
TRUIST FINANCIAL CORPORATION  
MORGAN STANLEY  
U.S. BANCORP

**INSURANCE PARTIES**

ACE AMERICAN INSURANCE COMPANY  
(CHUBB)  
ACE FIRE UNDERWRITERS INSURANCE  
COMPANY (CHUBB)  
ALLIANZ GLOBAL RISKS US INSURANCE  
COMPANY  
ALLIANT INSURANCE SERVICES, INC.  
ARCH INSURANCE COMPANY  
ARCH SPECIALTY INSURANCE COMPANY  
BERKELEY SPECIALTY INSURANCE  
BERKSHIRE HATHAWAY SPECIALTY  
INSURANCE COMPANY  
BERKSHIRE HATHAWAY SPECIALTY  
INSURANCE COMPANY  
COBBS ALLEN CAPITAL HOLDINGS, LLC  
CONTINENTAL CASUALTY COMPANY (CNA)  
ENDURANCE AMERICAN INSURANCE  
COMPANY  
ENDURANCE AMERICAN INSURANCE  
COMPANY (SOMPO)  
ENDURANCE AMERICAN SPECIALTY  
INSURANCE COMPANY  
ESIS, INC.  
FAIR AMERICAN INSURANCE AND  
REINSURANCE COMPANY (ATRI)  
FAIRMATIC (SIRIUSPOINT SPECIALTY  
INSURANCE COMPANY)  
FEDERAL INSURANCE COMPANY (CHUBB)  
FIREMAN'S FUND INSURANCE COMPANY  
(ALLIANZ)

FIREMAN'S FUND INSURANCE COMPANY  
GREAT AMERICAN INSURANCE COMPANY  
ILLINOIS UNION INSURANCE COMPANY  
(CHUBB)  
INDEMNITY INSURANCE COMPANY OF  
NORTH AMERICA (CHUBB)  
LANDMARK AMERICAN INSURANCE  
COMPANY  
LANDMARK AMERICAN INSURANCE  
COMPANY (R-T SPECIALTY)  
LIBERTY SURPLUS INSURANCE  
CORPORATION  
MERCER INSURANCE COMPANY (R-T  
SPECIALTY)  
MSIG SPECIALTY INSURANCE USA  
(PROPRAXIS)  
NATIONAL UNION FIRE INSURANCE  
COMPANY OF PITTSBURGH, PA. (AIG)  
RSUI INDEMNITY COMPANY (R-T  
SPECIALTY)  
SCOTTSDALE INSURANCE COMPANY  
(PROPRAXIS)  
SIRIUSPOINT LTD.  
TRAVELERS CASUALTY AND SURETY  
COMPANY OF AMERICA  
WESTFIELD SELECT INSURANCE COMPANY  
W. R. BERKLEY CORPORATION  
XL SPECIALTY INSURANCE COMPANY  
XL SPECIALTY INSURANCE COMPANY

**SURETY BOND ISSUERS & BENEFICIARIES**

AMERIGROUP PARTNERSHIP PLAN, LLC  
ATLANTIC SPECIALTY INSURANCE  
COMPANY  
BLUE CROSS OF CALIFORNIA DBA ANTHEM  
BLUE CROSS  
COMMONWEALTH OF VIRGINIA  
DELAWARE FIRST HEALTH, INC  
ELEVANCE HEALTH, INC.  
FEDERAL INSURANCE COMPANY

MAGNOLIA HEALTH PLAN, INC.  
OKLAHOMA COMPLETE HEALTH, INC. C/O  
CENTENE CORPORATION  
PENNSYLVANIA PUBLIC UTILITY  
COMMISSION  
SIRIUSPOINT AMERICA INSURANCE  
COMPANY  
STATE OF ALABAMA



STATE OF CONNECTICUT DEPARTMENT OF  
CONSUMER PROTECTION  
STATE OF FLORIDA, AGENCY FOR HEALTH  
CARE ADMINISTRATION  
STATE OF INDIANA, FAMILY AND SOCIAL  
SERVICES ADMINISTRATION, OFFICE OF  
MEDICAID POLICY AND PLANNING  
STATE OF MAINE DEPARTMENT OF  
TRANSPORTATION

STATE OF NEW JERSEY  
STATE OF SOUTH CAROLINA, DEPT. OF  
HEALTH AND HUMAN SERVICES  
TRAVELERS CASUALTY AND SURETY  
COMPANY OF AMERICA  
VIRGINIA DEPARTMENT OF MOTOR  
VEHICLES  
WELLCARE AFFILIATES  
WESTCHESTER FIRE INSURANCE COMPANY

**LANDLORDS**

1 AVENUE C BUILDING MADISON  
111 WASHINGTON STREET REALTY LLC  
1590 ADAMSON LLC  
174 JEFFERSON, LLC  
18 SHEPARD STREET LLC  
1978 THIRD AVENUE LLC  
22 WEST MAIN LLC  
26 JOURNAL SQUARE OWNER LLC  
30 PECK ROAD LLC  
307-319 W LANDIS LLC  
330 SCANGAS NOMINEE TRUST  
39 CROSS 79 PROSPECT REALTY TRUST  
400 SOUTHBOROUGH LLC  
446A BLAKE LLC C/O TOM GELMAN  
6900 LAYTON SUBSIDIARY, LLC  
70 EAST SUNRISE HWY LLC  
7055 BRANDY HILL PLAZA ASSOCIATES LLC  
75 BROAD LLC  
8 PENN CENTER OWNER LP  
800 BRIDGECAM LLC  
8818 EXPEDITION LLC  
ALBANY TOWERS LLC  
AVANTI HOLDINGS LLC  
BALANCE HOLDINGS, LLC  
BANTA MANAGEMENT LLC  
BLOOMFIELD BK, LLC  
BLS ASSET MANAGEMENT CORP  
BOIC PROPERTIES LLC  
BRIDGE33 REAL ESTATE PARTNERS LP  
BUFFINGTON PROPERTY MANAGEMENT LLC  
BYRON KOTZAS & OLGA DOMOTOR ETAL PT  
CGP DEVELOPMENT CO INC  
CIPHER REALTY  
CITATION INVESTMENTS INC  
CITY OF NORTON  
COLIN DUNCAN  
COLONIAL CENTRE SQUARE LLC  
DAVIS PROFESSIONAL PARK LLC  
DEBRA SAYLES  
DF ACQUISITIONS LLC  
DIAMOND PROPERTY MANAGEMENT, LLC  
EDGEWATER CORPORATE PARK LLC  
ELM GROVE REALTY, LLC  
ENGHOUSE INTERACTIVE INC

EWING EQUITIES, LLC  
FORTUNATO REALTY INC  
GARVEY PROPERTIES  
GPI-CAL REALTY I LP  
HANOVER PLAZA ASSOCIATES  
HM SKY HARBOR, LLC  
HURON GROUP INC  
JMDJMS LIMITED LIABILITY COMPANY  
KAGR2 BINGHAMTON LLC  
KOAM INVESTORS GROUP, LLC  
KELLAR INDUSTRIES, LLC  
LAPP LIMITED PARTNERSHIP  
LEE, WEST & WALSH, LP  
LEGERE PROPERTIES LLC  
MARK J. OTERI  
MARQUEZ-ENT, LLC  
MAYNARD ROAD CORP  
MCCORMACK FAMILY LIMITED  
PARTNERSHIP  
MELLIN LIMITED PARTNERSHIP  
METROPLEX ASSOCIATES 1  
METROPLEX ASSOCIATES 2  
MIAMI LAKES CENTER LLC  
MJH WACKER LLC  
NICOLAS HERRERA  
NORTH PARK OFFICE LLC  
PALISADE PLAZA WEST LLC  
PALM BEACH BUSINESS CENTER  
PARTNERSHIP  
PAVILION UNIT ACQUISITION LP  
PEAK REALTY ENTERPRISES LLC  
PREMIUM ASSET MANAGEMENT, INC.  
PRIMECO TOWERS INDIA  
Q2U2 LLC  
REGUS  
RNSI CITY PLACE JV LLC  
ROBERT & PATRICIA AIKEN  
ROBERT L ECKLIN  
ROBERT L. ALBERTSON, JR.  
ROC II FAIRLEAD GRAN PARK AVENUES LLC  
S&N LAWRENCE REALTY LLC  
S&R LLC  
SEAMLESS CENTENNIAL LTD  
SEMYA I LLC



SHELBOURNE LAFAYETTE LLC  
SHRESTHA P MANAGEMENT LLC  
SIKYU ENTERPRISES LLC  
SL TOWN CENTER REALTY, LLC  
SPIEGEL & SPIEGEL PA MONEY PURCHASES  
PENSION PLAN AND 401 K PROFIT SHARING  
PLAN  
SUMMIT INVESTMENTS PROPERTIES LLC  
TANIOS REALTY LLC  
THE WE COMPANY MANAGEMENT  
HOLDINGS L.P.  
THOMAS A BECKER  
THORNE PROPERTIES

TN BROTHER LLC  
TSK MORRIS LLC  
TSO ICP LP  
UNIVERSITY AVENUE LLC  
USA EQUITY TRUST LLC  
WATER STREET REALTY TRUST  
WEWORK  
WEBBS PROPERTY LLC  
WICK SHOPPING PLAZA ASSOCIATES LLC  
WILLOWOOD PARK LLC  
WOODSIDE SPECIAL OPPORTUNITY PE FUND  
LP

### **UTILITIES**

11:11 SYSTEMS, INC.  
3N DOCUMENT DESTRUCTION INC  
4 ELOHIM CLEANING INC.  
A&E LOW VOLTAGE SOLUTIONS LLC  
8X8 INC  
A1 DATASHRED  
A&E LOW VOLTAGE SOLUTIONS LLC  
ABINGTON TOWNSHIP POLICE DEPARTMENT  
ACCURATE FIRE EQUIPMENT CORP  
ADT US HOLDINGS INC  
AFFORDABLE PEST CONTROL, INC.  
AFFORDABLE SHRED AND STORAGE  
ALLIED FIRE & SAFETY EQUIPMENT CO, INC.  
AMERICAN ELECTRIC POWER  
AT&T  
AT&T MOBILITY  
ATMOS ENERGY CORPORATION  
BANDWIDTH INC.  
BLOOM SERVICES LLC  
BOARDMAN FIRE EXTINGUISHER CO INC  
BOROUGH OF CLARKS SUMMIT  
BOSTON FIRE EXTINGUISHER CO INC  
BRISCOE PROTECTIVE LLC  
BUEHLER MOVING AND STORAGE CO  
CHARTER COMMUNICATIONS  
CINTAS CORPORATION NO. 2  
CITY OF PERTH AMBOY  
CITY OF SULLIVAN (CIVIC CENTER)  
CITY OF TEMPE POLICE DEPARTMENT  
CITY OF VINELAND - FIRE  
CLEARFIELD MUNICIPAL AUTHORITY  
COGENT COMMUNICATIONS, LLC  
COLOGIX  
COLONIAL RECORD STORAGE  
COMCAST  
COMMONWEALTH EDISON COMPANY  
CON EDISON CO OF NEW YORK  
CORNING NATURAL GAS CORP  
COX COMMUNICATIONS ARIZONA, LLC  
DATA STRUCTION

DIALPAD INC.  
EARTHWORKS LANDSCAPE & DESIGN INC  
ELIZABETHTOWN GAS COMPANY  
EMERGENT POWER SOLUTIONS LLC  
ENTERGY UTILITY HOLDING COMPANY, LLC  
FIRE PROTECTION PRODUCTS  
FIRE PROTECTION SERVICE CORPORATION  
FIRSTENERGY CORP  
FLORIDA POWER AND LIGHT  
FRANKLIN TOWNSHIP SUPERVISORS  
FRONTIER COMMUNICATIONS  
G&G PROPERTY MAINTENANCE  
GROUNDSYSTEMS, INC  
IMWOTH LLC  
INFOSHRED LLC  
INTERNATIONAL TELCOM, LLC  
IRIS GROUP HOLDINGS LLC  
IRON MOUNTAIN  
IRON MOUNTAIN INCORPORATED  
JEMPS MANAGEMENT  
JOHN'S REFUSE & RECYCLING, LLC  
LEVEL 3 COMMUNICATIONS LLC  
LONG ISLAND LIGHTING CO  
LOWITT ALARMS SECURITY SYSTEM  
LS REMOLENG LLC  
MARMIC FIRE AND SAFTEY CO INC  
MASERGY COMMUNICATIONS, INC.  
MONONGAHELA POWER CO  
MOUNTAINEER GAS COMPANY  
NATIONAL GRID  
NEPTUNE FIRE DISTRICT #1  
NEW JERSEY-AMERICAN WATER COMPANY  
NIAGARA MOHAWK POWER CORPORATION  
NJR HOME SERVICES COMPANY  
NORTH CENTRAL SIGHT SERVICES INC  
NYSEG  
ON SITE CONFIDENTIAL SHREDDING JJMR  
LLC  
PACKETFABRIC INC  
PALISADE PLAZA WEST LLC

PECO ENERGY COMPANY  
PENNSYLVANIA AMERICAN WATER  
COMPANY  
PENNSYLVANIA ELECTRIC COMPANY  
PJSJ ENTERPRISES INC  
PPL ELECTRIC UTILITIES CORPORATION  
PSE&G CO  
REPUBLIC SERVICES, INC.  
ROCHESTER GAS AND ELECTRIC CORP  
ROMAN SENTRY SECURITY SYSTEMS, INC.  
RUMPKE OF OHIO, INC.  
SAFT LTD  
SANGOMA US INC.  
SECURITAS TECHNOLOGY CORPORATION  
SECURITY RESOURCES INC  
SERVICE LOGIC STRATEGIC SERVICES, LLC  
SOME LIKE IT GREEN LLC  
SOUTH JERSEY GAS  
STERICYCLE INC  
SUMMIT FIRE & SECURITY LLC  
TEXAS GAS SERVICE

THE ADT SECURITY CORPORATION  
(INACTIVE)  
THE CONNECTICUT LIGHT AND POWER CO  
THE SHREDDING SOURCE  
THE SOUTHERN CONNECTICUT GAS  
COMPANY  
THE UNITED ILLUMINATING COMPANY  
T-MOBILE USA INC  
TITANIUM SECURITY & SURVEILLANCE LLC  
TOWN OF NORTH ATTLEBOROUGH  
TOWNSHIP OF PARSIPPANY  
UGI UTILITIES INC  
VEOLIA WATER NEW JERSEY INC  
VERIZON COMMUNICATIONS INC.  
VINELAND MUNICIPAL UTILITES  
VITAL RECORDS HOLDINGS LLC  
WHITE PALMS FIRE EQUIPMENT INC  
WIGGINS SHREDDING, INC  
WINDSTREAM  
WM CORPORATE SERVICES, INC.  
YALL RITE LLC DBA GREENLEAF  
RECYCLING

**UNITED STATES BANKRUPTCY JUDGES FOR THE SOUTHERN DISTRICT OF TEXAS (AND KEY STAFF MEMBERS)**

AARON JACKSON  
AKEITA HOUSE  
ANA CASTRO  
JEANNIE CHAVEZ  
JUDGE ALFREDO R. PEREZ  
JUDGE CHRISTOPHER M. LOPEZ  
JUDGE EDUARDO V. RODRIGUEZ  
JUDGE JEFFREY P. NORMAN

JUDGE MARVIN ISGUR  
ROSARIO SALDANA  
SHANNON HOLDEN  
SIERRA THOMAS-ANDERSON  
TRACY CONRAD  
TYLER LAWS  
YESENIA LILA  
NATHAN OCHSNER

**UNITED STATES TRUSTEE FOR THE SOUTHERN DISTRICT OF TEXAS (AND KEY STAFF MEMBERS)**

ALETHEA CALUZA  
ALICIA BARCOMB  
ALINA SAMKO-YU  
ANDREW JIMENEZ  
CHRISTOPHER R. TRAVIS  
CHRISTY SIMMONS  
GLENN OTTO  
GWEN SMITH  
HA NGUYEN  
HECTOR DURAN  
IVETTE GERHARD

JANA WHITWORTH  
JAYSON B. RUFF  
KEVIN M. EPSTEIN  
LINDA MOTTON  
MILLIE APONTE SALL  
RAJALAKSHMI KRISHNAN  
SAMANTHA CHILTON  
SUSAN B. HERSH  
VIANEY GARZA  
YASMINE RIVERA

**EMPLOYEE INSURANCE PROGRAM ADMINISTRATORS**

AMERICAN SPECIALTY HEALTH  
INCORPORATED  
AUTOMATIC DATA PROCESSING, INC.  
BIND BENEFITS, INC. D/B/A SUREST

CBIZ, INC.  
COMPSYCH EMPLOYEE ASSISTANCE  
PROGRAMS, INC.  
ESIS, INC.

HEALTHSMART HOLDINGS INC.  
IMAGINE HEALTH, INC.  
METLIFE, INC.  
OPTUM BANK, INC.  
OPTUMRX, INC.  
PARTNERS DIRECT HEALTH LLC  
THE CIGNA GROUP

TRUDATARX, INC.  
UNITEDHEALTH GROUP  
VERACITY BENEFITS, LLC  
VOYA FINANCIAL, INC.  
WELLFLEET INSURANCE COMPANY  
WEX INC.

**COMPETITORS**

ACCESSCARE  
ALIVI HEALTH  
CALL THE CALL

MEDIDRIVE  
MTM, INC.  
RIDE2MD

**ADVERSE PARTIES IN LITIGATION, ADMINISTRATIVE PROCEEDINGS, AND OTHER LEGAL OR REGULATORY MATTERS**

LAW OFFICES OF DAVID M. GASPARI, P.A.<sup>12</sup>  
PENNSYLVANIA HUMAN RELATIONS  
COMMISSION  
ADRIENNE REED  
ALEXA MORALES  
ALEXIS JONES  
AMERICAN GROUND TRANSPORTATION  
ANDREA HINSON DEANGELO DAVIS  
ANGEL PEREZ  
ARTHUR OWENS  
ASANTA S. BUXTON  
BRANDY CURTIS  
BRENT JOHNSON  
BRITTNEE HARRIS  
CAMECISE METELLUS  
CARLA WILLIAMS  
CHEREDA IVORY  
CHRISTOPHER SMITH  
CLEMMIE WILLIAMS  
COOLYN TURNER  
CYNTHIA BREECE  
DALE FITZ  
DANNY EVANS  
DARYL STOKES  
DAVID PULSIFER  
DAVID T. PATTERSON  
DEBBIE MARIE HOWARD  
DEBRA BURDEN  
DEBRA CHABERT  
DEBRA JONES  
DENISE AVALOS  
DENZELL CARSWELL  
DEXTER SIAS  
DIANA CLAUDIO  
DIANNA GUINYARD  
DINESH KALERA

DOMINICK VITI  
DONNA MAE TOTTY  
DOUGLAS SELBY  
EASTER LYONS  
EDWIN BARROSO-PEREZ  
ELAINE BOWDOIN  
ELIZABETH HERNANDEZ HERRERA  
ELLEN PILLEY  
ELLEN REYES  
FATIMA ZHINDON  
FRANCES DOUGLAS  
GABRIELLA ARCENA DE LOS SANTOS  
GERALDINE NIXON FORD  
GERALDINE ORR  
GWENDOLYN MOBLEY  
HEATHER SWICK  
HELEN D. WALKER  
HOPE SADLER  
IDA WILLIAMS  
INSTANT TRANSPORTATION LLC  
JACQUELINE SISTRUNK  
JAMES A. BATES  
JAMES OLIVER STEPHENS  
JAMES PEREZ  
JAYESON HENRY  
JEFFREY HARRIS  
JESSIE LOVE  
JHOVANNA PARKER  
JIMMY SMITH  
JORGE FURCOY  
KAREN WALTERS  
KENYATTA GODWIN  
LEA'CIMMONE BRIGGS  
LEWIS HAGAR  
LEWIS S. GLASS  
LINDA GANT

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<sup>12</sup> Law firm names appear where an adverse plaintiff's name has been anonymized in court filings.

MAE ROBERTSON  
MARIA J. CAMACHO PINEDA  
MARIANN SCHROEDER  
MARQUIS HINES  
MARTHE PAUL  
MARTIN LUQUE  
MARYANN ORTEGA  
MICHAEL MAVROVITIS  
MODEST KELTRICK  
MOIRA SANDROCK  
NHI NGU  
NICHOLAS GARZA  
NILSA TORRES  
NORMAN FISHBEIN  
ORLANDO CLARK  
QADRIYYAH HILL  
RACHEL CORBETT  
RAPHAEL CRAWFORD  
READING METRO, LLC  
ROBERT KLEBETZ  
ROBERT L. FREIDMAN  
ROBERT SMITH  
ROBERTA GWIN  
RODRICK HACKWORTH  
RONALD HINES  
RONNIE HUNT  
RUTH OLIVER  
RYAN MARTIN  
SADIE DONNELL

SADIE DONNELL CHRISTOPHER SMITH  
SALLY TRIANO  
SANDRA PADILLA HERNANDEZ  
SANTA GUERRERO  
SEINI IKA  
SENIORCARE EMERGENCY MEDICAL  
SERVICES, INC.  
SHABANA HAFIZ  
SHAUNTALAY MCCLENDON  
SHAWN MEADOWS  
SHOOSHANIK CHARKHCHIAN  
SONYA ROSS  
STACIE ROGERS  
SUFUNDA SAMUEL  
SUZANNE BETTS  
SUZIE PLUMAJ  
TERENCE WHITE  
TERRENCE CORA  
THERESA HENRY  
THERESA LYONS  
TINA HAGER  
TRINIDAD DE LA CRUZ  
VEDA ROBERSON  
VINCENT STALEY  
WILLARD MCCLAM  
WILLIE CROMARTIE  
ZANE WHITFIELD

**GOVERNMENT AUTHORITIES AND TAX COLLECTORS**

ABINGTON MUNICIPAL TAX COLLECTOR  
ABINGTON TOWNSHIP TAX OFFICE  
ALABAMA DEPARTMENT OF REVENUE  
ALBEMARLE COUNTY TAX COLLECTOR  
ALEXANDRIA FINANCE DEPARTMENT  
ALIEF ISD TAX OFFICE  
AMERICAN FINANCIAL CREDIT SERVICES,  
INC.  
AMESBURY MUNICIPAL TAX COLLECTOR  
ANSONIA CITY TAX COLLECTOR  
ARIZONA DEPARTMENT OF REVENUE  
ARKANSAS DEPARTMENT OF FINANCE AND  
ADMINISTRATION  
ARKANSAS DEPT. OF FINANCE AND  
ADMINISTRATION  
ASOTIN COUNTY TAX COLLECTOR  
ATTLEBORO MUNICIPAL TAX COLLECTOR  
BEAUFORT COUNTY TREASURER  
BELL COUNTY  
BENTON COUNTY TAX COLLECTOR  
BERKHEIMER TAX ADMINISTRATOR  
BERKS COUNTY TAX COLLECTION  
COMMITTEE  
BERLIN MUNICIPAL TAX COLLECTOR

BERNALILLO COUNTY TAX COLLECTOR  
BEXAR COUNTY TAX ASSESSOR-COLLECTOR  
BOSSIER PARISH SHERIFF  
BOSTON ASSESSING DEPARTMENT  
BOURNE MUNICIPAL TAX COLLECTOR  
BRAINTREE MUNICIPAL TAX COLLECTOR  
BRANFORD TOWN TAX COLLECTOR  
BRAZORIA COUNTY TAX OFFICE  
BRAZOS COUNTY TAX OFFICE  
BRIDGEPORT CITY TAX COLLECTOR  
BRISTOL CITY TAX COLLECTOR  
BROCKTON MUNICIPAL TAX COLLECTOR  
BROOKFIELD TOWN TAX COLLECTOR  
BRUNSWICK COUNTY TAX COLLECTOR  
BURLINGTON MUNICIPAL TAX COLLECTOR  
BURNET COUNTY TAX ASSESSOR-  
COLLECTOR  
CALIFORNIA DEPARTMENT OF TAX AND FEE  
ADMINISTRATION (CDTFA)  
CALIFORNIA FRANCHISE TAX BOARD  
CAMERON COUNTY TAX ASSESSOR-  
COLLECTOR  
CANTON TOWN TAX COLLECTOR  
CHELAN COUNTY TAX COLLECTOR

CHESAPEAKE CITY TAX COLLECTOR  
CHESHIRE TOWN TAX COLLECTOR  
CHESTERFIELD COUNTY TAX COLLECTOR  
CITY OF HOLYOKE TAX COLLECTOR  
CITY OF MCALLEN  
CITY OF NORTH HAVEN TAX COLLECTOR  
CITY OF SAVANNAH, GEORGIA  
CITY OF WORCESTER TAX COLLECTOR  
CLALLAM COUNTY TAX COLLECTOR  
CLARK COUNTY TREASURER'S OFFICE  
CLINTON TOWN TAX COLLECTOR  
COLCHESTER TOWN TAX COLLECTOR  
COLLIN COUNTY TAX ASSESSOR-  
COLLECTOR  
COLONIAL HEIGHTS CITY TAX COLLECTOR  
COLORADO DEPARTMENT OF REVENUE  
COMAL COUNTY TAX ASSESSOR-  
COLLECTOR  
COMPTROLLER OF MARYLAND, REVENUE  
ADMINISTRATION DIVISION  
CONNECTICUT DEPARTMENT OF REVENUE  
SERVICES  
CONTRA COSTA COUNTY TAX COLLECTOR  
COWLITZ COUNTY TAX COLLECTOR  
CROMWELL TOWN TAX COLLECTOR  
CULPEPER TOWN TAX COLLECTOR  
CYPRESS-FAIRBANKS ISD TAX ASSESSOR-  
COLLECTOR  
D.C. OFFICE OF TAX AND REVENUE  
DALLAS COUNTY TAX ASSESSOR-  
COLLECTOR  
DANBURY CITY TAX COLLECTOR  
DANVILLE CITY TAX COLLECTOR  
DARTMOUTH MUNICIPAL TAX COLLECTOR  
DELAWARE DEPARTMENT OF FINANCE  
DELAWARE DIVISION OF CORPORATIONS  
DELAWARE DIVISION OF CORPORATIONS  
(DEPT OF REVENUE)  
DENTON COUNTY TAX ASSESSOR-  
COLLECTOR  
DENVER TREASURY DIVISION  
DESOTO COUNTY TAX COLLECTOR  
DISTRICT OF COLUMBIA OFFICE OF TAX AND  
REVENUE  
DONA ANA COUNTY TAX COLLECTOR  
DOUGLAS COUNTY TAX COMMISSIONER  
EAST HAMPTON TOWN TAX COLLECTOR  
EAST HAVEN TOWN TAX COLLECTOR  
EAST LYME TOWN TAX COLLECTOR  
ECTOR COUNTY TAX ASSESSOR-COLLECTOR  
EL PASO COUNTY TAX ASSESSOR-  
COLLECTOR  
ELLIS COUNTY TAX OFFICE  
ERATH COUNTY TAX ASSESSOR-COLLECTOR  
FAIRFIELD TOWN TAX COLLECTOR  
FAIRHAVEN MUNICIPAL TAX COLLECTOR

FIRST COLONY L.I.D  
FLORENCE COUNTY TREASURER'S OFFICE  
FLORIDA DEPARTMENT OF REVENUE  
FLUVANNA COUNTY TAX COLLECTOR  
FORREST COUNTY TAX COLLECTOR  
FRAMINGHAM MUNICIPAL TAX COLLECTOR  
FRANKLIN COUNTY TAX COLLECTOR  
FREDERICK COUNTY TAX COLLECTOR  
FREDERICKSBURG CITY TAX COLLECTOR  
FREETOWN MUNICIPAL TAX COLLECTOR  
GALVESTON COUNTY TAX OFFICE  
GEORGETOWN COUNTY TREASURER  
GEORGIA DEPARTMENT OF REVENUE  
GLASTONBURY TOWN TAX COLLECTOR  
GLOUCESTER COUNTY TAX COLLECTOR  
GRANBY TOWN TAX COLLECTOR  
GRANT COUNTY TREASURER'S OFFICE  
GRAYS HARBOR COUNTY TAX COLLECTOR  
GROTON TOWN TAX COLLECTOR  
HAMPTON CITY TAX COLLECTOR  
HANOVER COUNTY TREASURER  
HARRIS COUNTY TAX ASSESSOR-  
COLLECTOR  
HARRISON COUNTY TAX COLLECTOR  
HARTFORD CITY TAX COLLECTOR  
HARWICH MUNICIPAL TAX COLLECTOR  
HAWAII DEPARTMENT OF TAXATION  
HAYS COUNTY TAX ASSESSOR-COLLECTOR  
HENRICO COUNTY TAX COLLECTOR  
HIDALGO COUNTY TAX ASSESSOR-  
COLLECTOR  
HINDS COUNTY TAX COLLECTOR  
HOLYOKE MUNICIPAL TAX COLLECTOR  
HOPEWELL CITY TAX COLLECTOR  
HUMBLE ISD TAX OFFICE  
IDAHO STATE TAX COMMISSION  
ILLINOIS DEPARTMENT OF REVENUE  
INDIANA DEPARTMENT OF REVENUE  
IOWA DEPARTMENT OF REVENUE  
ISLAND COUNTY TAX COLLECTOR  
ISLE OF WIGHT COUNTY TAX COLLECTOR  
JAMES CITY COUNTY TAX COLLECTOR  
JEFFERSON COUNTY TAX ASSESSOR-  
COLLECTOR  
JOHNSTON COUNTY TAX OFFICE  
JOHNSTON COUNTY TREASURER  
KANSAS DEPARTMENT OF HEALTH AND  
ENVIRONMENT  
KANSAS DEPARTMENT OF REVENUE  
KENTUCKY DEPARTMENT OF REVENUE  
KING COUNTY TAX COLLECTOR  
KITSAP COUNTY TAX COLLECTOR  
LACLEDE COUNTY TAX COLLECTOR  
LAMAR COUNTY TAX COLLECTOR  
LAREDO ISD TAX OFFICE  
LAUDERDALE COUNTY TAX COLLECTOR

LEE COUNTY TAX COLLECTOR  
LEFLORE COUNTY ASSESSOR  
LOS ANGELES COUNTY TAX COLLECTOR  
LOUDOUN COUNTY TAX COLLECTOR  
LOUISIANA DEPARTMENT OF REVENUE  
LUBBOCK COUNTY TAX ASSESSOR-  
COLLECTOR  
LYNCHBURG CITY TAX COLLECTOR  
MADISON TOWN TAX COLLECTOR  
MAINE REVENUE SERVICES  
MANATEE COUNTY TAX COLLECTOR  
MANCHESTER TOWN TAX COLLECTOR  
MARICOPA COUNTY TREASURER  
MARIN COUNTY TAX COLLECTOR  
MARYLAND COMPTROLLER OF THE  
TREASURY  
MARYLAND DEPT OF ASSESSMENTS &  
TAXATION  
MASON COUNTY TREASURER  
MASSACHUSETTS DEPARTMENT OF  
REVENUE  
MERIDEN CITY TAX COLLECTOR  
MICHIGAN DEPARTMENT OF TREASURY  
MIDDLETOWN CITY TAX COLLECTOR  
MILFORD CITY TAX COLLECTOR  
MILFORD MUNICIPAL TAX COLLECTOR  
MINNESOTA DEPARTMENT OF REVENUE  
MISSISSIPPI DEPARTMENT OF REVENUE  
MISSOURI DEPARTMENT OF REVENUE  
MODIOHEALTH, INC.  
MONROE TOWN TAX COLLECTOR  
MONTANA DEPARTMENT OF REVENUE  
MONTGOMERY COUNTY TAX ASSESSOR-  
COLLECTOR  
NAUGATUCK CITY TAX COLLECTOR  
NEBRASKA DEPARTMENT OF REVENUE  
NEW BRITAIN CITY TAX COLLECTOR  
NEW FAIRFIELD TOWN TAX COLLECTOR  
NEW HAMPSHIRE DEPARTMENT OF  
REVENUE ADMINISTRATION  
NEW HAVEN CITY TAX COLLECTOR  
NEW JERSEY DEPARTMENT OF THE  
TREASURY  
NEW JERSEY DIVISION OF TAXATION  
NEW MEXICO DEPARTMENT OF  
TRANSPORTATION  
NEW MEXICO PUBLIC REGULATION  
COMMISSION  
NEW MEXICO TAXATION AND REVENUE  
DEPARTMENT  
NEW MILFORD TOWN TAX COLLECTOR  
NEW YORK CITY DEPARTMENT OF FINANCE  
NEW YORK STATE DEPARTMENT OF  
TAXATION AND FINANCE  
NEWINGTON TOWN TAX COLLECTOR  
NEWPORT NEWS CITY TAX COLLECTOR

NEWTON MUNICIPAL TAX COLLECTOR  
NEWTOWN TOWN TAX COLLECTOR  
NORFOLK CITY TAX COLLECTOR  
NORTH ADAMS MUNICIPAL TAX COLLECTOR  
NORTH ANDOVER MUNICIPAL TAX  
COLLECTOR  
NORTH BRANFORD TOWN TAX COLLECTOR  
NORTH CAROLINA DEPARTMENT OF  
REVENUE  
NORTH HAVEN TOWN TAX COLLECTOR  
NORTHBOROUGH MUNICIPAL TAX  
COLLECTOR  
NORTON CITY TAX COLLECTOR  
NORWALK CITY TAX COLLECTOR  
NORWICH CITY TAX COLLECTOR  
NUECES COUNTY TAX ASSESSOR-  
COLLECTOR  
OAK PARK CITY TREASURER (OAKLAND)  
OFFICE OF LONG-TERM LIVING  
OHIO DEPARTMENT OF TAXATION  
OKANOGAN COUNTY TAX COLLECTOR  
OKLAHOMA TAX COMMISSION  
OLD SAYBROOK TOWN TAX COLLECTOR  
ONslow COUNTY TAX COLLECTOR  
ORANGE COUNTY TAX COLLECTOR  
ORANGE TOWN TAX COLLECTOR  
OREGON DEPARTMENT OF REVENUE  
ORLEANS MUNICIPAL TAX COLLECTOR  
PARKER COUNTY APPRAISAL DISTRICT  
PENNSYLVANIA DEPARTMENT OF REVENUE  
PETERSBURG, VIRGINIA, COMMISSIONER OF  
THE REVENUE  
PIERCE COUNTY TAX COLLECTOR  
PIMA COUNTY TREASURER  
PITTSFIELD MUNICIPAL TAX COLLECTOR  
POQUOSON CITY TAX COLLECTOR  
PORTSMOUTH CITY TAX COLLECTOR  
POTTER COUNTY TAX ASSESSOR-  
COLLECTOR  
POTTSVILLE CITY HALL  
PUTNAM TOWN TAX COLLECTOR  
RANKIN COUNTY TAX COLLECTOR  
REEVES COUNTY APPRAISAL DISTRICT  
RHODE ISLAND DIVISION OF TAXATION  
RICHMOND CITY TAX COLLECTOR  
RIDGEFIELD TOWN TAX COLLECTOR  
ROANOKE CITY TAX COLLECTOR  
ROCKY HILL TOWN TAX COLLECTOR  
RUTHERFORD COUNTY TAX COLLECTOR  
SAN DIEGO COUNTY TAX COLLECTOR  
SAN MATEO COUNTY TAX COLLECTOR  
SANDWICH MUNICIPAL TAX COLLECTOR  
SAULT SAINTE MARIE CITY TREASURER  
(CHIPPEWA)  
SEYMOUR TOWN TAX COLLECTOR



SHELBY COUNTY OCCUPATIONAL LICENSE  
FEE OFFICE  
SHELTON CITY TAX COLLECTOR  
SIMSBURY TOWN TAX COLLECTOR  
SOLANO COUNTY TREASURY  
SOUTH CAROLINA  
SOUTH CAROLINA DEPARTMENT OF  
REVENUE  
SOUTHBURY TOWN TAX COLLECTOR  
SOUTHINGTON TOWN TAX COLLECTOR  
SPOKANE COUNTY TAX COLLECTOR  
SPOTSYLVANIA COUNTY TAX COLLECTOR  
SPRING ISD TAX OFFICE  
SPRINGFIELD CITY TAX COLLECTOR  
STAFFORD COUNTY TAX COLLECTOR  
STAMFORD CITY TAX COLLECTOR  
STANISLAUS COUNTY TREASURER-TAX  
COLLECTOR  
STRATFORD TOWN TAX COLLECTOR  
SWAMPSCOTT MUNICIPAL TAX COLLECTOR  
TARRANT COUNTY TAX ASSESSOR-  
COLLECTOR  
TAYLOR COUNTY TAX COLLECTOR  
TENNESSEE DEPARTMENT OF REVENUE  
TEXAS COMPTROLLER OF PUBLIC  
ACCOUNTS  
TEXAS CONTROLLER OF PUBLIC ACCOUNTS  
TEXAS DEPARTMENT OF LICENSING AND  
REGULATION  
THE AGENCY FOR HEALTH CARE  
ADMINISTRATION  
THURSTON COUNTY TAX COLLECTOR  
TOM GREEN COUNTY APPRAISAL DISTRICT  
TOMBALL ISD TAX OFFICE  
TORRINGTON CITY TAX COLLECTOR  
TOWN OF BRATTLEBORO  
TOWNSHIP OF NEPTUNE NEW JERSEY

TRAVIS COUNTY TAX ASSESSOR-  
COLLECTOR  
TREASURER-STATE OF NEW JERSEY  
TRUMBULL TOWN TAX COLLECTOR  
U.S. DEPARTMENT OF THE TREASURY  
UTAH STATE TAX COMMISSION  
VERMONT DEPARTMENT OF TAXES  
VERNON TOWN TAX COLLECTOR  
VIRGINIA DEPARTMENT OF TAXATION  
WALLA WALLA COUNTY TAX COLLECTOR  
WALLINGFORD TOWN TAX COLLECTOR  
WARREN COUNTY TAX COLLECTOR  
WASHINGTON DEPARTMENT OF REVENUE  
WATER VALLEY CITY TAX COLLECTOR  
WATERBURY CITY TAX COLLECTOR  
WATERFORD TOWN TAX COLLECTOR  
WATERTOWN TOWN TAX COLLECTOR  
WEBB COUNTY TAX ASSESSOR-COLLECTOR  
WEST HAVEN CITY TAX COLLECTOR  
WEST VIRGINIA STATE TAX DEPARTMENT  
WESTPORT TOWN TAX COLLECTOR  
WETHERSFIELD TOWN TAX COLLECTOR  
WHATCOM COUNTY TAX COLLECTOR  
WICHITA COUNTY TAX ASSESSOR-  
COLLECTOR  
WILLIAMSON COUNTY TRUSTEE'S OFFICE  
WILSON COUNTY TRUSTEE  
WILTON TOWN TAX COLLECTOR  
WINCHESTER TOWN TAX COLLECTOR  
WINDHAM TOWN TAX COLLECTOR  
WINDSOR TOWN TAX COLLECTOR  
WINTERVILLE CITY TAX COLLECTOR  
WISCONSIN DEPARTMENT OF REVENUE  
WOBURN MUNICIPAL TAX COLLECTOR  
WOLCOTT TOWN TAX COLLECTOR  
YAKIMA COUNTY TAX COLLECTOR  
YALOBUSHA COUNTY TAX COLLECTOR  
YORK COUNTY TAX COLLECTOR

**SCHEDULE 2****White & Case's Relationships with Potential Parties in Interest**

<b>Category</b>	<b>Name</b>	<b>Open/ Close</b>
Bondholders	Alliancebernstein Holding Lp	Open
Insurance Parties	Alliant Insurance Services, Inc.	Open
Insurance Parties	Allianz Global Risks Us Insurance Company	Open
Top 30 Unsecured Creditors	Amazon Web Services, Inc.	Open
Major Suppliers and Vendors	American Express	Open
Surety Bond Issuers & Beneficiaries	Amerigroup Partnership Plan, Llc	Open
Utilities	AT&T	Open
Utilities	AT&T Mobility	Open
Employee Insurance Program Administrators	Automatic Data Processing, Inc.	Closed
Trustees, Agents, Secured Lenders, and Potential Lienholders	Bank of America, N.A.	Open
Trustees, Agents, Secured Lenders (including certain Bond Holders), and Other Potential Lienholders	Barclays Bank Plc	Open
Trustees, Agents, Secured Lenders, and Potential Lienholders	Beach Point Capital Management	Open
Bondholders	Blackrock	Open
Trustees, Agents, Secured Lenders (including certain Bond Holders), and Other Potential Lienholders	BNP Paribas S.A.	Open
Trustees, Agents, Secured Lenders, and Potential Lienholders	Brigade Capital Management	Open
Bondholders	Canadian Imperial Bank	Open
Trustees, Agents, Secured Lenders, and Potential Lienholders	CIBC Bank Usa	Closed
Debtors' Banks	Citizens Bank, N.A.	Open
Major Equity Holders	Coliseum Capital Management, Llc	Closed
Utilities	Comcast	Open
Trustees, Agents, Secured Lenders, and Potential Lienholders	Comerica Bank	Open
Major Equity Holders Trustees, Agents, Secured Lenders (including certain Bond Holders), and Other Potential Lienholders Trustees, Agents, Secured Lenders, and Potential Lienholders	D.E. Shaw & Co	Closed
Trustees, Agents, Secured Lenders, and Potential Lienholders	Deutsche Bank Ag New York Branch	Open
Surety Bond Issuers & Beneficiaries	Elevance Health, Inc.	Open
Employee Insurance Program Administrators	Esis, Inc.	Open
Trustees, Agents, Secured Lenders (including certain Bond Holders), and Other Potential Lienholders	Fiam LLC An Affiliate Of Fidelity Investments	Open
Insurance Parties	Fireman's Fund Insurance Company (Allianz)	Open
Insurance Parties	Fireman's Fund Insurance Company	Open
Utilities	Firstenergy Corp	Open
Trustees, Agents, Secured Lenders, and Potential Lienholders	Hewlett-Packard Financial Services Company	Closed
Trustees, Agents, Secured Lenders, and Potential Lienholders	Hg Vora Capital Management	Open
Trustees, Agents, Secured Lenders (including certain Bond Holders), and Other Potential Lienholders	HSBC Bank Plc	Open
Debtors' Banks	HSBC Holdings Plc.	Open
Landlords	Huron Group Inc	Closed
Utilities	Iron Mountain	Open
Utilities	Iron Mountain Incorporated	Open



Trustees, Agents, Secured Lenders, and Potential Lienholders	Jefferies Finance LLC	Open
Trustees, Agents, Secured Lenders, and Potential Lienholders	JP Morgan Chase Bank, N.A.	Open
Trustees, Agents, Secured Lenders (including certain Bond Holders), and Other Potential Lienholders	Jupiter Asset Management	Closed
Trustees, Agents, Secured Lenders, and Potential Lienholders	Keybank, National Association	Open
Debtors' Ordinary Course Professionals	KPMG LLP	Open
Professionals for Other Major Stakeholders	Lazard Freres & Co. LLC	Closed
Employee Insurance Program Administrators	Metlife, Inc.	Open
Utilities	Monongahela Power Co	Open
Debtors' Banks	Morgan Stanley	Open
Utilities	National Grid	Closed
Insurance Parties	National Union Fire Insurance Company Of Pittsburgh, Pa. (AIG)	Closed
Trustees, Agents, Secured Lenders, and Potential Lienholders	Neuberger Berman Group	Open
Utilities	Nyseg	Closed
Surety Bond Issuers & Beneficiaries	Oklahoma Complete Health, Inc. C/O Centene Corporation	Open
Utilities	Pennsylvania Electric Company	Open
Debtors' Banks	PNC Bank, N.A.	Closed
Debtors' Ordinary Course Professionals	Pricewaterhouse Coopers LLP	Open
Trustees, Agents, Secured Lenders, and Potential Lienholders	Redwood Capital Management	Closed
Landlords	Regus	Open
Major Suppliers and Vendors	Salesforce.Com Inc	Open
Bondholders	State Street	Open
Trustees, Agents, Secured Lenders, and Potential Lienholders	Sumitomo Mitsui Banking Corporation	Open
Bondholders	Tcw Group	Open
Trustees, Agents, Secured Lenders, and Potential Lienholders		
Major Equity Holders	The Vanguard Group, Inc.	Open
Insurance Parties	Travelers Casualty And Surety Company Of America	Closed
Surety Bond Issuers & Beneficiaries		
Trustees, Agents, Secured Lenders, and Potential Lienholders	Truist Bank	Open
Debtors' Banks	Truist Financial Corporation	Open
Debtors' Banks	U.S. Bancorp	Closed
Employee Insurance Program Administrators	Voya Financial, Inc.	Open
Debtors' Banks	Wells Fargo Bank, N.A.	Open
Trustees, Agents, Secured Lenders, and Potential Lienholders		
Surety Bond Issuers & Beneficiaries	Westchester Fire Insurance Company	Closed
Top 30 Unsecured Creditors	Wilmington Savings Fund Society, Fsb	Open
Trustees, Agents, Secured Lenders (including certain Bond Holders), and Other Potential Lienholders	Wilmington Trust	Open
Major Suppliers and Vendors	Workday Inc	Open
Top 30 Unsecured Creditors	WSFS Bank	Closed
Insurance Parties	XI Specialty Insurance Company	Closed

**EXHIBIT C**

**Committee Declaration**

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

In re

MODIVCARE INC., et al.,<sup>1</sup>

Debtors.

Chapter 11

Case No. 25-90309 (ARP)

(Jointly Administered)

**DECLARATION OF DAVID ROWE  
IN SUPPORT OF APPLICATION OF THE OFFICIAL  
COMMITTEE OF UNSECURED CREDITORS FOR ENTRY OF AN  
ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF  
WHITE & CASE LLP AS COUNSEL EFFECTIVE AS OF SEPTEMBER 9, 2025**

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Pursuant to 28 U.S.C. § 1746, I, David Rowe, as an authorized signatory of Jupiter Asset Management, chairperson of the Official Committee of Unsecured Creditors (the “**Committee**”) hereby declare, as follows:

1. I am an authorized representative of Jupiter Asset Management. Jupiter Asset Management is an unsecured creditor of the Debtors and a member of the Committee appointed in the above-captioned chapter 11 cases. I submit this declaration (the “**Declaration**”) in support of the *Application of the Official Committee of Unsecured Creditors for Entry of an Order Authorizing the Employment and Retention of White & Case LLP as Counsel Effective as of*

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<sup>1</sup> A complete list of each of the Debtors in the 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’ proposed 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.

September 9, 2025 (the “**Application**”).<sup>2</sup> I have reviewed and am familiar with the Application. I am in all respects competent to make this Declaration in support of the Application. Except as otherwise noted, I have personal knowledge as to all the information set forth below.

**IDENTITY OF DECLARANT**

2. On August 20, 2025 (the “**Petition Date**”), the Debtors filed with the Court a voluntary petition for relief under the Bankruptcy Code. The Debtors continue to operate their businesses and manage their properties as debtors-in-possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code. No trustee or examiner has been appointed in these Chapter 11 Cases.

3. On September 5, 2025, the Office of the United States Trustee for Region 7 (the “**U.S. Trustee**”) appointed the Committee, pursuant to section 1102(a) of the Bankruptcy Code, to represent the interests of all creditors holding unsecured claims in these Chapter 11 Cases. [Docket No. 124]. As of the date hereof, the members of the Committee are: (i) Wilmington Savings Fund Society, FSB, as indenture trustee for the Unsecured Notes;<sup>3</sup> (ii) Madison Avenue International LP; (iii) Jupiter Asset Management; (iv) Uber Health, LLC; (v) MedEx Medical Transport Service, Inc.; (vi) Randstad North America; and (vii) Marquis Hines.

4. On September 9, 2025, the Committee voted to retain White & Case as its counsel, subject to Bankruptcy Court approval. As a representative of a member of the Committee, I was directly involved in the decision to retain White & Case as the Committee’s counsel in these

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<sup>2</sup> Capitalized terms used but not otherwise herein defined shall have the meanings ascribed to such terms in the Application.

<sup>3</sup> On August 24, 2021, Debtor ModivCare Escrow Issuer, Inc. issued \$500 million aggregate principal amount of 5.00% senior unsecured notes due October 1, 2029 (the “**Unsecured Notes**”).

Chapter 11 Cases and actively participated in negotiating the terms of White & Case's employment.

**STEPS TAKEN TO ENSURE COMPARABILITY OF  
ENGAGEMENT TERMS AND RATE STRUCTURE**

5. I have confirmed with White & Case that, while its billing rates vary among attorneys based on the attorney's seniority and position with the firm (e.g., partner, counsel, associate), years of experience, and the demand for services in the attorney's particular area of expertise, its billing rates do not vary as a function of whether the services performed relate to a bankruptcy engagement or a nonbankruptcy engagement.

6. White & Case has informed the Committee that its rates for bankruptcy representations are consistent with and comparable to the rates White & Case charges for nonbankruptcy representations. White & Case has informed the Committee that its current hourly rates apply to non-bankruptcy services, if any, provided by the Firm, unless an alternative fee arrangement (such as a contingent fee, mixed contingent fee, flat fee, or blended rate arrangement) is agreed upon. White & Case has informed the Committee that its attorneys will not charge a premium or in any way increase their hourly rates over the fees charged to nonbankruptcy clients.

7. The Committee is satisfied that White & Case has set its hourly rates for its attorneys and paraprofessionals at comparable levels to those charged by its competitor firms. Based on these representations and the Committee members' experience in both the bankruptcy field and in other fields in which the Debtors operate, I believe these rates are reasonable.

**SELECTION OF WHITE & CASE AS COMMITTEE COUNSEL**

8. On or about September 5, 2025, the Committee decided to retain counsel. After careful consideration, the Committee selected White & Case to serve as its counsel based upon White & Case's expertise in cases such as these Chapter 11 Cases. The Committee found that

White & Case is well suited to represent the Committee in these Chapter 11 Cases based on White & Case's extensive experience in chapter 11 matters, including its experience and knowledge in the areas of debtor's protections, creditors' rights, and business reorganizations under chapter 11 of the Bankruptcy Code.

**OTHER CIRCUMSTANCES WARRANTING WHITE & CASE'S RETENTION**

9. The Committee selected White & Case as counsel because of the firm's extensive restructuring experience and knowledge in the field of debtors' and creditors' rights and business reorganizations under chapter 11 of the Bankruptcy Code. White & Case also demonstrated its firm-wide connections to jurisdictions in which the Debtors operate globally and its firm-wide experience. White & Case's presentation made clear it is the best suited for providing legal services to the Committee for the duration of these Chapter 11 Cases.

**PROCEDURES ESTABLISHED TO SUPERVISE  
FEES AND EXPENSES AND MANAGE COSTS**

10. Throughout these Chapter 11 Cases, the Committee will supervise White & Case's incurred fees and expenses and review White & Case's monthly invoices and applications for payment of fees and reimbursement of expenses. The Committee understands and consents to the fact that White & Case historically increases its hourly billing rates for its professionals and paraprofessionals on a yearly basis.

11. White & Case has informed me that it will work closely with other professionals that may be retained by the Committee, taking whatever steps are necessary and appropriate to avoid any unnecessary duplication of effort with such other professionals.

12. The Committee understands that White & Case reserves all rights to contest any such objection raised to the allowance or payments of its requested fees and expenses, and the Committee reserves the right to retain conflicts counsel to prosecute any such fee objection.

13. Nothing contained herein is intended to limit White & Case's ability to request allowance and payment of fees and expenses pursuant to sections 330 and 331 of the Bankruptcy Code, to restrict White & Case's right to defend any objection raised to the allowance or payment of such fees, nor to restrict the Committee's right to retain conflicts counsel to prosecute any such fee objection to the extent it is not resolved informally by the parties or raised by another party in interest, such as the U.S. Trustee.

14. Based on the foregoing, I am of the opinion that it is necessary to employ White & Case and that such employment is in the best interest of the Committee.

15. I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information, and belief.

Dated: October 8, 2025

Respectfully submitted,

/s/ David Rowe

Name: David Rowe