

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

United States Courts
Southern District of Texas
FILED

APR 02 2026

Nathan Ochsner, Clerk of Court

In re:
ModivCare Inc., et al.
Case No. 25-90309 (ARP)

RESPONSE OF ZBS LOGISTICS, LLC TO OMNIBUS CLAIM OBJECTION

I, the undersigned, hereby submit this response to the Reorganized Debtors' Omnibus Objection to my claim.

ZBS Logistics, LLC filed Claim No. 2379 in the amount of approximately \$16,922 for transportation services provided to mutual clients.

I respectfully disagree with the objection that my claim should be disallowed as late-filed.

I actively participated in the bankruptcy process and submitted a ballot as requested. Based on the communications I received, I believed I was complying with the required steps. There was confusion regarding the distinction between the ballot and the proof of claim filing requirements.

I did not intentionally delay filing my claim and acted in good faith. I submitted my claim as soon as I became aware of the requirement.

Disallowing my claim would create a significant hardship, as these services were already provided and remain unpaid.

I respectfully request that the Court consider my claim under the standard of excusable neglect and allow it to proceed.

For these reasons, I respectfully request that the Court allow my claim.

Respectfully submitted,

ZBS Logistics, LLC

Tonya Hazelton

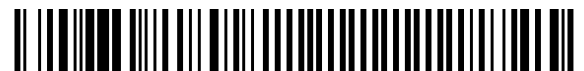
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Dated: March 26, 2026



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