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

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

REORGANIZED DEBTORS' THIRTY-SECOND OMNIBUS OBJECTION TO CERTAIN CLAIMS (INSUFFICIENT DOCUMENTATION CLAIMS)

THIS IS AN OBJECTION TO YOUR CLAIM. THIS OBJECTION ASKS THE COURT TO DISALLOW THE CLAIM THAT YOU FILED IN THE BANKRUPTCY CASE. IF YOU DO NOT FILE A RESPONSE WITHIN 30 DAYS AFTER THE OBJECTION WAS SERVED ON YOU, YOUR CLAIM MAY BE DISALLOWED WITHOUT A HEARING.

TO THE CLAIMANTS WHOSE CLAIMS ARE SUBJECT TO THIS OBJECTION:

YOUR SUBSTANTIVE RIGHTS MAY BE AFFECTED BY THIS OBJECTION AND ANY FURTHER OBJECTIONS THAT MAY BE FILED IN THE CHAPTER 11 CASES.

THE RELIEF SOUGHT IN THIS OBJECTION IS WITHOUT PREJUDICE TO THE RIGHTS OF THE REORGANIZED DEBTORS AND THEIR ESTATES OR OTHER PARTIES IN INTEREST TO PURSUE FURTHER OBJECTIONS AGAINST THE CLAIMS LISTED HEREIN AND OTHER CLAIMS FILED IN THE CHAPTER 11 CASES.

[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 these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1200, Denver, Colorado 80237.

The above-captioned reorganized debtors (prior to the Effective Date,[2] collectively, the "***Debtors***" and after the Effective Date, collectively, the "***Reorganized Debtors***") respectfully state the following in support of this omnibus claims objection (this "***Objection***").

RELIEF REQUESTED

1. By this Objection, the Reorganized Debtors seek entry of an order, substantially in the form attached hereto (the "***Proposed Order***"), disallowing and expunging the claims listed on **Schedule 1** to the Proposed Order (the "***Insufficient Documentation Claims***") in their entirety because each Insufficient Documentation Claim fails to include documentation sufficient to substantiate the asserted liability or amount and, based on a review of the Reorganized Debtors' books and records, the Reorganized Debtors are not aware of any amount owed on account of each such Insufficient Documentation Claim.

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the Southern District of Texas (the "***Court***") has jurisdiction over this matter pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and the Court may enter a final order consistent with Article III of the United States Constitution.

3. Each Insufficient Documentation Claim that is the subject of this Objection was asserted on a proof of claim form (each, a "***Proof of Claim***" and collectively, the "***Claim Forms***") filed with the Claims and Noticing Agent (as defined below). By seeking recovery from the Reorganized Debtors' estates based on the filing of a Proof of Claim, the holders of the Insufficient

[2] Capitalized terms used but not defined herein shall have the meanings ascribed to them in the *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 1055, Ex. A] (together with all supplemental or supporting documentation related thereto, the "***Plan***"), as applicable.

Documentation Claims (each a "***Claimant***" and collectively the "***Claimants***") have submitted to the Court's jurisdiction over this matter.

4. Venue of the Chapter 11 Cases and this Objection in this district is proper under 28 U.S.C. §§ 1408 and 1409.

5. The statutory and legal predicates for the relief requested herein are sections 105(a) and 502 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "***Bankruptcy Code***"), Rule 3007 of the Federal Rules of Bankruptcy Procedure (the "***Bankruptcy Rules***"), Rule 3007-1 of the Bankruptcy Local Rules for the Southern District of Texas (the "***Bankruptcy Local Rules***"), and the Procedures for Complex Cases in the Southern District of Texas.

BACKGROUND

6. On August 20, 2025, the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Chapter 11 Cases are being jointly administered, for procedural purposes only, pursuant to Rule 1015(b) of the Bankruptcy Rules and Rule 1015-1 of the Bankruptcy Local Rules. The factual background regarding the Debtors, including their business, their capital structure, and the events leading to the commencement of the Chapter 11 Cases is set forth in the *Declaration of Chad J. Shandler in Support of Chapter 11 Petitions and First-Day Relief* [Docket No. 14].

7. On December 15, 2025, the Court entered the Confirmation Order[3] which, among other things, confirmed the Plan. The Effective Date occurred on December 29, 2025.

CLAIMS RECONCILIATION PROCESS

8. On August 21, 2025, the Court entered the *Order Establishing (A) Bar Dates and Related Procedures for Filing Proofs of Claim; (B) Approving the Form and Manner of Notice*

[3] Docket No. 1055.

Thereof; and (C) Granting Related Relief [Docket No. 66] (the "***Bar Date Order***") setting, *inter alia*, (i) October 1, 2025, as the deadline for non-governmental creditors and interest holders to file claims in the Chapter 11 Cases (the "***General Bar Date***"), and (ii) February 16, 2026, at 5:00 p.m. (prevailing Central Time) as the deadline for all governmental units (as defined in section 101(27) of the Bankruptcy Code) to assert a claim (as defined in section 101(5) of the Bankruptcy Code) that arose on or prior to the Petition Date (the "***Governmental Bar Date***" and together with the General Bar Date, as applicable, depending on whether the claimant is a governmental unit or non-governmental unit, the "***Claims Bar Date***").

9. The Bar Date Order establishes certain requirements that a filed claim must satisfy to be considered valid. A filed claim must, among other things, "set forth with specificity the legal and factual basis for the alleged claim," and "include supporting documentation or an explanation as to why such documentation is not available." Bar Date Order, ¶ 7. If such filed claims are not properly submitted prior to the Claims Bar Date, the Bar Date Order provides that the relevant claimant "shall not be treated as a creditor with respect to such claim for purposes of voting and ***distribution***." *Id.* at ¶ 20 (emphasis added).

10. On August 23, 2025, the Reorganized Debtors' claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global (the "***Claims and Noticing Agent***"), served notice of the Claims Bar Date (the "***Bar Date Notice***") to potential claimants in accordance with the procedures set forth in the Bar Date Order, and, as necessary, supplemented such service. *See* Bar Date Affidavits of Service.[4] Also, as certified at Docket No. 142, in accordance with the

[4] "***Bar Date Affidavits of Service***" means, collectively, (i) *Certificate of Service* [Docket No. 113]; (ii) *Certificate of Service* [Docket No. 353]; (iii) *Supplemental Certificate of Service* [Docket No. 400]; (iv) *Supplemental Certificate of Service* [Docket No. 442]; (v) *Supplemental Certificate of Service* [Docket No. 492]; (vi) *Supplemental Certificate of Service* [Docket No. 602]; (vii) *Supplemental Certificate of Service* [Docket No. 603]; (viii) *Supplemental Certificate of Service* [Docket No. 700]; (ix) *Supplemental Certificate of Service* [Docket No. 727]; (x) *Supplemental Certificate of Service* [Docket No. 1067]; (xi) *Supplemental Certificate of Service* [Docket No. 1127]; (xii) *Supplemental Certificate of Service* [Docket No. 1143]; (xiii) *Supplemental Certificate of Service*

Bar Date Order, the Reorganized Debtors published the Bar Date Notice in *The New York Times* on August 26, 2025. *See Affidavit of Publication of the Notice of Deadline for the Filing of Proofs of Claim, Including for Claims Asserted Under Section 503(b)(9) of the Bankruptcy Code in the New York Times* [Docket No. 142].

11. The Reorganized Debtors also listed numerous claims in their Schedules[5] (such claims, along with the claims asserted in each proof of claim filed in the Chapter 11 Cases, collectively, the "***Claims***"), some of which have been satisfied under the authority granted to the Reorganized Debtors pursuant to certain "first day" orders and other orders entered in the Chapter 11 Cases. A database of all Claims is being maintained by the Reorganized Debtors' Claims and Noticing Agent (the "***Claims Register***").[6]

12. On February 19, 2026, the Court entered the *Order Approving Procedures for Reorganized Debtors' Filing of Omnibus Claims Objections and Granting Related Relief* [Docket No. 1313] (the "***Omnibus Objection Procedures Order***") approving the procedures for filing and resolving omnibus objections to Claims asserted against the Reorganized Debtors in the Chapter 11 Cases appended to the Omnibus Objection Procedures Order as Exhibit 1 (the "***Objection Procedures***"). The Objection Notice (as defined in the Objection Procedures) and the Objection Procedures will be served on the holders of the Insufficient Documentation Claims along with this Objection.

[Docket No. 1148]; (xiv) *Supplemental Certificate of Service* [Docket No. 1184]; (xv) *Supplemental Certificate of Service* [Docket No. 1285]; and (xvi) *Supplemental Certificate of Service* [Docket No. 1320].

[5] On September 7, 2025, the Reorganized Debtors filed their respective schedules of assets and liabilities (the "***Schedules***") and statements of financial affairs [Docket Nos. 177–322], pursuant to Bankruptcy Rule 1007.

[6] Under section 1111(a) of the Bankruptcy Code, scheduled claims are treated as proofs of claim. *See* 11 U.S.C. § 1111(a) ("A proof of claim . . . is deemed filed under section 501 of this title for any claim . . . that appears in the schedules . . . except a claim . . . that is scheduled as disputed, contingent, or unliquidated.").

13. Pursuant to the Plan, the Claims Objection Deadline was initially March 29, 2026 (*i.e.*, the date that was ninety (90) days after the occurrence of the Effective Date), subject to the Reorganized Debtors' right to seek a further extension of such deadline in accordance with the Plan.[7]

14. On September 28, 2026, the Court entered the *Order Granting Reorganized Debtors' Third Motion for Entry of an Order Extending the Time to File and Serve Objections to Claims* [Docket No. 1780], which extended the Claims Objection Deadline through and including December 28, 2026, subject to the Reorganized Debtors' right to seek a further extension of such deadline in accordance with the Plan.

THE INSUFFICIENT DOCUMENTATION CLAIMS

15. The Reorganized Debtors' review of the Claims Register and applicable Claim Forms allowed them to identify the Insufficient Documentation Claims. This Objection seeks to disallow and expunge the Insufficient Documentation Claims in their entirety because each Insufficient Documentation Claim fails to include documentation sufficient to substantiate the asserted liability or amount and, based on a review of the Reorganized Debtors' books and records, the Reorganized Debtors are not aware of any liability on account of each such Insufficient Documentation Claim.

16. As attested to in the *Affidavit of Kenneth Shepard in Support of Reorganized Debtors' Thirty-Second Omnibus Objection to Certain Claims (Insufficient Documentation Claims)*, attached hereto as **Exhibit A**, based on their review of the Claims Register and applicable Claim Forms, the Reorganized Debtors and their advisors identified each Insufficient

[7] *See* Plan, p. 3 (defining "Claims Objection Deadline" as "ninety (90) days after the Effective Date … which dates may be extended pursuant to an order of the Bankruptcy Court upon a motion Filed by the Reorganized Debtors.").

Documentation Claim listed on **Schedule 1** to the Proposed Order as failing to provide documentation sufficient to substantiate the asserted liability or amount. To identify the Insufficient Documentation Claims, the Reorganized Debtors:

(a) reviewed the Claims Register and applicable Claim Forms to identify Claims that did not include documentation sufficient to substantiate the asserted liability or amount (including, for the avoidance of doubt, Claims that failed to include any supporting documentation);

(b) reviewed the information included in or with each Claim Form, including any statement concerning the absence or unavailability of supporting documentation, and determined that such information was insufficient to substantiate the asserted liability or permit the Reorganized Debtors to reconcile the Claim (including, in certain instances, because the applicable Claimant failed to include any supporting documentation); and

(c) reviewed the Reorganized Debtors' books and records and determined that such books and records do not reflect any amount owed on account of each Insufficient Documentation Claim.

17. The Reorganized Debtors hereby request that the Insufficient Documentation Claims be disallowed in their entirety and expunged.

BASIS FOR RELIEF

18. Section 502 of the Bankruptcy Code provides, in pertinent part, that: "[a] claim or interest, proof of which is filed under section 501 of [the Bankruptcy Code], is deemed allowed, unless a party in interest… objects." 11 U.S.C. § 502. Moreover, section 502(b)(1) of the Bankruptcy Code provides, in relevant part, that a claim may not be allowed if "such claim is unenforceable against the debtor and property of the debtor, under any agreement or applicable law . . . ." 11 U.S.C. § 502(b)(1). Bankruptcy Rule 3007 provides certain grounds upon which "objections to more than one claim may be joined in a single objection." FED. R. BANKR. P. 3007(d). This includes objections on the grounds that claims should be disallowed because they "were presented in a form that does not comply with applicable rules and the objection states that

the objector is therefore unable to determine a claim's validity . . . ." FED. R. BANKR. P. 3007(d)(2)(F).

19. As set forth in Bankruptcy Rule 3001(f), a properly executed and filed proof of claim constitutes *prima facie* evidence of the validity and the amount of the claim under section 502(a) of the Bankruptcy Code. *See, e.g.*, *In re Jack Kline Co., Inc.*, 440 B.R. 712, 742 (Bankr. S.D. Tex. 2010). A proof of claim loses the presumption of *prima facie* validity under Bankruptcy Rule 3001(f) if an objecting party refutes at least one of the allegations that are essential to the claim's legal sufficiency. *See In re Fidelity Holding Co., Ltd.*, 837 F.2d 696, 698 (5th Cir. 1988). Once such an allegation is refuted, the burden reverts to the claimant to prove the validity of its claim by a preponderance of the evidence. *Id*. Despite this shifting burden during the claim objection process, "the ultimate burden of proof always lies with the claimant." *In re Armstrong*, 347 B.R. 581, 583 (Bankr. N.D. Tex. 2006) (citing *Raleigh v. Ill. Dep't of Rev.*, 530 U.S. 15 (2000)).

20. Here, the Bar Date Order expressly provides that a filed claim must, among other things, "set forth with specificity the legal and factual basis for the alleged claim," and "include supporting documentation or an explanation as to why such documentation is not available." Bar Date Order, ¶ 7; *see also* Objection Procedures, ¶ 1(h) (authorizing the Reorganized Debtors to file omnibus objections to Claims that "fail … to provide sufficient supporting documentation therefor."). As set forth above, each Insufficient Documentation Claim fails to include documentation sufficient to substantiate the asserted liability or amount. Moreover, based on the Reorganized Debtors' books and records, the Reorganized Debtors are not aware of any liability on account of the Insufficient Documentation Claims. Thus, the Insufficient Documentation Claims are subject to disallowance.

21. Accordingly, the Reorganized Debtors respectfully request that the Court enter the Proposed Order disallowing and expunging the Insufficient Documentation Claims in their entirety.

RESERVATION OF RIGHTS

22. The Reorganized Debtors reserve the right to amend, modify, or supplement this Objection, and to file additional objections to any other Claims (filed or not) that may be asserted against the Reorganized Debtors and their estates. Should one or more of the grounds of objection stated in the Objection be dismissed or overruled, the Reorganized Debtors reserve the right to object to each of the Insufficient Documentation Claims or any other Claims on any other grounds that the Reorganized Debtors discover or elect to pursue.

23. Nothing contained herein shall be deemed: (a) an admission as to the amount of, basis for, or validity of any Claim against the Reorganized Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) an impairment or waiver of the Reorganized Debtors' or any other party in interest's right to dispute any Claim against, or interest in, the Reorganized Debtors, or their property or estates; (c) a promise or requirement to pay any prepetition Claim; (d) an implication or admission that any particular Claim is of a type specified or defined in this Objection, or any order granting the relief requested by this Objection; (e) an implication, admission, or finding as to (i) the validity, enforceability, or perfection of any interest or encumbrance on the property of the Reorganized Debtors or their estates or (ii) the applicability of any exception or exclusion from property of the estate under section 541 of the Bankruptcy Code or other applicable law; (f) an impairment or waiver of any claims or causes of action which may exist against any entity; or (g) a waiver of the Reorganized Debtors' or any other party in interest's rights under the Bankruptcy Code or any other applicable law.

NOTICE

24. Notice of this Objection will be given to the Claimants, the parties on the Reorganized Debtors' Master Service List, and all parties that have requested or that are required to receive notice pursuant to Bankruptcy Rule 2002. The Reorganized Debtors submit that, under the circumstances, no other or further notice is required.

25. A copy of this Objection is available on (a) the Court's website, at www.txs.uscourts.gov and (b) the website maintained by the Claims and Noticing Agent at https://www.veritaglobal.net/ModivCare.

WHEREFORE, the Reorganized Debtors respectfully request that the Court enter the Proposed Order sustaining the Objection and granting such other and further relief as may be just and proper.

Dated: October 26, 2026

Respectfully submitted,

/s/ Timothy A. ("Tad") Davidson II

HUNTON ANDREWS KURTH LLP
Timothy A. ("Tad") Davidson II (Texas Bar No. 24012503)
Jason W. Harbour (Virginia Bar No. 68220)
Brandon Bell (Texas Bar No. 24127019)
600 Travis Street, Suite 4200
Houston, TX 77002
Telephone: (713) 220-4200
Email: taddavidson@hunton.com
jharbour@hunton.com
bbell@hunton.com

-and-

LATHAM & WATKINS LLP
Ray C. Schrock (NY Bar No. 4860631)
Keith A. Simon (NY Bar No. 4636007)
George Klidonas (NY Bar No. 4549432)
Jonathan J. Weichselbaum (NY Bar No. 5676143)
1271 Avenue of the Americas
New York, NY 10020
Telephone: (212) 906-1200
Email: ray.schrock@lw.com
keith.simon@lw.com
george.klidonas@lw.com
jon.weichselbaum@lw.com

Co-Counsel for the Reorganized Debtors

CERTIFICATE OF SERVICE

I certify that on October 26, 2026, a true and correct copy of the foregoing document was served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas on those parties registered to receive electronic notices.

/s/ Timothy A. ("Tad") Davidson II
Timothy A. ("Tad") Davidson II

Exhibit A

Shepard Affidavit

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

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

AFFIDAVIT OF KENNETH SHEPARD
IN SUPPORT OF REORGANIZED DEBTORS'
THIRTY-SECOND OMNIBUS OBJECTION TO
CERTAIN CLAIMS (INSUFFICIENT DOCUMENTATION CLAIMS)

I, Kenneth Shepard, hereby declare as follows:

1. I submit this affidavit (this "***Affidavit***") in support of the *Reorganized Debtors' Thirty-Second Omnibus Objection to Certain Claims (Insufficient Documentation Claims)* (the "***Objection***")[2] pursuant to Rule 3007-1 of the Bankruptcy Local Rules.

2. I am an executive vice president and group chief financial officer for the Reorganized Debtors. I have worked for the Reorganized Debtors for over ten years and in finance for approximately 20 years.

3. I am knowledgeable about, and familiar with, the Reorganized Debtors' day-to-day operations, business and financial affairs, books and records, and the circumstances that led to the commencement of the Chapter 11 Cases. The facts set forth in this Affidavit are based upon my

[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 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. 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 1200, Denver, Colorado 80237.

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

personal knowledge, my review of relevant documents, information provided to me by employees working under my supervision, my own reasonable inquiry, and/or my discussions with the Reorganized Debtors' other officers, directors, and restructuring advisors, including professionals at Latham & Watkins LLP, Hunton Andrews Kurth LLP, Moelis & Company, FTI Consulting, Inc., and Kurtzman Carson Consultants, LLC d/b/a Verita Global. If called upon to testify, I would testify to the facts set forth in this Affidavit. I am authorized to submit this Affidavit.

OBJECTION TO INSUFFICIENT DOCUMENTATION CLAIMS

4. Article VII of the Plan empowers the Reorganized Debtors to undertake a claims allowance process. Thus, pursuant to the Plan, the Reorganized Debtors and their advisors have identified certain Insufficient Documentation Claims which they seek to disallow and expunge in their entirety.

5. The Insufficient Documentation Claims were identified after the Reorganized Debtors:

(a) reviewed the Claims Register and applicable Claim Forms to identify Claims that did not include documentation sufficient to substantiate the asserted liability or amount (including, for the avoidance of doubt, Claims that failed to include any supporting documentation);

(b) reviewed the information included in or with each Claim Form, including any statement concerning the absence or unavailability of supporting documentation, and determined that such information was insufficient to substantiate the asserted liability or permit the Reorganized Debtors to reconcile the Claim (including, in certain instances, because the applicable Claimant failed to include any supporting documentation); and

(c) reviewed the Reorganized Debtors' books and records and determined that such books and records do not reflect any amount owed on account of each Insufficient Documentation Claim.

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 and belief.

[*Remainder of page intentionally left blank.*]

Dated: October 26, 2026

/s/Kenneth Shepard
Name: Kenneth Shepard
Title: EVP and Group Chief Financial Officer
ModivCare Solutions, LLC and its
Reorganized Debtor Affiliates

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

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

ORDER GRANTING REORGANIZED DEBTORS' THIRTY-SECOND OMNIBUS OBJECTION TO CERTAIN CLAIMS (INSUFFICIENT DOCUMENTATION CLAIMS)
[Relates to Docket No.]

Upon the objection (the "***Objection***")[2] of the Reorganized Debtors seeking entry of an order (this "***Order***") disallowing and expunging the Insufficient Documentation Claims in their entirety as set forth in **Schedule 1** hereto, all as more fully set forth in the Objection; and the Court having reviewed the Objection; and the Court having jurisdiction to consider the Objection and the relief requested therein in accordance with 28 U.S.C. § 1334; and the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that proper and adequate notice of the Objection and opportunity for a hearing on the Objection were appropriate under the circumstances and that no other or further notice is necessary, except as set forth in this Order; and all responses, if any, to the Objection

[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 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. 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 1200, Denver, Colorado 80237.

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

having been withdrawn, resolved, or overruled; and upon the record herein; and after due deliberation thereon; and the Court having determined that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and the Court having determined that the relief requested in the Objection is in the best interests of the Reorganized Debtors, their estates, their creditors, and other parties in interest, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. The Objection is GRANTED, as set forth herein.

2. Each Insufficient Documentation Claim listed on **Schedule 1** is disallowed and expunged in its entirety.

3. The Claims and Noticing Agent is authorized to update the Claims Register maintained in the Chapter 11 Cases to reflect the relief granted in this Order.

4. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in the Objection or this Order shall be deemed a waiver of the rights of the Reorganized Debtors to object to any Claim, and shall not constitute an admission of liability by the Reorganized Debtors with respect to any Proof of Claim or application for administrative expenses.

5. Each Insufficient Documentation Claim and the Reorganized Debtors' objections to each Insufficient Documentation Claim constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each Insufficient Documentation Claim.

6. Nothing in the Objection or this Order shall be deemed or construed: (a) as an admission as to the validity of any Insufficient Documentation Claim against the Reorganized Debtors; (b) as a waiver of the Reorganized Debtors' rights to dispute or otherwise object to any

Claim on any grounds or basis; or (c) to waive or release any right, claim, defense, or counterclaim of the Reorganized Debtors, or to estop the Reorganized Debtors from asserting any right, claim, defense, or counterclaim (including setoff).

7. Notice of the Objection as provided therein shall be deemed good and sufficient and the requirements of the Bankruptcy Rules and the Bankruptcy Local Rules are satisfied by such notice.

8. Notwithstanding any applicable Bankruptcy Rules to the contrary, the terms and conditions of this Order are immediately effective and enforceable upon its entry.

9. The Reorganized Debtors are authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Objection.

10. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Signed: _____, 2026

_____
UNITED STATES BANKRUPTCY JUDGE

SCHEDULE 1

(INSUFFICIENT DOCUMENTATION CLAIMS)

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
1	ANSPACH, CHRISTOPHER	ModivCare Inc.	563	09/22/2025	General Unsecured	$150.80
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$150.80
2	Armstrong, Alysshia M	ModivCare Inc.	103	09/09/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$0.00
3	BACA, ELIZABETH	ModivCare Solutions, LLC	1618	10/01/2025	General Unsecured	$1,373.40
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$1,373.40
4	BD Health Services	ModivCare Inc.	928	09/29/2025	General Unsecured	$489.53
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$489.53
5	BONG, KENNETH	ModivCare Inc.	1357	09/30/2025	General Unsecured	$0.00
					Priority	$3,634.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$3,634.00
6	Bowling, Kathy Sue	ModivCare Inc.	366	09/16/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$0.00
7	Bragg, Joan	ModivCare Inc.	1660	10/01/2025	General Unsecured	$150.50
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$150.50
8	BROCK, BRITTNEY L.	ModivCare Inc.	1691	10/01/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$5,000.00
					Admin Priority	$0.00
					Total	$5,000.00
9	BROWN, ANNIE L	ModivCare Inc.	423	09/17/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$26,000.00
					Total	$26,000.00
10	Calbert, Victor	ModivCare Inc.	1688	10/01/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$4,800.00
					Total	$4,800.00
11	Cormier, Pamela	ModivCare Inc.	639	09/23/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$0.00
12	CROUSE, MATTHEW	TriMed, LLC	185	09/11/2025	General Unsecured	$0.00
					Priority	$20,950.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$20,950.00
13	CRUZ, JULIA V	All Metro Aids Inc.	795	09/26/2025	General Unsecured	$3,000.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$3,000.00
14	Denney, Ryan P	ModivCare Inc.	1458	10/01/2025	General Unsecured	$8,090.00
					Priority	$0.00
					Secured	$27,010.00
					Admin Priority	$0.00
					Total	$35,100.00
15	Donaldson, Mark P	ModivCare Inc.	2246	01/12/2026	General Unsecured	$100.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$100.00
16	DONKOR, PATRICIA	All Metro Home Care Services of New York, Inc.	561	09/22/2025	General Unsecured	$908.31
					Priority	$0.00
					Secured	$908.31
					Admin Priority	$0.00
					Total	$1,816.62
17	Dove, Tanya	ModivCare Inc.	1686	10/01/2025	General Unsecured	$1,000.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$1,000.00
18	Drumgold, Naomi	Caregivers America, LLC.	1630	10/01/2025	General Unsecured	$0.00
					Priority	$300.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$300.00
19	ELLIS, JENINE	ModivCare Inc.	471	9/19/2025	General Unsecured	$0.00
					Priority	$5,000.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$5,000.00
20	EPISKOPOSYAN, VARDAN	ModivCare Inc.	478	09/18/2025	General Unsecured	$0.00
					Priority	$700.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$700.00

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
21	FERKO, LORETTA	All Metro Field Service Workers Payroll Services Corporation	1342	10/01/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$2,625.00
					Total	$2,625.00
22	Finkelstein, Raphael P	ModivCare Inc.	1075	09/30/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$0.00
23	Fossett, Betty	ModivCare Inc.	946	09/29/2025	General Unsecured	$5,450.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$5,450.00
24	FREEMAN, MELECIA	ModivCare Solutions, LLC	937	09/29/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$4,500.00
					Total	$4,500.00
25	Gooden, Latasha	ModivCare Solutions, LLC	176	09/11/2025	General Unsecured	$1,700.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$1,700.00
26	GRAY, CARA H	ModivCare Inc.	1421	10/01/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$0.00
27	Green, Sharonda	Provado Technologies, LLC	1683	10/01/2025	General Unsecured	$1,000.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$1,000.00
28	HALPERN, BRUCE	ModivCare Solutions, LLC	776	09/25/2025	General Unsecured	$64.32
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$64.32
29	Harper, Shelah	CareGivers America Home Health Services, LLC	1033	09/30/2025	General Unsecured	$0.00
					Priority	$6,400.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$6,400.00
30	HAYNES, THOMAS	ModivCare Inc.	891	09-28-26	General Unsecured	$5,500.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$5,500.00
31	Hicks, Tayla	ModivCare Solutions, LLC	173	09/12/2025	General Unsecured	$250.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$250.00
32	Hill, John	ModivCare Inc.	636	09/23/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$0.00
33	HOWER, SHAWNA	ModivCare Inc.	283	09/16/2025	General Unsecured	$1,193.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$1,193.00
34	JACKSON, ALEXIS	ModivCare Inc.	510	09/22/2025	General Unsecured	$15,000.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$15,000.00
35	Lacroix, Sara Georgine	ModivCare Inc.	1603	10/01/2025	General Unsecured	$0.00
					Priority	$20,979.33
					Secured	$0.00
					Admin Priority	$0.00
					Total	$20,979.33
36	Layport, Aimee	ModivCare Inc.	1081	09/30/2025	General Unsecured	$2,206.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$2,206.00
37	Lewis, Dwayne	ModivCare Inc.	919	09/29/2025	General Unsecured	$385.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$385.00
38	Malone, Tambra	ModivCare Inc.	1659	10/01/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$400.00
					Admin Priority	$0.00
					Total	$400.00
39	Matamoros, Shirley	All Metro Home Care Services of New York, Inc.	1346	10/01/2025	General Unsecured	$0.00
					Priority	$1,069.60
					Secured	$0.00
					Admin Priority	$0.00
					Total	$1,069.60
40	MCCLELLAN, KAYLA	ModivCare Solutions, LLC	1101	09/30/2025	General Unsecured	$0.00
					Priority	$100.00
					Secured	$0.00
					Admin Priority	$367.00
					Total	$467.00

#	Claimant Name	Debtor against Whom the Claim was Filed	Claim No.	Filing Date of Claim	Asserted Claim Amount	
					Claim Nature	Claim Amount
41	Newsom, Kiamesha	ModivCare Inc.	496	09/19/2025	General Unsecured	$0.00
					Priority	$8,000.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$8,000.00
42	NEWTON, MICHAELA	ModivCare Solutions, LLC	1104	09/30/2025	General Unsecured	$686.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$686.00
43	OTOOLE, BRIAN	Metropolitan Medical Transportation IPA, LLC	571	09/22/2025	General Unsecured	$138.60
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$138.60
44	Quaglio, Jennifer	ModivCare Inc.	1282	09/30/2025	General Unsecured	$0.00
					Priority	$20,000.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$20,000.00
45	Raza, Shereen	ModivCare Inc.	909	09/29/2025	General Unsecured	$1,454.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$1,454.00
46	Rodriguez Camacho, Samely	A & B Homecare Solutions, L.L.C.	505	09/19/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$5,000.00
					Total	$5,000.00
47	RODRIGUEZ, JAZMIN A	ModivCare Inc.	916	9/27/2025	General Unsecured	$0.00
					Priority	$17,150.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$17,150.00
48	RONALD MCDONALD HOUSE CHARITIES OF COLUMBIA	ModivCare Solutions, LLC	1468	09/30/2025	General Unsecured	$48,645.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$14,595.00
					Total	$63,240.00
49	Rutan, Robin	ModivCare Inc.	1464	10/01/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$0.00
50	SADLO, VIVIEN	ModivCare Solutions, LLC	1609	10/01/2025	General Unsecured	$20,000.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$20,000.00
51	SCHETROMPF, KEVIN	ModivCare Inc.	622	09/21/2025	General Unsecured	$0.00
					Priority	$2,378.48
					Secured	$0.00
					Admin Priority	$3,547.86
					Total	$5,926.34
52	Schrankel, Steven	ModivCare Solutions, LLC	593	09/22/2025	General Unsecured	$708.50
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$708.50
53	SHERLOCK, DIANE	ModivCare Inc.	305	09/16/2025	General Unsecured	$253.95
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$253.95
54	STEVENS, SHERLENE	ModivCare Inc.	757	9/24/2025	General Unsecured	$1,996,200.00
					Priority	$3,800.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$2,000,000.00
55	Timarky, Enileska	ModivCare Inc.	419	09/17/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$260.00
					Total	$260.00
56	TOMBERLIN, TRACY	ModivCare Inc.	887	09/28/2025	General Unsecured	$1,443.72
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$1,443.72
57	Tyree, Candice	ModivCare Inc.	1118	09/30/2025	General Unsecured	$0.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$0.00
58	White, Danielle	ModivCare Solutions, LLC	612	09/20/2025	General Unsecured	$600.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$600.00
59	Wilson, Ivory	ModivCare Inc.	915	09/26/2025	General Unsecured	$713.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$713.00
60	YOUNG, ARETTA	ModivCare Inc.	1622	10/01/2025	General Unsecured	$6,210.00
					Priority	$0.00
					Secured	$0.00
					Admin Priority	$0.00
					Total	$6,210.00