Docket #1763 Date Filed: 09/03/2026

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' THIRD MOTION FOR ENTRY OF AN ORDER EXTENDING THE TIME TO FILE AND SERVE OBJECTIONS TO CLAIMS

If you object to the relief requested, you must respond in writing. Unless otherwise directed by the Court, you must file your response electronically at https://ecf.txsb.uscourts.gov/ within twenty-one days from the date this motion was filed. If you do not have electronic filing privileges, you must file a written objection that is actually received by the clerk within twenty-one days from the date this motion was filed. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

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 motion (the "***Motion***"):

RELIEF REQUESTED

1. The Reorganized Debtors seek entry of an order, substantially in the form attached hereto (the "***Order***"), extending the Claims Objection Deadline by 90 days from the present

[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.

[2] Capitalized terms used but not defined herein have the meanings given to them in the Plan (as defined herein).

deadline of September 27, 2026,[3] through and including December 28, 2026, without prejudice to the rights of the Reorganized Debtors to request further extensions of the Claims Objection Deadline to the extent provided by the *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates* [Docket No. 959] (as may be amended, modified, and supplemented, the "***Plan***").

JURISDICTION AND VENUE

2. The United States Bankruptcy Court for the Southern District of Texas (the "***Court***") has jurisdiction to consider this Motion under 28 U.S.C. § 1334. This is a core proceeding under 28 U.S.C. § 157, and this Court may enter a final order consistent with Article III of the United States Constitution. Venue is proper under 28 U.S.C. §§ 1408 and 1409.

3. The bases for the relief requested herein are section 105(a) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "***Bankruptcy Code***"), rule 9006 of the Federal Rules of Bankruptcy Procedure (the "***Bankruptcy Rules***"), rule 9013-1 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

4. On August 20, 2025 (the "***Petition Date***"), the Debtors filed voluntary petitions for relief in this Court commencing cases (the "***Chapter 11 Cases***") under chapter 11 of the Bankruptcy Code. 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

[3] Because September 27, 2026, falls on a Sunday, the current Claims Objection Deadline continues through Monday, September 28, 2026, pursuant to Bankruptcy Rule 9006(a)(1)(C). The 90 day period thereafter ends on Sunday, December 27, 2026, and therefore continues through Monday, December 28, 2026.

in the *Declaration of Chad J. Shandler in Support of Chapter 11 Petitions and First-Day Relief* [Docket No. 14].

5. On December 15, 2025, the Court entered the Order *(I) Confirming the 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***"), which, among other things, confirmed the Plan. On December 29, 2025, the Plan was substantially consummated and the Effective Date occurred.[4]

6. The Plan provides that the Reorganized Debtors are authorized to object to scheduled claims and proofs of claims and interests. *See* Plan, Art. VII § 7.2.

7. 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 Thereof, and (C) Granting Related Relief* [Docket No. 66] (the "***Bar Date Order***") pursuant to which the Court, among other things, established October 1, 2025, at 5:00 p.m. (prevailing Central Time) (the "***General Bar Date***"), as the deadline for all non-governmental entities[5] holding or wishing to assert a "claim" (as defined in section 101(5) of the Bankruptcy Code) against the Debtors that arose on or prior to the Petition Date to file Proofs of Claim.

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[4] *See Notice of (I) Entry of Order Confirming Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates, (II) Occurrence of Such Plan's Effective Date, and (III) Related Deadlines With Respect To Administrative Expense and Rejection Damage Claims* [Docket No. 1134].

[5] The deadline for all governmental units asserting a "claim" (as defined in section 101(5) of the Bankruptcy Code) against the Debtors that arose on or prior to the Petition Date to file written proof of such claim was February 16, 2026, at 5:00 p.m. (prevailing Central Time) (together with the General Bar Date, the "***Bar Dates***").

CLAIM OBJECTION AND RECONCILIATION PROCESS

8. The Plan provides that the deadline for the Reorganized Debtors to object to claims (the "***Claims Objection Deadline***") is "ninety (90) days after the Effective Date, *provided that*, the Claims Objection Deadline is ninety (90) days after the Governmental Bar Date for a Proof of Claim filed by a governmental unit . . . which dates may be extended pursuant to an order of the Bankruptcy Court upon a motion filed by the Reorganized Debtors."[6] As the Effective Date occurred on December 29, 2025, the initial Claims Objection Deadline with respect to claims filed by non-governmental units was March 30, 2026. Further, as the Governmental Bar Date occurred on February 16, 2026, the initial Claims Objection Deadline with respect to claims filed by Governmental Units was May 18, 2026.

9. On March 9, 2026, the Reorganized Debtors filed the *Reorganized Debtors' Motion for Entry of an Order Extending the Time to File and Serve Objections to Claims* [Docket No. 1363] (the "***First Extension Motion***"). The Court entered an order granting the First Extension Motion on April 1, 2026 [Docket No. 1400], which extended the Claims Objection Deadline, as such deadline is applicable to claims filed by both non-Governmental Units and Governmental Units, to June 29, 2026. On June 16, 2026, the Reorganized Debtors filed the *Reorganized Debtors' Second Motion for Entry of an Order Extending the Time to File and Serve Objections to Claims* [Docket No. 1612] (the "***Second Extension Motion***"). On July 13, 2026, the Court entered an order granting the Second Extension Motion [Docket No. 1649], which further extended the Claims Objection Deadline to September 27, 2026.

10. Since the Effective Date, the Reorganized Debtors and their advisors have been diligently working to reconcile the over 2,000 claims filed in the Chapter 11 Cases. Since the

[6] *See* Plan, Art. I(A).

Effective Date, and as of the filing of this Motion, the Reorganized Debtors have filed twenty omnibus claim objections,[7] in addition to other individual claim objections, resulting in the disallowance and expungement of over 800 claims. The Reorganized Debtors continue to work through the claims-reconciliation process and intend to file further omnibus and individual claim objections.

11. While the Reorganized Debtors have worked diligently to complete the claims resolution process—such diligent efforts resulting in the disallowance and expungement of over 800 claims as of the filing of this Motion, it has now become clear that certain claims will not be able to be resolved before the current Claims Objection Deadline. As a result, it is necessary to extend the Claims Objection Deadline. At this time, the Reorganized Debtors are requesting a 90 day extension of the Claims Objection Deadline through and including December 28, 2026, without prejudice to seeking further extensions of the Claims Objection Deadline as may be necessary.

BASIS FOR RELIEF

12. Section 105(a) of the Bankruptcy Code provides that the Court may issue an order that is necessary or appropriate to carry out the provisions of the Bankruptcy Code. 11 U.S.C. § 105(a). Pursuant to Bankruptcy Rule 9006(b)(1), when "a court order requires or allows an act to be performed at or within a specified period . . . the court may—at any time and for cause—extend the time to act if with or without a motion or notice, a request to extend is made before the period (or a previously extended period) expires." Fed. R. Bankr. P. 9006(b). As set forth above, the Plan also provides for an extended Claims Objection Deadline to be set by order of the Court.

[7] *See* Docket Nos. 1257, 1383-1388, 1395-1398, 1661-1665, 1736, and 1745-1747.

Plan, Art. I(A) (defining "Claims Objection Deadline" and noting such deadline "may be extended pursuant to an order of the Bankruptcy Court upon a motion Filed by the Reorganized Debtors").

13. To allow the Reorganized Debtors sufficient time to review and assess the merits of the remaining filed Proofs of Claim against the Debtors, the Reorganized Debtors respectfully request an extension of the Claims Objection Deadline by 90 days, through and including December 28, 2026. Rather than objecting to claims merely to satisfy the current Claims Objection Deadline, the Reorganized Debtors believe it is in the best interests of all parties to continue the review and reconciliation process (which will permit a more efficient use of the Reorganized Debtors' resources).

14. An extension of the Claims Objection Deadline will ensure that the Reorganized Debtors complete the claim-reconciliation process, do not unnecessarily forfeit valid defenses to claims, do not expend resources in objecting to claims that could otherwise be resolved consensually, and do not otherwise permit claims to be allowed in amounts that are not justified. Accordingly, the Reorganized Debtors respectfully submit that an extension of the Claims Objection Deadline by 90 days, through and including December 28, 2026, is authorized by the Bankruptcy Code and the terms of the Plan, and should be granted.

NOTICE

15. Notice of this Motion will be given to 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.

16. A copy of this Motion 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.

[*Remainder of page intentionally left blank*]

Dated: September 3, 2026

Respectfully submitted,

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

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Co-Counsel for the Reorganized Debtors

Certificate of Service

I certify that on September 3, 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

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' THIRD MOTION FOR ENTRY OF AN ORDER EXTENDING THE TIME TO FILE AND SERVE OBJECTIONS TO CLAIMS
[Relates to Docket No.]

Upon the Motion (the "***Motion***")[2] of the above-captioned Reorganized Debtors seeking entry of an order (this "***Order***") extending the Claims Objection Deadline, as more fully set forth in the Motion; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. § 1334; and it appearing that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and it appearing that the Court may enter a final order consistent with Article III of the United States Constitution; and it appearing that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and it appearing that notice of the Motion and the opportunity for a hearing on the Motion were appropriate under the circumstances and no other notice need be provided; and the Court having reviewed the Motion and all responses, if any, to the Motion having been withdrawn, resolved, or overruled; and the Court having determined that the legal and factual

[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.

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

bases set forth in the Motion establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefore, it is **HEREBY ORDERED THAT**:

1. The Claims Objection Deadline is hereby extended by 90 days, through and including **December 28, 2026**.[3]

2. This Order is without prejudice to the rights of the Reorganized Debtors to seek further extension of the Claims Objection Deadline.

3. The Reorganized Debtors are authorized to take such actions and to execute such documents as may be necessary to implement the relief granted by this Order.

4. Notwithstanding any provision in the Bankruptcy Rules to the contrary, this Order shall be immediately effective and enforceable upon its entry.

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

Signed: _____

ALFREDO R. PÉREZ
UNITED STATES BANKRUPTCY JUDGE

[3] Calculated pursuant to Bankruptcy Rule 9006.