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

| | | |
|---|---|---|
| In re: | ) | Chapter 11 |
| MODIVCARE INC., *et al.* | ) | Case No. 25-90309 (ARP) |
| Debtors.[1] | ) | (Jointly Administered) |

**DEBTORS' APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF MILLS HALSTEAD ZALOUDEK, LLC AS REAL ESTATE COUNSEL EFFECTIVE AS OF OCTOBER 24, 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 above-captioned debtors and debtors in possession (collectively, the "***Debtors***") respectfully request entry of an order authorizing the Debtors to employ and retain Mills Halstead Zaloudek, LLC ("***Mills***") effective as of October 24, 2025. In support of this application (the "***Application***"), the Debtors rely on and incorporate by reference (a) the declaration of Amanda Halstead, manager of the real estate practice group at Mills Halstead Zaloudek LLC, which is attached hereto as **Exhibit A** (the "***Halstead Declaration***"), and (b) the declaration of Faisal Khan, General Counsel and Secretary of ModivCare Inc., which is attached hereto as **Exhibit B**

[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.

(the "***Retention Declaration***"). In further support of this Application, the Debtors respectfully represent as follows:

## JURISDICTION AND VENUE

1. The United States Bankruptcy Court for the Southern District of Texas (the "***Court***") has jurisdiction to consider this Application pursuant to 28 U.S.C. §§ 157 and 1334. This matter is a core proceeding within the meaning of 28 U.S.C. § 157(b) and this Court may enter a final order consistent with Article III of the United States Constitution.

2. Venue in this district is proper under 28 U.S.C. §§ 1408 and 1409.

3. The statutory and legal predicates for the relief requested herein are section 327(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***"), rules 2014-1 and 2016-1 of the Bankruptcy Local Rules for the Southern District of Texas (the "***Bankruptcy Local Rules***"), and the Procedures for Complex Cases in the Southern District of Texas (the "***Complex Case Procedures***").

## BACKGROUND

4. On August 20, 2025 (the "***Petition Date***"), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code (the "***Chapter 11 Cases***"). The Debtors continue to operate their businesses and manage their properties as debtors in possession under sections 1107(a) and 1108 of the Bankruptcy Code. On September 5, 2025, the Office of the United States Trustee for the Southern District of Texas (the "***U.S. Trustee***") appointed an official committee of unsecured creditors (the "***Committee***") [Docket No. 124]. No request for the appointment of a trustee or an examiner has been made.

5. Additional information regarding the Debtors, including their business operations, their capital and debt structures, and the events up to the filing of the Chapter 11 Cases, is set forth in detail in the *Declaration of Chad J. Shandler in Support of Chapter 11 Petitions and First Day Relief*, filed on the Petition Date [Docket No. 14] (the "***First Day Declaration***").

6. The Chapter 11 Cases are jointly administered for procedural purposes only pursuant to Bankruptcy Rule 1015(b).

## RELIEF REQUESTED

7. The Debtors seek entry of an order (the "***Order***"), substantially in the form attached hereto, authorizing the employment and retention of Mills as real estate counsel for the Debtors, effective as of October 24, 2025, in accordance with and pursuant to the terms and conditions of that certain engagement letter dated September 17, 2025 (the "***Engagement Letter***"), a copy of which is attached as **Exhibit 1** to the Halstead Declaration and incorporated herein by reference.

## MILLS' QUALIFICATIONS

8. Mills is a law firm located at 600 17th Street, Suite 2800 S, Denver, Colorado, 80202-5408. The Debtors seek to retain Mills due to their recognized expertise and extensive experience and knowledge practicing commercial leasing and real estate, and in negotiating and amending lease agreements.

9. The Debtors have selected Mills as their real estate counsel based upon, among other things: (a) the Debtors' need to retain skilled legal counsel to address various real estate matters; and (b) Mills' extensive experience and reputation in drafting and negotiating amendments to lease agreements. An experienced real estate attorney such as Mills fulfills a critical service that complements the services provided by the Debtors' other professionals. Accordingly, the Debtors believe that Mills is well-qualified and able to assist the Debtors in a

cost-effective, efficient, and timely manner, and the employment and retention of Mills is in the best interests of the Debtors and their estates, their creditors, and all parties in interest.

10. Debtors believe that Mills is both well-qualified and uniquely able to represent them in the Chapter 11 Cases and that such representation is critical to the Debtors' efforts to successfully reorganize while maximizing value for their estates.

## SERVICES TO BE PROVIDED

11. The Debtors desire to employ Mills under a general retainer because of, among other reasons, the nature of the legal services that may be required in connection with the Chapter 11 Cases. However, consistent with the Engagement Letter, the Debtors principally expect Mills to assist the Debtors with lease amendments and modifications (the "***Services***").[2]

12. Such professional services are necessary to the Debtors' restructuring efforts and in the ongoing operation and management of the Debtors' businesses while subject to the Bankruptcy Code. Mills has advised the Debtors that it intends to coordinate with the Debtors' other retained professionals to clearly delineate their respective duties in order to prevent duplication of effort whenever possible. The services provided by Mills will complement, and not duplicate, the services to be rendered by any other professional retained in the Chapter 11 Cases. The efficient coordination of the efforts of the Debtors' attorneys and other professionals will greatly add to the effective administration of the Chapter 11 Cases.

## PROFESSIONAL COMPENSATION

13. Mills' decision to advise and assist the Debtors in connection with the Chapter 11 Cases is subject to its ability to be retained in accordance with its customary terms and conditions

[2] The summary of the Engagement Letter in this Application is qualified in its entirety by reference to the provisions of the Engagement Letter. To the extent there is any discrepancy between the summary contained herein and the terms set forth in the Engagement Letter, the terms of the Engagement Letter shall control.

of employment, compensated for its services, and reimbursed for its out-of-pocket expenses it incurs in accordance with its customary billing practices, as set forth in the Engagement Letter.

14. Mills operates in a national marketplace for legal services in which rates are driven by multiple factors relating to the individual lawyer, his or her area of specialization, the firm's expertise, performance, and reputation, the nature of the work involved, and other factors. Mills' hourly rates are designed to compensate Mills fairly for the work of its attorneys and paralegals and to cover fixed and routine overhead expenses.

15. Mills' current hourly rates are set forth in the Halstead Declaration. Hourly rates vary as between the primary attorney responsible and the paralegal responsible for the matter and are subject to periodic adjustments to reflect economic and other conditions.[3] Except as may otherwise be set forth in the Halstead Declaration, Mills did not agree to any variations from, or alternatives to, its standard or customary billing arrangements for this engagement, and none of the Mills professionals included in this engagement will vary his or her rate based on the geographic location of the Chapter 11 Cases.

16. As described in the Retention Declaration, the Debtors have reviewed and approved Mills' standard rate structure and determined that it is appropriate and comparable to (a) the rates that Mills charges for non-bankruptcy representations or (b) the rates of other comparably skilled professionals.

17. Consistent with the Engagement Letter and Mills' policy with respect to its other clients, Mills will continue to charge the Debtors for all services provided and for other charges

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[3] Mills generally increases the hourly billing rate of attorneys and paraprofessionals from time-to-time, typically on January 1 of each calendar year. As set forth in the Order, Mills will provide ten business-days' notice to the Debtors, the U.S. Trustee, and the Creditors' Committee before implementing any periodic increases, and will file any such notice with the Court.

and disbursements incurred in the rendition of services. It is Mills' policy to charge its clients in all areas of practice for identifiable, non-overhead expenses incurred in connection with the client's case that would not have been incurred except for representation of that particular client. It is also Mills' policy to charge its clients only the amount actually incurred by Mills in connection with such items.

18. During the Chapter 11 Cases, Mills will apply to the Court for allowance of compensation for professional services rendered and reimbursement of expenses incurred in the Chapter 11 Cases in accordance with applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Bankruptcy Local Rules, and any orders entered in the Chapter 11 Cases governing professional compensation and reimbursement for services rendered and charges and disbursements incurred. Such applications will constitute a request for interim payment against Mills' reasonable fees and expenses to be determined at the conclusion of the Chapter 11 Cases.

**COMPENSATION FROM THE DEBTORS**

19. The Debtors desire to employ and compensate Mills with reasonable fees to be determined by the Court. No compensation will be paid to Mills except upon compliance with the Bankruptcy Code, Bankruptcy Rules, Local Rules, and any other applicable procedures and orders of this Court. Mills has received no promise of payment other than as set forth herein. The Debtors will be exclusively responsible for paying Mills' Court-approved fees, and neither the Debtors nor their other representatives will have any such responsibility.

**MILLS' DISINTERESTEDNESS**

20. To the best of the Debtors' knowledge, and except as otherwise disclosed in the Halstead Declaration, the partners and paralegals of Mills (a) do not have any connection with any of the Debtors, their affiliates, their creditors, any other party in interest, the U.S. Trustee or any

person employed in the office of the same, or any judge in the United States Bankruptcy Court for the Southern District of Texas or any person employed in the offices of the same; (b) are "disinterested persons," as that term is defined in section 101(14) of the Bankruptcy Code, as modified by section 1107(b) of the Bankruptcy Code; and (c) do not hold or represent any interest adverse to the Debtors' estates; and (d) has no connection to the Debtors, their creditors, or related parties except as may be disclosed in the Halstead Declaration.

21. Given the large number of parties in interest in the Chapter 11 Cases, and despite the efforts to identify and disclose Mills' relationships with parties in interest in the Chapter 11 Cases, Mills is unable to state with certainty that every client relationship or other connection has been disclosed in the Halstead Declaration. The Debtors understand that Mills will continue to conduct periodic conflicts analyses to determine whether it is performing or has performed services for any significant parties in interest in the Chapter 11 Cases and will promptly file a supplemental declaration as required by Bankruptcy Rule 2014(a) to disclose any material developments regarding the Debtors or any other pertinent relationships that come to Mills' attention.

## BASIS FOR RELIEF

### I. The Debtors Should be Permitted to Retain and Employ Mills on the Terms of the Engagement Letter Pursuant to Sections 327 and 328 of the Bankruptcy Code.

22. The Debtors seek retention and employment of Mills as their real estate counsel pursuant to section 327(a) of the Bankruptcy Code, which provides that a debtor, subject to Court approval:

> [M]ay employ one or more attorneys, accountants, appraisers, auctioneers, or other professional persons, that do not hold or represent an interest adverse to the estate, and that are disinterested

> persons, to represent or assist the [debtor] in carrying out the [debtor]'s duties under this title.

11 U.S.C. § 327(a).

23. Bankruptcy Rule 2014(a) requires that an application for retention include:

> [S]pecific facts showing the necessity for the employment, the name of the [firm] to be employed, the reasons for the selection, the professional services to be rendered, any proposed arrangement for compensation, and, to the best of the applicant's knowledge, all of the [firm's] connections with the debtor, creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee.

Fed. R. Bankr. P. 2014.

24. The Debtors submit that for the reasons stated above and in the Retention Declaration and the Halstead Declaration, the retention and employment of Mills is necessary and in the best interest of the Debtors, their estates, and their creditors and should be approved. Further, as stated in the Halstead Declaration, Mills is a "disinterested person" within the meaning of section 101(14) of the Bankruptcy Code, as required by section 327(a) of the Bankruptcy Code, and Mills does not hold or represent an interest adverse to the Debtors' estates and has no connection to the Debtors, their creditors, or other parties in interest.

25. Mills commenced its work for the Debtors no earlier than October 24, 2025 and this Application is being filed within 30 days of that date. Therefore, pursuant to Bankruptcy Local Rule 2014-1 and paragraph 47 of the Complex Case Procedures, this Application is deemed contemporaneous with such date. *See* BLR 2014-1(b)(1) ("If an application for approval of the employment of a professional is made within 30 days of the commencement of that professional's provision of services, it is deemed contemporaneous."); Complex Case Procedures ¶ 47.

## NOTICE

26. Notice of this Application will be given to the parties on the Debtors' Master Service List. A copy of this Application is available on (a) the Court's website, at www.txs.uscourts.gov and (b) the website maintained by the Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global, at https://www.veritaglobal.net/ModivCare.

**WHEREFORE** the Debtors request that the Court enter the proposed Order granting the relief requested in this Application and such other and further relief as the Court may deem just and proper.

Dated: October 24, 2025

*/s/ Faisal Khan*
Name: Faisal Khan
Title: General Counsel & Secretary
ModivCare Inc.

**Certificate of Service**

I certify that on October 24, 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

## Halstead Declaration

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

| | | |
|---|---|---|
| In re: | ) | Chapter 11 |
| MODIVCARE INC., *et al.* | ) | Case No. 25-90309 (ARP) |
| Debtors.[1] | ) | (Jointly Administered) |

**DECLARATION OF AMANDA HALSTEAD IN SUPPORT OF DEBTORS' APPLICATION FOR ENTRY OF AN ORDER AUTHORIZING THE EMPLOYMENT AND RETENTION OF MILLS HALSTEAD ZALOUDEK, LLC AS REAL ESTATE COUNSEL EFFECTIVE AS OF OCTOBER 24, 2025**

I, Amanda Halstead, declare as follows:

1. I am the Manager of the real estate practice group in the law firm of Mills Halstead Zaloudek, LLC ("***Mills***"), a law firm located in Denver, Colorado. I am admitted in, practicing in, and a member in good standing of the state bar of Colorado, and there are no disciplinary proceedings pending against me. I am over the age of eighteen, am authorized to submit this declaration, and am competent to testify on the matters contained herein.

2. I submit this declaration to provide disclosure in connection with the *Debtors' Application for Entry of an Order Authorizing the Employment of Mills Halstead Zaloudek, LLC as Real Estate Counsel Effective as of October 24, 2025* (the "***Application***")[2], by which the above-

[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.

[2] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Application.

captioned debtors and debtors-in-possession (together, the "***Debtors***") seek authority to employ and retain Mills as real estate counsel effective as of October 24, 2025.

3. Except as otherwise indicated, all facts set forth in this declaration are based upon my personal knowledge, information supplied to me by other Mills professionals or paraprofessionals, or learned from my review of relevant documents. To the extent any information disclosed herein requires amendment or modification as additional information becomes available to Mills, a supplemental declaration will be submitted to this Court reflecting such amended or modified information.

## SERVICES TO BE PROVIDED

27. The Debtors desire to employ Mills under a general retainer because of, among other reasons, the nature of the legal services that may be required in connection with the Chapter 11 Cases. However, consistent with the Engagement Letter, the Debtors principally expect Mills to assist the Debtors with lease negotiations, lease amendments and modifications (the "***Services***").

28. I believe these professional services are necessary to the Debtors' restructuring efforts and in the ongoing operation and management of the Debtors' businesses while subject to the Bankruptcy Code. Further, if the Debtors request Mills perform services not contemplated by the Engagement Letter, Mills and the Debtors will agree, in writing, on the terms for such services and seek the Court's approval. I believe that the employment of Mills is important to enable the Debtors to execute their duties as debtors in possession and to effectuate their reorganization efforts.

29. Mills has advised the Debtors that it intends to coordinate with the Debtors' other retained professionals to clearly delineate their respective duties in order to prevent duplication of effort whenever possible. The services provided by Mills will complement, and not duplicate, the services to be rendered by any other professional retained in the Chapter 11 Cases. The efficient

coordination of the efforts of the Debtors' attorneys and other professionals will greatly add to the effective administration of the Chapter 11 Cases.

**PROFESSIONAL COMPENSATION**

30. Mills intends to apply to the Court for allowance of compensation for professional services rendered and reimbursement of expenses incurred in connection with the Chapter 11 Cases in compliance with sections 330 and 331 of the Bankruptcy Code and applicable provisions of the Bankruptcy Rules, the Bankruptcy Local Rules, and any procedures and orders of the Court.

31. Mills operates in a national marketplace for legal services in which rates are driven by multiple factors relating to the individual lawyer, his or her area of specialization, the firm's expertise, performance, and reputation, the nature of the work involved, and other factors. Mills' hourly rates are designed to compensate Mills fairly for the work of its attorneys and paralegals and to cover fixed and routine overhead expenses. My current hourly rate for the Chapter 11 Cases is $450.00 and the hourly rate for Mills' paralegals is $135.00.

32. Mills' hourly rates are designed to compensate Mills fairly for the work of its attorneys and paralegals and to cover fixed and routine overhead expenses. Hourly rates are subject to periodic adjustments to reflect economic and other conditions (which adjustments will be reflected in the first Mills fee application following such adjustments).[3]

33. Mills did not agree to any variations from, or alternatives to, its standard or customary billing arrangements for this engagement, and none of the Mills professionals included in this engagement will vary his or her rate based on the geographic location of the Chapter 11 Cases.

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[3] Mills generally increases the hourly billing rate of attorneys and paraprofessionals from time-to-time, typically on January 1 of each calendar year. As set forth in the Order, Mills will provide ten business-days' notice to the Debtors, the U.S. Trustee, and the Creditors' Committee before implementing any periodic increases, and will file any such notice with the Court.

34. Consistent with the Engagement Letter and Mills' policy with respect to its other clients, Mills will continue to charge the Debtors for all services provided and for other charges and disbursements incurred in the rendition of services. It is Mills' policy to charge its clients in all areas of practice for identifiable, non-overhead expenses incurred in connection with the client's case that would not have been incurred except for representation of that particular client. It is also Mills' policy to charge its clients only the amount actually incurred by Mills in connection with such items.

## STATEMENT PURSUANT TO THE U.S. TRUSTEE GUIDELINES

35. Mills intends to make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the U.S. Trustee Guidelines, both in connection with this Application and with any fee applications filed by Mills in the Chapter 11 Cases.

36. The following is provided in response to the request for additional information set forth in Paragraph D.1 of the U.S. Trustee Guidelines:

a. **Question:** Did Mills agree to any variations from, or alternatives to, Mills' standard billing arrangements for this engagement?

**Answer:** No.

b. **Question:** Do any of the Mills professionals in this engagement vary their rate based on the geographic location of the Debtors' chapter 11 cases?

**Answer**: No.

c. **Question:** If Mills has represented the Debtors in the 12 months prepetition, disclose Mills' billing rates and material financial terms for the prepetition engagement, including any adjustments during the 12 months prepetition. If Mills' billing rates and material financial terms have changed postpetition, explain the difference and the reasons for the difference.

**Answer:** Mills was not retained pre-petition.

d. **Question:** Have the Debtors approved Mills' budget and staffing plan and, if so, for what budget period?

**Answer:** The Debtors have not requested a budget and/or staffing plan from Mills.

**MILLS' DISINTERESTEDNESS**

37. To the best of my knowledge, each of the partners, counsel, and associates of Mills do not have any conflicts or other relationships that might cause Mills not to be disinterested or to hold or represent an interest adverse to the Debtors.

38. Mills and certain of its partners, counsel, and associates may have in the past represented, may currently represent, and likely in the future will represent parties-in-interest to the Debtors in connection with matters unrelated to the Debtors, the Chapter 11 Cases, or such entities claims against or interests in the Debtors.

39. Mills obtained from the Debtors and their representatives the names of the individuals and entities that may be parties in interest in the Chapter 11 Cases, and such parties are listed on **Schedule 1** attached hereto. Mills has searched its electronic database for connections with the persons and entities on **Schedule 1**. Mills maintains and systematically updates its conflict conflicts check system in the regular course of business, and it is the regular practice of the firm to make and maintain these records. The conflict check system maintained by the firm is designed to include every matter on which the firm is now or has been engaged, the entity for which the firm is now or has been engaged, and, in each instance, the identity of related parties and adverse parties and the attorney in the firm that is knowledgeable about the matter. It is the policy of Mills that no new matter may be accepted or opened within the firm without completing and submitting to those charged with maintaining the conflict check system information necessary to check each such matter for conflicts, including the identity of the prospective client, as well as

related and adverse parties. Accordingly, the database is regularly updated for every new matter undertaken by Mills.

40. A list of the parties-in-interest that Mills submitted to its conflict database, under my direction and supervision, is attached hereto as **<u>Schedule 1</u>**. Such list includes, among others:

- Debtors;
- Non-Debtor Affiliates
- Debtors' Previous Names, Predecessors, and Related Entities;
- Debtors' Restructuring and Other Significant Professionals;
- Debtors' Ordinary Course Professionals;
- Professionals for Other Major Stakeholders;
- Major Equity Holders;
- Current and Former Officers and Directors (Up to 3 Years);
- Trustees, Agents, Secured Lenders (Including Certain Bold Holders), and Potential Lienholders;
- Other Noteholders;
- Top 30 Unsecured Creditors;
- Major Suppliers and Vendors;
- Major Customers;
- Debtors' Banks;
- Insurance Parties;
- Surety Bond Issuers & Beneficiaries;
- Landlords;
- Utilities;

- United States Bankruptcy Judges for the Southern District of Texas (and Key Staff Members);
- United States Trustee for the Southern District of Texas (and Key Staff Members);
- Employee Insurance Program Administrators;
- Competitors;
- Adverse Parties in Litigation, Administrative Proceedings, and Other Legal or Regulatory Matters; and
- Government Authorities and Tax Collectors.

41. To the best of my knowledge, (i) Mills has no connection with any of the parties listed in **Schedule 1**; (ii) Mills is not a creditor, an equity security holder, or an insider of the Debtors; (iii) no Mills attorneys are or were, within two years of the Petition Date, a director, officer, or employee of the Debtors; (iv) Mills does not hold or represent any interest materially adverse to the Debtors' estates or any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in the Debtors or for any other reason.

42. Based on the searches conducted to date and described herein, to the best of my knowledge, neither I, Mills, nor any partner, counsel, or associate of the firm, has any connection with the Debtors, their creditors, or any other parties-in-interest, except as disclosed or otherwise described herein.

43. Pursuant to Bankruptcy Rule 2016(b), Mills has not shared nor agreed to share (i) any compensation it has received or may receive with another party or person in connection with the Chapter 11 Cases, other than with the partners, counsel, associates and contract attorneys

associated with Mills, or (ii) any compensation another person or party has received or may receive in connection with the Chapter 11 Cases.

44. Based on the foregoing and the search conducted to date and described herein, to the best of my knowledge and insofar as I have been able to ascertain, (i) Mills is a "disinterested person" within the meaning of the Bankruptcy Code, and does not hold or represent an interest adverse to the Debtors' estates, and (ii) Mills has no connection to the Debtors, the Debtors' creditors, or other parties in interest, except as may be disclosed herein.

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.

Dated: October 24, 2025

*_/s/ Amanda Halstead_*
Amanda Halstead
Manager of Real Estate Practice Group
Mills Halstead Zaloudek, LLC

# SCHEDULE 1

## Master List of Potential Parties in Interest[1]

[1] 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.

## 1. 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
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

## 2. 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

## 3. 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)

## 4. 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
ERNST & YOUNG US LLP

## 5. DEBTORS' ORDINARY COURSE PROFESSIONALS

BRADLEY ARANT BOULT CUMMINGS LLP
CAPITAL IMPACT GROUP LLC
GIBSON, DUNN & CRUTCHER LLP
KELLEY CONSULTING
KPMG LLP
STEVES & LEE P.C.
MANATT, PHELPS & PHILLIPS LLP
MAINE STREET SOLUTIONS
MERCURY PUBLIC AFFAIRS, LLC
GAFFNEY BENNETT AND ASSOCIATES, INC.
SAUL EWING ARNSTEIN & LEHR LLP
KRAMON & GRAHAM PA
BONDURANT MIXSON & ELMORE LLP
HONIGMAN LLP
BALCH & BINGHAM LLP
DERRYBERRY & NAIFEH, LLP
BOWLES RICE LLP
JAMES MILLER & ASSOCIATES
NIELSEN MERKSAMER PARRINELLO GROSS LEONI
BYRDGOMES LLC
BAKER & HOSTETLER LLP
VERRILL & DANA LLP
LITTLER MENDELSON PC
M J SIMON & COMPANY LLC
NIXON PEABODY LLP
POLSINELLI PC
PWC US BUSINESS ADVISORY
FAEGRE DRINKER BIDDLE & REATH LLP
CAPITAL CITY CONSULTING, LLC
JL MORGAN COMPANY INC
ANDERSON RICHARD CONSULTING LLC
PERRY, WHITE, ROSS & JACOBSON LLC
MCCALL HAMILTON ADVOCACY LLC
CENTERPOINT 360 LLC
1868 PUBLIC AFFAIRS
HUMAN STRAUB ADVISORS LLC
SMITH ANDERSON BLOUNT DORSETT MITCHELL
AMBER INTEGRATED LLC
RIDGE POLICY GROUP

SOUTHERN STRATEGY GROUP, CHARLESTON AND COLUMBIA, SOUTH CAROLINA
WEST VIRGINIA LOBBYIST GROUP
CASTLEBERRY LAW FIRM
GORDON REES SCULLY MANSUKHANI LLP

## 6. PROFESSIONALS FOR OTHER MAJOR STAKEHOLDERS

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

## 7. MAJOR EQUITY HOLDERS[2]

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

## 8. 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

## 9. 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

[2] 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.

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.
KEYBANK, NATIONAL ASSOCIATION
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
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

## 10. OTHER NOTEHOLDERS

JUPITER FUND MANAGEMENT
BLACKROCK
STATE STREET
OLIVE STREET INVESTMENT ADVISERS
GRACE PARTNERS OF DUPAGE
CANADIAN IMPERIAL BANK
AMERIPRISE FINANCIAL
POLEN CAPITAL MANAGEMENT
MADISON AVENUE INTERNATIONAL LP
JUPITER ASSET MANAGEMENT

## 11. 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

## 12. 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
ANYBILL
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
COMMUNITY TRANSPORTATION ASSOCIATION OF AMERICA
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
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
FE GLOBAL SOLUTIONS LLC
WORKBOARD INC
WORKDAY INC
YELLOW CAB MEDICAL TRANSPORT LLC

**13. MAJOR CUSTOMERS**

ALAMEDA ALLIANCE FOR HEALTH
ARKANSAS DEPARTMENT OF HUMAN SERVICES OFFICE OF PROCUREMENT
BLUE CROSS OF CALIFORNIA
BROADRIDGE ICS
COMMONWEALTH OF VIRGINA DEPARTMENT OF MEDICAL ASSISTANCE SERVICES
COMMONWELTH OF PENNSYLVANIA DEPARTMENT OF HUMAN SERVICES
COMMONWELTH OF VIRGINA 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
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

**14. DEBTORS' BANKS AND OTHER BANKING PARTIES**

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
STATE EMPLOYEES' CREDIT UNION

**15. 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

## 16. 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

**17. 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
NORTHPARK 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

**18. 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 REQUIPMENT INC
WIGGINS SHREDDING, INC
WINDSTREAM
WM CORPORATE SERVICES, INC.
YALL RITE LLC DBA GREENLEAF RECYCLING

## 19. 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

### 20. 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

### 21. 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.

### 22. COMPETITORS

ACCESSCARE
ALIVI HEALTH
CALL THE CALL
MEDIDRIVE
MTM, INC.
RIDE2MD

### 23. ADVERSE PARTIES IN LITIGATION, ADMINISTRATIVE PROCEEDINGS, AND OTHER LEGAL OR REGULATORY MATTERS

LAW OFFICES OF DAVID M. GASPARI, P.A.[3]
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

[3] Law firm names appear where an adverse plaintiff's name has been anonymized in court filings.

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
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

NEW YORK STATE OFFICE OF MEDICAID INSPECTOR GENERAL
ANNETTE L. JENKINES
AUDREY JOHNSON
DAVID M. BEACH
DEBORAH SLAUGHTER
JUSTIN T. BAMBERG
GEORGIA INSURERS INSOLVENCY POOL
GERMANTOWN CAB
JOAN NEWMAN
KAITLYN CLEMONS
BRITTANY HANLEY
LEWIS HAGAR
MARIE LONGUEFOSSE
MARITIKA USA LLC
STATE OF NEW JERSEY DEPARTMENT OF LABOR AND WORKFORCE DEVELOPMENT
SARAH CAR CARE, INC.
SHINICQUA WILLIAMS
SONIA BURGOS
MARK K. STROBEL
YVETTE PROPHETE
ZAYDA STENGER

## 24. <u>GOVERNMENT AUTHORITIES AND TAX COLLECTORS</u>

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

## 25. NOTICE OF APPEARANCE FILERS

SAN JACINTO COMMUNITY COLLEGE DISTRICT
CITY OF HOUSTON
ALIEF INDEPENDENT SCHOOL DISTRICT
HUMBLE INDEPENDENT SCHOOL DISTRICT
KLEIN INDEPENDENT SCHOOL DISTRICT
LA PORTE INDEPENDENT SCHOOL DISTRICT
PASADENA INDEPENDENT SCHOOL DISTRICT
SPRING INDEPENDENT SCHOOL DISTRICT
SPRING BRANCH INDEPENDENT SCHOOL DISTRICT
TOMBALL INDEPENDENT SCHOOL DISTRICT
BROWNSVILLE INDEPENDENT SCHOOL DISTRICT
FRISCO INDEPENDENT SCHOOL DISTRICT
PLANO INDEPENDENT SCHOOL DISTRICT
CITY OF FRISCO, TEXAS
GREGG COUNTY, TEXAS
TOM GREEN COUNTY, TEXAS CENTRAL APPRAISAL DISTRICT
NAVARO COUNTY, TEXAS
GRAYSON COUNTY, TEXAS
SMITH COUNTY,TEXAS
STEPHENSVILLE INDEPENDENT SCHOOL DISTRICT
LEWISVILLE INDEPENDENT SCHOOL DISTRICT
ALLEN INDEPENDENT SCHOOL DISTRICT
ELLIS COUNTY, TEXAS
CITY OF STEPHENVILLE, TEXAS
PARKER CENTRAL APPRAISAL DISTRICT
VIRGINIA DEPARTMENT OF MEDICAL ASSISTANCE SERVICES
ECTOR, TEXAS CENTRAL APPRAISAL DISTRICT
RANDALL COUNTY, TEXAS TAXING DISTRICT
POTTER COUNTY, TEXAS TAXING DIRECT
CHILDRESS COUNTY, TEXAS APPRAISAL DISTRICT
GRAY COUNTY, TEXAS COUNTY
HALEY COUNTY, TEXAS APPRAISAL DISTRICT
HUTCHISON COUNTY TEXAS TAX OFFICE
OCHILTREE COUNTY, APPRAISAL DISTRICT
BAILEY CENTRAL APPRAISAL DISTRICT
LUBBOCK CENTRAL APPRAISAL DISTRICT
MIDLAND COUNTY, TEXAS
SCURRY COUNTY, TEXAS TAX OFFICRE
BEXAR COUNTY, TEXAS
CITY OF EL PASO, TEXAS
HARRIS COUNTY, TEXAS
KEYSTONE QUALITY TRANSPORT
GALVESTON COUNTY, TEXAS
HOUSTON COMMUNITY COLLEGE SYSTEM
FORT BEND COUNTY, TEXAS
TEXAS CITY, TEXAS INDEPENDENT SCHOOL DISTRICT
LONE STAR COLLEGE SYSTEM
CYPRESS-FAIRBANKS INDEPENDENT SCHOOL DISTICT
JEFFERSON COUNTY, TEXAS
MONTGOMERY COUNTY, TEXAS

KATY, INDEPENDENT SCHOOL DISTRICT
TARRANT COUNTY, TEXAS
DALLAS COUNTY, TEXAS
WICHITA COUNTY, TEXAS
CENTRAL APPRAISAL DISTRICT OF
TAYLOR COUNTY
REEVES COUNTY TAX DISTRICT
HAYS COUNTY, TEXAS
DENTON COUNTY, TEXAS
COMAL COUNTY, TEXAS
BRAZOS COUNTY, TEXAS
BURNET CENTRAL APPRAISAL DISTRICT
AUTOMOTIVE RENTALS, INC.
ARI FLEET LT
NUECES COUNTY, TEXAS
CAMERON COUNTY, TEXAS
HIDALGO COUNTY, TEXAS
MCCLENNAN COUNTY, TEXAS
HAYS TEXAS CONSOLIDATED
INDEPENDENT SCHOOL DISTIRCT
SAN MARCOS CONSOLIDATED
INDEPENDENT SCHOOL DISTRICT

# Exhibit 1

## Engagement Letter

600 17th Street
Suite 2800
Denver, Colorado 80202

Mills · Halstead · Zaloudek LLC
Attorneys at Law

Phone 303-226-5861
Fax 303-228-7171
www.mshzlaw.com

**Amanda H. Halstead**
**ahh@mhzlegal.com**

September 17, 2025

**VIA EMAIL**
MODIVCARE INC.
Attn: Kevin Morbee
kevin.morbee@modivcare.com

Re: Engagement Letter

Dear Mr. Morbee,

We appreciate that you have selected the law firm of Mills Halstead & Zaloudek, LLC to assist you with the legal services described in this letter. The purpose of this letter is to confirm the scope of services we will be providing to you, together with the fees that we will charge.

The initial scope of our representation will pertain to the matter of assisting you with lease amendments and modifications; however, the scope may change from time to time, as circumstances may change. In the future, we may do additional work for you on new matters at your request, which will also be governed by the understanding set forth in this letter and in that certain Conflict Waiver executed by on or about the date hereof and addressing our firm's joint representation of you.

Our fees will be determined on the basis of time spent by the individuals who provide the services at their hourly rates. The hourly rate for Amanda Halstead, the primary attorney responsible for your matter, is $450.00. The hourly rate for paralegals at Mills Halstead & Zaloudek LLC is $135.00. Our hourly rates may be adjusted from time-to-time, typically on January 1st of each year. You may contact us as at any time to discuss new rates that may be charged.

In addition, we will bill you for expenses incurred including, but not limited to, filing and recording fees, serving of summons and subpoenas, deposition expense, expert witness fees, accountants, appraisers, investigators, photocopying, facsimile charges, postage, courier and messenger charges, travel expenses, computerized research charges and other out-of-pocket expenses. The firm will incur administrative and bookkeeping expenses in connection with the disbursement of such funds, and therefore a 15% servicing fee will be added on the amounts disbursed.

Our invoices are mailed monthly and, unless other arrangements are made, payment in full is due within 30 days after the date of the invoice. Interest may be charged at 18% per annum on all balances outstanding for more than 30 days. If you have any questions or concerns regarding any bill, we ask that you notify us promptly. If legal action is required for collection of unpaid charges or fees, the firm may recover its reasonable costs of collection, including attorney's fees related to that litigation. This fee structure will apply to this matter and any other future matters handled by the firm on your behalf unless other arrangements are made in writing. By signing below, you acknowledge that you will both be jointly and severally liable for those amounts due and owing pursuant to this Agreement.

We have completed a preliminary search of our records to determine that there are not any conflicts of interest. However, we are in the process of conducting a more thorough examination of our records and will advise you immediately if any conflicts of interest are found that may affect our ability to represent you in this matter.

In the course of our representation of you in this matter, we may collect nonpublic personal information from you. You should know that all nonpublic personal information that we receive from you is held in confidence and is not released to anyone outside the firm except as necessary to carry out our representation of you, as otherwise agreed to by you, or as required under applicable law. While federal law may require us to inform you of our policy, it does not limit the attorney-client privilege or the confidentiality rules which are governed by state law and the rules of professional conduct. In order to guard your nonpublic personal information, we maintain physical, electronic and procedural safeguards that comply with our professional standards**.** We will retain your original file, or a copy thereof, for a period of seven years after the termination on a particular matter. You may request your original file from the Firm at any time. Seven years after the termination of the attorney-client relationship on a particular matter, however, the Firm will be authorized to destroy your file for that matter without any further approval from you and without retaining copies thereof**.** With regard to public information, that is to say information that either you or someone else has distributed to a third party, we understand that that information may be disclosed by us in connection with our representation, unless you advise to the contrary.

You or our firm may terminate this engagement at any time, by notification in writing. Reasons for such termination may include, but are not limited to, your failure to pay fees or expenses (including any required deposit), your failure to cooperate with the firm in preparation of the case, and reasons mandated by the Code of Professional Responsibility as approved by the Supreme Court of Colorado.

If you have any questions concerning the matters set forth in this letter, please contact me. Otherwise, please execute the acknowledgement below and return a copy of this letter to me.

Finally, we look forward to working with you. While we cannot guarantee the results which will be achieved, your confidence in our team of lawyers and professional staff motivates and inspires each one of us to provide you with the finest quality legal services possible. Thank you for the opportunity to serve.

Sincerely,

**MILLS HALSTEAD & ZALOUDEK, LLC**

By: AHalstead

Amanda H. Halstead

As a matter of record, please sign and fax the acknowledgement below formally signifying your acceptance of the agreement with Mills Halstead and Zaloudek LLC outlined in this letter. There is no other agreement between the parties other than as contained in this agreement.

**ACCEPTED:**

**MODIVCARE INC.,**
**a Delaware corporation**

By: ______________________________
Name: ____________________________
Title: _____________________________

# Exhibit B

## Retention Declaration

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

| | | |
|---|---|---|
| In re: | : | Chapter 11 |
| MODIVCARE INC., *et al.*, | : | Case No. 25-90309 (ARP) |
| Debtors.[1] | : | (Jointly Administered) |

**DECLARATION OF FAISAL KHAN,**
**GENERAL COUNSEL AND SECRETARY,**
**IN SUPPORT OF DEBTORS' APPLICATION FOR ENTRY**
**OF AN ORDER AUTHORIZING EMPLOYMENT AND RETENTION OF**
**MILLS HALSTEAD ZALOUDEK, LLC AS REAL ESTATE COUNSEL**
**EFFECTIVE AS OF OCTOBER 24, 2025**

I, Faisal Khan, declare as follows:

1. I am General Counsel and Secretary of the debtors and debtors in possession in the above-captioned chapter 11 cases (collectively, the "***Debtors***" or the "***Company***"). In this capacity, I am familiar with the Debtors' day-to-day operations, business, financial affairs and books and records. As part of my responsibilities, I am involved with the supervision of outside counsel and with the monitoring and control of legal costs.

2. I submit this declaration (the "***Retention Declaration***") in support of the *Debtors' Application for Entry of an Order Authorizing the Employment and Retention of Mills Halstead Zaloudek, LLC as Real Estate Counsel Effective as of October 24, 2025* (the "***Application***").[2]

---

[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.

[2] Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Application.

Except as otherwise noted, all facts in this Retention Declaration are based on my personal knowledge of the matters set forth herein, information gathered from my review of relevant documents, and information supplied to me by other members of the Debtors' management and the Debtors' advisors.

**THE DEBTORS' SELECTION OF REAL ESTATE COUNSEL**

3. Mills possesses an in-depth knowledge of the Debtors' real estate affairs and has gained insight into many of the legal issues that might arise in the context of the Chapter 11 Cases.

4. The Debtors recognize that a comprehensive review process is necessary when selecting and managing chapter 11 real estate counsel to ensure that professionals are subject to the same client-driven market forces, scrutiny, and accountability as professionals in non-bankruptcy engagements. The Debtors chose Mills based upon its reputation and experience in the real estate field generally and upon the Debtors' particular circumstances, including the complexity of the lease amendments and modifications.

5. For the reasons set forth above, I believe that Mills is both well-qualified and uniquely able to represent the Debtors as real estate counsel in the Chapter 11 Cases. Thus, the Debtors decided to continue to retain Mills as the Debtors' real estate counsel during the Chapter 11 Cases.

**PROFESSIONAL COMPENSATION**

6. In my capacity as General Counsel and Secretary, I am involved in the Debtors' retention and supervision of certain outside professional services firms, including the professionals proposed to be retained in the Chapter 11 Cases.

7. Prior to the engagement of Mills, I approved Mills' standard billing rates and the material terms of the engagement. Based on the Debtors' evaluation of other law firms prior to retaining Mills, I can confirm that Mills' rates and terms are comparable to those of other comparably skilled professionals. Additionally, Mills' has informed the Debtors that its rates for bankruptcy representations are comparable to the rates it charges for non-bankruptcy representations.

**COST SUPERVISION**

8. The Debtors recognize that it is their responsibility to monitor closely the billing practices of their counsel to ensure the fees and expenses paid by the Debtors' estates remain consistent with the Debtors' expectations and the exigencies of the Chapter 11 Cases. The Debtors will continue to review invoices that Mills submits during the Chapter 11 Cases.

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

Dated: October 24, 2025

*/s/ Faisal Khan*
Name: Faisal Khan
Title: General Counsel and Secretary

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

| | | |
|---|---|---|
| In re: | ) | Chapter 11 |
| MODIVCARE INC., *et al.* | ) | Case No. 25-90309 (ARP) |
| Debtors.[1] | ) | (Jointly Administered) |

**ORDER**
**AUTHORIZING THE EMPLOYMENT AND RETENTION OF**
**MILLS HALSTEAD ZALOUDEK, LLC AS REAL ESTATE COUNSEL**
**EFFECTIVE AS OF OCTOBER 24, 2025**
**[Relates to Docket No. ___]**

Upon the application (the "***Application***")[4] of the Debtors for entry of an order authorizing the Debtors to employ and retain Mills Halstead Zaloudek, LLC ("***Mills***") as their real estate counsel effective as of October 24, 2025; and the Court having reviewed the Application, the Halstead Declaration, and the Retention Declaration; and the Court having determined that the relief requested in the Application is in the best interests of the Debtors, their estates, their creditors, and other parties in interest; 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 the Court having found that the Application is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and the Court having found that venue of this proceeding and the Application in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and the Court being satisfied, based on the

[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 these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

[2] Capitalized terms used but not otherwise defined herein have the meaning ascribed to them in the Application.

representations made in the Application and the Halstead Declaration that Mills is "disinterested" as such term is defined in section 101(14) of the Bankruptcy Code, as modified by section 1107(b) of the Bankruptcy Code, and as required under section 327(a) of the Bankruptcy Code, and that Mills does not hold or represent an interest adverse to the Debtors' estates; and any objections to the Application having been resolved or overruled; and the Court having found that it may enter a final order consistent with Article III of the United States Constitution; and it appearing that proper and adequate notice of the Application has been given and that no other or further notice is necessary; and upon the record herein and upon all of the proceedings had before this Court; and after due deliberation thereon; and the Court having determined that the relief requested in the Application is in the best interests of the Debtors, their estates, their creditors, and other parties in interest, it is hereby

**ORDERED, ADJUDGED, AND DECREED THAT:**

1. The Application is granted to the extent set forth herein.

2. Pursuant to sections 327(a) and 329 of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016, and Bankruptcy Local Rules 2014-1 and 2016-1, the Debtors, as debtors in possession, are authorized to employ and retain Mills as their real estate counsel effective as of October 24, 2025 in accordance with the terms and conditions set forth in the Application and in the Engagement Letter.

3. Mills is authorized to provide the Debtors with the professional services described in the Application and the Engagement Letter.

4. Mills shall apply for compensation for professional services rendered and reimbursement of expenses incurred in connection with the Chapter 11 Cases in compliance with sections 330 and 331 of the Bankruptcy Code and the applicable provisions of the Bankruptcy Rules, the Bankruptcy Local Rules, and any other applicable procedures and orders of the Court.

5. Prior to any increases in Mills' hourly rates, Mills shall file a notice of rate increase with the Court and provide ten business days' notice to the Debtors, the U.S. Trustee, and the Creditors' Committee, which notice shall explain the basis for the requested rate increases in accordance with section 330(a)(3)(F) of the Bankruptcy Code and state whether the Debtors have consented to such rate increases.

6. Mills shall not charge a markup to the Debtors with respect to fees billed by contract attorneys who are hired by Mills to provide services to the Debtors and shall ensure that any such contract attorneys are subject to conflict checks and disclosures in accordance with the requirements of the Bankruptcy Code and Bankruptcy Rules.

7. Mills shall review its files periodically during the pendency of the 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, Mills shall use reasonable efforts to identify such further developments and will promptly file a supplemental declaration, as required by Bankruptcy Rule 2014(a).

8. Notice of the Application as provided therein shall be deemed good and sufficient notice of such Application, and the requirements of Bankruptcy Rule 6004(a) and the Bankruptcy Local Rules are satisfied by such notice.

9. Notwithstanding Bankruptcy Rule 6004(h), this Order shall be immediately effective and enforceable upon its entry.

10. The Debtors are authorized to take all action necessary to effectuate the relief granted in this Order.

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

Signed: _______________, 2025
Houston, Texas

ALFREDO R. PÉREZ
UNITED STATES BANKRUPTCY JUDGE