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'
RESPONSE IN LIEU OF SUPPLEMENTAL BRIEFING
[Relates to Docket Nos. 1638, 1657, 1681, and 1800]

The above-captioned reorganized debtors (prior to the Effective Date,[2] collectively, the "***Debtors***" and after the Effective Date, collectively, the "***Reorganized Debtors***"), by and through their undersigned counsel, hereby submit this Response in Lieu of Supplemental Briefing (this "***Response***") in connection with: (i) the *Motion for Limited Relief from Plan Injunction* [Docket No. 1638] (the "***Motion***") filed pro se by Ms. Lus Lucy Rosario (the "***Movant***"); and (ii) the Court's *Order on Known Creditor Issue and Request for Supplemental Briefing* [Docket No. 1800] (the "***Known Creditor Order***"), and, in support thereof, respectfully state as follows:

RESPONSE

1. The Reorganized Debtors have considered the Court's ruling, in which the Court found that the Movant constituted a known creditor, and, after due deliberation thereon, the

[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 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.

Reorganized Debtors have elected not to submit further briefing on the Motion. The Reorganized Debtors do not oppose the Court's entry of the proposed order the Movant appended to her Motion at Docket No. 1638-1 a copy of which is appended hereto as **Exhibit A** for ease of the Court's reference.

[*Remainder of page intentionally left blank.*]

Dated: November 2, 2026

Respectfully submitted,

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

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Co-Counsel for the Reorganized Debtors

CERTIFICATE OF SERVICE

I certify that on November 2, 2026, a true and correct copy of the foregoing document was served by: (i) 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; and (ii) email on Ms. Lus Lucy Rosario (via rosariolucy8@gmail.com).

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

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS

In re: ModivCare Inc., et al.
Case No. 25-90309
Debtors.

PROPOSED ORDER

Upon consideration of the **Motion for Limited Relief from Plan Injunction**, the Court finds that the requested relief is limited and does not seek recovery from the Debtors or estate assets.

IT IS ORDERED that the Plan Injunction is modified solely to permit Movant to liquidate the prepetition tort claim in a non-bankruptcy forum for the limited purpose of determining liability and damages, if any, and insurance coverage, if available.

Any recovery shall be limited exclusively to applicable third-party insurance proceeds, to the extent such coverage exists.

SO ORDERED.

_____

UNITED STATES BANKRUPTCY JUDGE

Date: _____

CERTIFICATE OF SERVICE

I certify that on 6/29/26, a true and correct copy of the Motion for Limited Relief from Plan Injunction and Proposed Order was served by United States Mail upon the following parties:

Clerk

Office of the Clerk /United States Bankruptcy Court
Southern District of Texas
Houston Division
P.O. Box 61010
Houston, TX 77208

Debtors' counsel

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Claims agent

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RDC 99

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FCM LETTER
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JUN 29, 2026

$6.08

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United States Courts
Southern District of Texas
FILED

JUL 07 2026

Nathan Ochsner, Clerk of Court

TO: Office of the Clerk
United States Bankruptcy Court
Southern District of TEXAS
Houston Division
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Houston, TX 77208

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