

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS

In re:	§	
MODIVCARE INC., et al	§	Civil Action No. 4:26-cv-03651
Debtor	§	
	§	Bankruptcy Case No. 25-90309
MODIVCARE TOPCO, LLC	§	
Appellant	§	

**Notice of Filing of an Appeal**

1. A notice of appeal to the district court was filed before the bankruptcy court on May 1, 2026
2. This appeal has been assigned to United States District Judge Nicholas J. Gangei.
3. The appeal has been docketed as 4:26-cv-03651 .
4. Motions affecting this appeal, or the judgment or order from which this appeal is taken must be filed in accordance with Fed. R. Bankr. P. 8006, 8007, 8008 and 8009(e).
5. Within 14 days after the notice of appeal was filed, the appellant must file a designation of the record. *See* Fed. R. Bankr. P. 8009. Within 14 days after being served with the appellant's designation, appellees may file additional designations.
6. Designations of the record must be filed with the bankruptcy court. Do not file copies of designated items that are already on file with the bankruptcy court. Parties must electronically file copies of admitted trial exhibits they designate for inclusion in the record.

Date May 6, 2026

Nathan Ochsner, Clerk of Court  
S. Thomas  
Deputy Clerk



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

<b>IN RE:</b>	§	
	§	<b>CASE NO. 25-90309</b>
<b>MODIVCARE, INC.</b>	§	
	§	
<b>DEBTOR</b>	§	

**NOTICE OF APPEAL**  
**(Ref. ECF No. 1502)**

COMES NOW, ModivCare Topco, LLC (“**ModivCare**”) and files this Notice of Appeal as follows:

1. Appellant is ModivCare Topco, LLC, the Reorganized Debtor in the above referenced bankruptcy case.
2. The subject of the appeal is the bankruptcy court’s *Order Requiring the Reorganized Debtors To Deposit Funds In Escrow With The Court* (ECF No. 1502) (“**Deposit Order**”).
3. A copy of the Deposit Order, dated April 30, 2026, is attached as Exhibit A.
4. This Notice of Appeal is being filed within 14 days after the entry of the Fee Order and is a timely notice of appeal.
5. The other parties to this appeal are:
  - a. *White & Case LLP*  
Charles Koster  
Suite 2900  
609 Main St.  
Houston, TX 77002
  - b. *AlixPartners, LLP*  
David MacGreevey  
909 Third Avenue, 28<sup>th</sup> Floor  
New York, NY 10022

Dated: May 1, 2026.

Respectfully submitted,

By: /s/ Johnie Patterson  
Johnie Patterson  
attorney-in-charge  
SBN 15601700  
COUNSEL FOR MODIVCARE  
TOPCO, LLC

OF COUNSEL:  
WALKER & PATTERSON, P.C.  
P.O. Box 61301  
Houston, TX 77208  
jjp@walkerandpatterson.com  
713.956.5577 (telephone)  
713.956.5570 (fax)

**CERTIFICATE OF SERVICE**

I hereby certify that I served a true and complete copy of the foregoing Notice of Appeal was served via electronic transmission on May 1, 2026 on all parties receiving notices from the Court's CM/ECF servicing platform, as well as Charles Koster and David MacGreevey.

/s/Johnie Patterson  
Johnie Patterson

**ENTERED**

April 30, 2026

Nathan Ochsner, Clerk

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

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

**ORDER REQUIRING THE REORGANIZED DEBTORS  
TO DEPOSIT FUNDS IN ESCROW WITH THE COURT**

In connection with consideration of *White & Case LLP’s Final Application for Allowance of Compensation and Reimbursement of Expenses for the Period from September 9, 2025 Through December 29, 2025* [Docket No. 1290] (the “W&C Application”), the *Final Fee Application of AlixPartners, LLP, Financial Advisor to the Official Committee of Unsecured Creditors, for Allowance of Compensation for Professional Services Rendered and Reimbursement of Expenses Incurred for the Period from September 10, 2025 Through December 29, 2025* [Docket No. 1288] (the “AlixPartners Application” and, together with the W&C Application, the “Applications”); and in accordance with the Court’s rulings on the record at the status conference held on April 6, 2026, it is hereby ORDERED that:

1. The Reorganized Debtors shall deposit or cause or to be deposited in the registry of the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the “Court Registry”), on or before April 14, 2026, funds sufficient to pay all unpaid amounts sought

<sup>1</sup> A complete list of each of the Reorganized Debtors in these chapter 11 cases and the last four digits of each Reorganized Debtor’s taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors’ proposed claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Reorganized Debtor ModivCare Inc.’s principal place of business and the Reorganized Debtors’ service address in these chapter 11 cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

in the Applications, including \$628,727.58 in connection with the W&C Application and \$1,016,169.40 in connection with the AlixPartners Application.

2. The Court shall hold such funds in the Court Registry pending resolution of ModivCare Topco, LLC's objections to the Applications, and such funds shall be disbursed solely as directed by the Court in connection with the resolution of ModivCare Topco, LLC's objections to the Applications.

3. This Order shall not prevent White & Case, LLP or AlixPartners, LLP from seeking additional compensation from the Reorganized Debtors, including on account of reimbursable fees or expenses incurred after the effective date of the Reorganized Debtors' plan of reorganization.

4. The terms and conditions of this Order shall be immediately effective and enforceable upon its entry. This is a final order.

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

Signed: April 30, 2026

  
Alfredo R Pérez  
United States Bankruptcy Judge