

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

	X	
	:	
In re:	:	Chapter 11
	:	
MODIVCARE INC., <i>et al.</i> ,	:	Case No. 25-90309 (ARP)
	:	
Debtors. ¹	:	(Joint Administration Requested)
	:	
	X	

NOTICE OF DESIGNATION AS COMPLEX BANKRUPTCY CASE

On August 20, 2025, the debtors in possession in the above-captioned cases (collectively, the “**Debtors**”) filed voluntary petitions for relief under title 11 of the United States Code in the United States Bankruptcy Court for the Southern District of Texas (the “**Court**”). The undersigned proposed counsel believes that these chapter 11 cases qualify as complex cases because:

- X The total liabilities of the Debtors exceed \$10 million.
- X There are more than 50 parties-in-interest in these cases.
- X Claims against the Debtors are publicly traded.
- Other

Accordingly, the Debtors respectfully request that the Court enter an order, substantially in the form attached hereto, granting the relief requested herein and such other and further relief as may be just and proper.

¹ A complete list of each of the 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 Debtors’ proposed claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Debtor ModivCare Inc.’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.



Dated: August 20, 2025

Respectfully submitted,

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

HUNTON ANDREWS KURTH LLP

Timothy A. ("Tad") Davidson II (Texas Bar No. 24012503)

Catherine A. Rankin (Texas Bar No. 24109810)

Brandon Bell (Texas Bar No. 24127019)

600 Travis Street, Suite 4200

Houston, TX 77002

Telephone: (713) 220-4200

Email: taddavidson@hunton.com

catherinerankin@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

*Proposed Attorneys for the Debtors
and Debtors in Possession*

CERTIFICATE OF SERVICE

I certify that on August 20, 2025, 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

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ORDER GRANTING COMPLEX CASE TREATMENT
[Docket No. ____]

These jointly administered cases were filed on August 20, 2025. A Notice of Designation as Complex Case was filed. Based on its review of the initial pleadings, the Court concludes that the complex case designation is appropriate. Accordingly, the Court orders:

1. The Procedures for Complex Cases in the Southern District of Texas apply to these cases. The procedures are posted on the Court's website. Compliance with the procedures is required.
2. The Debtors must give notice of this order to all parties in interest within seven days. If a party-in-interest objects to the provisions of this order, that party may file an appropriate motion within 14 days after service of this order.
3. The Bankruptcy Local Rules apply to these cases, subject to the following modifications:
 - a. Bankruptcy Local Rule 1001-1(b) does not apply.
 - b. Local District Court Civil Rule 83.1 applies.
 - c. Appendix A to the Local Rules of the District Court applies.

¹ A complete list of each of the 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 Debtors' proposed claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Debtor ModivCare Inc.'s principal place of business and the Debtors' service address in the Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.

- d. If a conflict exists between the Bankruptcy Local Rules and the Procedures for Complex Cases in the Southern District of Texas, the Procedures for Complex Cases in the Southern District of Texas govern.

Signed: _____, 2025
Houston, Texas

UNITED STATES BANKRUPTCY JUDGE