UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

----------x

In re

MODIVCARE INC., *et al.*,

Reorganized Debtors.[1]

Chapter 11

Case No. 25-90309 (ARP)

(Jointly Administered)

----------x

DAVID MOUNTS GONZALES'S STATEMENT IN LIEU WITNESS AND EXHIBIT LIST

Movant, David Mounts Gonzales ("Movant"), files this statement in lieu of filing a Witness and Exhibit List in advance of the hearing scheduled for October 2 at 10:00 am Central Time. The parties have agreed, and have advised Chamber, that the initial hearing on Movant's application will be non-evidentiary at which the parties will only take up procedural issues and make purely legal arguments and depending on the Court's ruling on such issues, a subsequent evidentiary hearing could then be set. Accordingly, Movant does not plan to call witnesses or offer exhibits into evidence at the hearing.

Dated: October 2, 2026

Respectfully submitted,

/s/ Steven Owens
Steven Owens
Texas State Bar No. 24098212
SDTX Fed. Bar No. 3504157
SOwens@kasowitz.com
KASOWITZ LLP
1415 Louisiana Street, Suite 2100

[1] A complete list of the Reorganized Debtors in these 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 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 1100 & 1200, Denver, Colorado 80237.

2590309261002000000000003

Houston, TX 77002
Tel. (713) 220-8822
Fax. (713) 583-3387

Of Counsel:
Daniel J. Fetterman (admitted *Pro Hac Vice)*
DFetterman@kasowitz.com
David J. Mark (admitted *Pro Hac Vice*)
DMark@kasowitz.com
KASOWITZ LLP
1633 Broadway,
New York, NY 10019
Tel. (212) 506-1700

Counsel to David Mounts Gonzales