

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

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

**SUPPLEMENTAL CERTIFICATION OF JAMES LEE REGARDING
THE SOLICITATION OF VOTES AND TABULATION OF
BALLOTS CAST ON THE FIRST AMENDED JOINT CHAPTER 11 PLAN
OF REORGANIZATION OF MODIVCARE INC. AND ITS DEBTOR AFFILIATES**

I, James Lee, declare, under the penalty of perjury, that the following is true and correct:

1. I am Vice President of Public Securities Services at Kurtzman Carson Consultants, LLC dba Verita Global (“*Verita*”), located at 222 North Pacific Coast Highway, Suite 300, El Segundo, California 90245. I am over the age of eighteen (18) years and not a party to the above-captioned action.

2. On December 14, 2025, the Debtors filed the *Certification of James Lee Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates* [Docket No. 916] (the “*Vote Certification*”) with respect to the solicitation of votes and the tabulation of Ballots cast 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.



First Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates [Docket No. 465] (the “**Plan**”).²

3. I submit this supplemental certification (the “**Supplemental Certification**”) in further support of the Plan and to provide additional information related to the votes on the Plan and the Release Opt-Out Forms in response to questions from the United States Trustee. Except as otherwise noted, all facts set forth herein are based on (a) my personal knowledge, (b) knowledge that I acquired from individuals under my supervision, including Sydney Reitzel, Director of Corporate Restructuring Services, who assisted in the service and tabulation described herein, and (c) my review of the relevant documents. I am authorized to submit this Supplemental Certification on behalf of Verita. If I were called to testify, I could and would testify competently as to the facts set forth herein.

4. As described in the Vote Certification, Verita caused the (a) Solicitation Packages to be sent to Holders of Claims in the Voting Classes (*i.e.*, Classes 3, 4, and 5) and the Notices of Non-Voting Status and Release Opt-Out Forms to be sent to Holders of Claims and Interests in certain of the Non-Voting Classes, specifically, Classes 1, 2, and 9. There were no Holders of Claims or Interests in Class 7, and the Debtors received a waiver of any requirement to serve Solicitation Packages or any other Plan-related materials on Holders of Claims or Interests in Class 6 (Intercompany Claims) or Class 8 (Intercompany Interests).

² Capitalized terms not otherwise defined herein shall have the same meanings ascribed to them in the Vote Certification.

5. **Total Ballots.** In total, Verita caused 13,465 Ballots to be served on Holders of Claims in the Voting Classes. The breakdown of the Ballots that were distributed to each Voting Class is shown in the below chart.

Class	Ballots
Class 3	182
Class 4 (GUC)	12,971
Class 4 (2L Notes)	75
Class 5	237
Total	13,465

6. **Total Release Opt-Out Form.** In total, Verita caused 19,536 Release Opt-Out Forms to be served on creditors and other parties in interests. The breakdown of the Release Opt-Out Forms that were distributed to parties in interest is shown in the below chart.

Class	Opt-Outs
Class 1	168
Class 2	106
Class 3 (as part of ballot)	182
Class 4 (GUC) (as part of ballot)	12,971
Class 4 (2L Notes) (as part of ballot)	75
Class 5 (as part of ballot)	237
Class 9	5,780
Other Parties In Interest (upon request)	17
Total	19,536

7. **Total Opt-Outs.** Below is a chart of the submitted Ballots and Release Opt-Out Forms that included an election to opt-out of the Plan's Third-Party Release.

Class	Total Opt-Outs
Class 1	15
Class 2	21
Class 3	2
Class 4 (GUC)	267
Class 4 (2L Notes)	0
Class 5	53
Class 9	16
Other Parties In Interest	14
Total	388

8. **Blank Ballots & Release Opt-Out Forms.** Of the Ballots and Opt-Out Forms delivered by Verita, a total of 88 were submitted blank, comprised of: (a) 73 blank Ballots and (b) 15 blank Release Opt-Out Forms.

9. **Parties In Interest Participation Rate.** Below is a chart of the participation rates broken out by Class for voting and elections to opt out of the Plan's Third-Party Release.

Class	Vote %	Opt-Out %
Class 1	N/A	8.93%
Class 2	N/A	19.81%
Class 3	98.35%	1.10%
Class 4 (GUC)	5.68%	2.06%
Class 4 (2L Notes)	97.33%	0.00%

Class	Vote %	Opt-Out %
Class 5	39.24%	22.36%
Class 9	N/A	0.28%
Other Parties in Interest (upon request)	N/A	82.35%

10. **Equity Rights Offering.** As of the Subscription Expiration Date for the Equity Rights Offering, only three Holders of Subordinated Unsecured Notes Claims subscribed for shares in the Reorganized Debtors. These Holders paid approximately \$98,375.40. No other Holders of Claims participated in the Equity Rights Offering.

Executed on December 9, 2025

/s/ James Lee
James Lee
Vice President of Public Securities Services
Verita Global