

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

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In re: : Chapter 11
: :
MODIVCARE INC., *et al.*, : Case No. 25-90309 (ARP)
: :
Debtors.¹ : (Jointly Administered)
: :
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NOTICE OF FILING OF DEBTORS' AND COMMITTEE'S PROPOSED
CONFIRMATION SCHEDULES

PLEASE TAKE NOTICE that, on August 20, 2025 (the "***Petition Date***"), the above-captioned debtors and debtors-in-possession (collectively, the "***Debtors***") filed voluntary petitions for relief under title 11 of the United States Code (the "***Bankruptcy Code***") in the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the "***Court***") commencing these chapter 11 cases (the "***Chapter 11 Cases***").

PLEASE TAKE FURTHER NOTICE that, in advance of the status conference set for October 10, 2025, at 8:30 a.m. (prevailing Central Time), attached hereto as **Exhibit A** is the Debtors' proposed schedule for confirmation, and attached hereto as **Exhibit B** is the Official Committee of Unsecured Creditor's proposed schedule for confirmation.

[*Remainder of page intentionally left blank.*]

¹ A complete list of each of the Debtors in these 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' 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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Dated: October 9, 2025
Houston, Texas

Respectfully submitted,

/s/ Timothy A. ("Tad") Davidson II

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*Proposed Co-Counsel for the Debtors
and Debtors in Possession*

Certificate of Service

I certify that on October 9, 2025, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

/s/ Timothy A. ("Tad") Davidson II

Timothy A. ("Tad") Davidson II

Exhibit A

(Debtors' Proposed Confirmation Schedule)

Event	Date
Deadline for Debtors to file responses and objections and designate witnesses in response to the Committee's First Requests for the Production of Documents and the 30(b)(6) Deposition Notice served on September 10, 2025	October 10, 2025
Deadline for submission of expert reports	October 17, 2025
Deadline for objecting parties to serve any additional 30(b)(6) or individual deposition notices to the Debtors	October 24, 2025
Deadline for submission of rebuttal expert reports	October 29, 2025
Deadline for the Debtors' substantial completion of document production in response to the Committee's First Requests for the Production of Documents served on September 10, 2025	October 30, 2025
Deadline to file any standing motion	October 30, 2025
Deadline to file preliminary witness lists for the confirmation hearing*	November 3, 2025
Deadline for the substantial conclusion of fact discovery, including any depositions of any witnesses who will testify at confirmation	November 7, 2025
Deadline for expert discovery to conclude	November 7, 2025
Deadline to file responses/objections to any standing motions	November 10, 2025
Hearing on standing motion	Latter half of week of November 10, 2025
Deadline to exchange deposition designations, exhibit lists, and final witness lists* for the confirmation hearing	November 12, 2025
Deadline to file objections and counter-objections to deposition designations and objections to exhibit lists	November 14, 2025
Confirmation Hearing	November 18, 2025

Exhibit B

(Committee's Proposed Confirmation Schedule)

Event	Date
Deadline for Debtors to file responses and objections and designate witnesses in response to the Committee's First Requests for the Production of Documents and the 30(b)(6) Deposition Notice served on September 10, 2025.	October 8, 2025
Deadline for the Debtors' substantial completion of document production in response to the Committee's First Requests for the Production of Documents served on September 10, 2025.	October 10, 2025 or the earlier of a date 28 days before the deadline to object to plan confirmation
Deadline for plan supporters to submit expert reports.	October 10, 2025 or the earlier of a date 28 days before the deadline to object to plan confirmation
Deadline for objecting parties to serve any additional 30(b)(6) or individual deposition notices to the Debtors	October 15, 2025
Deadline for Independent Director to submit his investigation report or findings, to the extent such report or findings will be offered into evidence at the Confirmation Hearing.	October 17, 2025 or the earlier of 21 days before the deadline to object to plan confirmation
Deadline for the conclusion of fact discovery from the Debtors, including the depositions of Debtor witnesses.	October 31, 2025
Deadline to file Plan Supplements	October 31, 2025, at 4:00 p.m. (Central Time)
Deadline to file responses/objections to the Committee's Standing Motions	14 days after the filing of any Standing Motion
Voting Deadline and deadline to return Release Opt-Out Form	November 7, 2025, at 4:00 p.m. (Central Time)
Deadline to file objections to plan confirmation.	November 7, 2025 at 4:00 p.m. (Central Time)
Deadline for objecting parties to serve rebuttal expert reports.	November 7, 2025 at 4:00 p.m. (Central Time)
Deadline for expert discovery to conclude.	November 12, 2025
Deadline to file Confirmation Materials, including a witness and exhibit list	November 14, 2025 at 12:00 p.m. (Central Time)
Confirmation Hearing	November 18, 2025