

**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)

**SECOND SUPPLEMENTAL 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**

[Relates to Docket Nos. 472, 593, 616]

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.

---

<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.



2590309251206000000000003

2. I submit this supplemental declaration (the “**Second Supplemental 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 September 9, 2025* (the “**Application**”), filed on October 8, 2025 [Docket No. 472],<sup>2</sup> and as a supplemental to my prior declaration in support of the Application filed as Exhibit B to the Application (the “**Original Declaration**”) and to my first supplemental declaration in support of the Application filed October 29, 2025 [Docket No. 593] (the “**First Supplemental Declaration**” and, collectively, the “**Prior Declaration**”). On October 31, 2025, the Court entered an order authorizing the employment and retention of White & Case as counsel to the Committee [Docket No. 616].

3. 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>

#### **DISCLOSURES REGARDING NEW PARTIES IN INTEREST**

4. Recently, the Debtors provided White & Case with a list of names of additional potential parties in interest, which additional potential parties are identified on **Schedule 1** annexed hereto (the “**Supplemental Parties in Interest**”).

5. Prior to filing this Second Supplemental Declaration, following the procedure set forth in my Original Declaration, White & Case conducted a disclosure review with respect to the

---

<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.

Firm's connections to the Supplemental Parties in Interest. 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 & Case's revenue for the twelve-month period through October 31, 2025.

6. Based upon the foregoing, I respectfully submit that the requirements for White & Case's retention as attorneys for the Committee has been and continues to be 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: December 6, 2025  
Chicago, Illinois

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

---

<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.

**Schedule 1**

**Supplemental Parties in Interest**

**DEBTORS' RETAINED REAL ESTATE PROFESSIONALS**

MILLS HALSTEAD & ZALOUDEK, LLC CRESA, LLC

**DEBTORS' ORDINARY COURSE PROFESSIONALS**

STEVENS & LEE P.C.	JL MORGAN COMPANY INC
MANATT, PHELPS & PHILLIPS LLP	ANDERSON RICHARD CONSULTING LLC
MAINE STREET SOLUTIONS	PERRY, WHITE, ROSS & JACOBSON LLC
MERCURY PUBLIC AFFAIRS, LLC	MCCALL HAMILTON ADVOCACY LLC
GAFFNEY, BENNETT AND ASSOCIATES, INC.	CENTERPOINT 360 LLC
SAUL EWING ARNSTEIN & LEHR LLP	1868 PUBLIC AFFAIRS
KRAMON & GRAHAM PA	SMITH ANDERSON BLOUNT DORSETT MITCHELL
BONDURANT MIXSON & ELMORE LLP	AMBER INTEGRATED LLC
HONIGMAN LLP	RIDGE POLICY GROUP
BALCH & BINGHAM LLP	WEST VIRGINIA LOBBYIST GROUP
DERRYBERRY & NAIFEH, LLP	CASTLEBERRY LAW FIRM
BOWLES RICE LLP	GORDON REES SCULLY MANSUKHANI LLP
JAMES MILLER & ASSOCIATES	WILLCOX SAVAGE PC
NIELSEN MERKSAMER PARRINELLO GROSS & LEONI LLP	WILLCOX SAVAGE CONSULTING LLC
BYRDGOMES LLC	THE SOUTHERN GROUP OF SOUTH CAROLINA 2005, LLC
BAKER & HOSTETLER LLP	MONTANA GROUP, LTD
VERRILL DANA LLP	WILLOUGHBY HUMPHREY & D'ANTONI PA
PWC US BUSINESS ADVISORY	HINMAN STRAUB ADVISORS
FAEGRE DRINKER BIDDLE & REATH LLP	
CAPITAL CITY CONSULTING, LLC	

**PROFESSIONALS FOR OTHER MAJOR STAKEHOLDERS**

ALIX PARTNERS LLP

WHITE & CASE LLP

BRESLIN, YOUNG & SLAUGHTER, LLC

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

ALLSPRING GLOBAL INVESTMENTS

NEWFLEET ASSET MANAGEMENT

CSS, LLC

VIRTUS FIXED INCOME ADVISERS, LLC

SABA CAPITAL MANAGEMENT

THRIVENT ASSET MANAGEMENT

**SUPPLIERS, VENDORS, AND OTHER SERVICE PROVIDERS**

MEDEX MEDICAL TRANSPORT SERVICE  
INC.

[REDACTED]

[REDACTED]

[REDACTED]

NORTHEAST TREATMENT CENTERS

SCHELLMAN COMPLIANCE, LLC

SCHELLMAN & COMPANY LLC

**DEBTORS' BANKS AND OTHER BANKING PARTIES**

GUGGENHEIM SECURITIES, LLC

FIRST CITIZENS BANK & TRUST  
COMPANY

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

NEW YORK STATE OFFICE OF MEDICAID  
INSPECTOR GENERAL

GEORGIA INSURERS INSOLVENCY POOL

GERMANTOWN CAB

ANNETTE L. JENKINES

JOAN NEWMAN

AUDREY JOHNSON

KAITLYN CLEMONS

DAVID M. BEACH

BRITTANY HANLEY

DEBORAH SLAUGHTER

LEWIS HAGAR

JUSTIN T. BAMBERG

MARIE LONGUEFOSSE

MARITIKA USA LLC

MARK K. STROBEL

STATE OF NEW JERSEY DEPARTMENT OF  
LABOR AND WORKFORCE  
DEVELOPMENT

YVETTE PROPHETE

ZAYDA STENGER

SARAH CAR CARE, INC.

CHRISTOPHER SKRYPISKI

SHINICQUA WILLIAMS

LISA SALLAJ

SONIA BURGOS

**NOTICE OF APPEARANCE FILERS**

SAN JACINTO COMMUNITY COLLEGE  
DISTRICT

TOM GREEN COUNTY, TEXAS CENTRAL  
APPRAISAL DISTRICT

CITY OF HOUSTON

NAVARRO COUNTY, TEXAS

ALIEF INDEPENDENT SCHOOL DISTRICT

GRAYSON COUNTY, TEXAS

HUMBLE INDEPENDENT SCHOOL  
DISTRICT

SMITH COUNTY, TEXAS

KLEIN INDEPENDENT SCHOOL DISTRICT

STEPHENVILLE INDEPENDENT SCHOOL  
DISTRICT

LA PORTE INDEPENDENT SCHOOL  
DISTRICT

LEWISVILLE INDEPENDENT SCHOOL  
DISTRICT

PASADENA INDEPENDENT SCHOOL  
DISTRICT

ALLEN INDEPENDENT SCHOOL DISTRICT

SPRING INDEPENDENT SCHOOL  
DISTRICT

ELLIS COUNTY, TEXAS

CITY OF STEPHENVILLE, TEXAS

SPRING BRANCH INDEPENDENT SCHOOL  
DISTRICT

PARKER CENTRAL APPRAISAL DISTRICT

TOMBALL INDEPENDENT SCHOOL  
DISTRICT

VIRGINIA DEPARTMENT OF MEDICAL  
ASSISTANCE SERVICES

BROWNSVILLE INDEPENDENT SCHOOL  
DISTRICT

ECTOR COUNTY, TEXAS, CENTRAL  
APPRAISAL DISTRICT

FRISCO INDEPENDENT SCHOOL  
DISTRICT

RANDALL COUNTY, TEXAS TAXING  
DISTRICT

PLANO INDEPENDENT SCHOOL DISTRICT

POTTER COUNTY, TEXAS TAXING  
DISTRICT

CITY OF FRISCO, TEXAS

CHILDRESS COUNTY, TEXAS APPRAISAL  
DISTRICT

GREGG COUNTY, TEXAS

GRAY COUNTY, TEXAS

HALE COUNTY, TEXAS APPRAISAL  
DISTRICT

HUTCHINSON COUNTY TEXAS TAX  
OFFICE

OCHILTREE COUNTY, APPRAISAL  
DISTRICT

BAILEY CENTRAL APPRAISAL DISTRICT

LUBBOCK CENTRAL APPRAISAL  
DISTRICT

MIDLAND COUNTY, TEXAS

SCURRY COUNTY, TEXAS TAX OFFICE

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 DISTRICT

JEFFERSON COUNTY, TEXAS

MONTGOMERY COUNTY, TEXAS

KATY, INDEPENDENT SCHOOL DISTRICT

**POTENTIAL INVESTORS**

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 CONSOLIDATED INDEPENDENT  
SCHOOL DISTRICT

SAN MARCOS CONSOLIDATED  
INDEPENDENT SCHOOL DISTRICT

OKLAHOMA COUNTY TREASURER

TEXAS COMPTROLLER OF PUBLIC  
ACCOUNTS, REVENUE ACCOUNTING  
DIVISION

PEGGY AARON

LIFESTAR RESPONSE OF MARYLAND,  
INC.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]



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

<b>CATEGORY</b>	<b>NAME</b>	<b>OPEN/ CLOSED</b>
POTENTIAL INVESTORS	[REDACTED]	OPEN
DEBTORS' BANKS AND OTHER BANKING PARTIES	FIRST CITIZENS BANK & TRUST COMPANY	OPEN
DEBTORS' BANKS AND OTHER BANKING PARTIES	GUGGENHEIM SECURITIES, LLC	OPEN
POTENTIAL INVESTORS	[REDACTED]	OPEN
TRUSTEES, AGENTS, SECURED LENDERS (INCLUDING CERTAIN BOND HOLDERS), AND OTHER POTENTIAL LIENHOLDERS	SABA CAPITAL MANAGEMENT	OPEN
POTENTIAL INVESTORS	[REDACTED]	OPEN
POTENTIAL INVESTORS	[REDACTED]	OPEN