Docket #1789 Date Filed: 10/02/2026

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

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

STIPULATION AND AGREED ORDER RESOLVING
MOTION OF JASON "AJ" SCUTT

This stipulation is entered into by the above-captioned reorganized debtors (collectively, the "***Reorganized Debtors***") and Jason "AJ" Scutt ("***Scutt***" and, together with the Reorganized Debtors, the "***Parties***") regarding the *Motion of Jason "AJ" Scutt for a Determination Under Section 10.5 of the Plan That He May Pursue Claims Against Modivcare Solutions, LLC Based Solely on Conduct After the Effective Date, or, in the Alternative, for A Colorability Determination and Authorization* (the "***Motion***");

WHEREAS, on December 15, 2025, the Court entered *the Order (I) Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates and (II) Denying Motions of Official Committee of Unsecured Creditors for Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Causes of Action on Behalf of Debtors' Estates* [Docket No. 1055] (the "***Confirmation Order***"), confirming the *Second Amended*

[1] A complete list of each of the Reorganized Debtors in these chapter 11 cases (the "***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' 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 the Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

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Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates attached thereto as **Exhibit A** (the "***Plan***");[2]

WHEREAS, the Effective Date occurred on December 29, 2025;

WHEREAS, on August 14, 2026, the Court entered the *Stipulation and Agreed Order Resolving Claim No. 2536 and Related Motions Filed by Jason "AJ" Scutt [Relates to Docket Nos. 1667, 1710, 1721, 1723, 1725, 1726, and 1727] [Docket No. 1731]* (the "***August Stipulation and Agreed Order***");

WHEREAS, on September 28, 2026, Scutt served the Motion on the Reorganized Debtors;

WHEREAS, to avoid the cost, uncertainty, and expense associated with litigating the Motion, and without any admission of liability, fact, or law by any Party, the Parties have agreed to resolve such matters on the terms set forth herein; and

WHEREAS, the Court, having considered the recitals contained herein and the representations of the Parties, and finding that good cause exists to approve, authorize, and enter this stipulation and agreed order (the "***Stipulation and Agreed Order***"),

IT IS THEREFORE HEREBY ORDERED THAT:

1. Nothing in the Plan, the Confirmation Order, or the August Stipulation and Agreed Order bars, requires further authorization for, or otherwise affects (i) any rights, claims, or defenses Scutt may assert against the Reorganized Debtors based on events that occurred after the Effective Date or (ii) any rights, claims, or defenses the Reorganized Debtors may assert against Scutt based on events that occurred after the Effective Date.

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

2. Effective upon the entry of this Stipulation and Agreed Order by the Court, Scutt hereby withdraws the Motion and all related filings. No further response, hearing, filing, or further relief shall be required with respect to the Motion. If this Stipulation and Agreed Order is not entered by the Court within twenty-one (21) days after its submission, then this Stipulation and Agreed Order shall be null and void and the Parties' respective positions with respect to the Motion shall be restored as if this Stipulation and Agreed Order had not been executed.

3. This Stipulation and Agreed Order constitutes a compromise of disputed matters. This Stipulation and Agreed Order does not constitute an admission by any Party concerning the timeliness, validity, amount, priority, or merits of any right, claim, or defense.

4. Each Party executing this Stipulation and Agreed Order represents that such person has authority to execute and deliver this Stipulation and Agreed Order on behalf of the applicable Party.

5. This Stipulation and Agreed Order may be executed in counterparts, each of which shall be deemed an original, and electronic signatures shall have the same force and effect as original signatures.

6. To the fullest extent permitted by applicable law, the Parties consent to the exclusive jurisdiction of the Court with respect to any dispute regarding the interpretation, implementation, or enforcement of this Stipulation and Agreed Order.

THE FOREGOING STIPULATION IS HEREBY APPROVED AND SO ORDERED

Dated: _____, 2026

Houston, Texas

_____

UNITED STATES BANKRUPTCY JUDGE

Dated: October 2, 2026
STIPULATED AND AGREED TO BY:

/s/ Timothy A. Davidson
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