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

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

## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF ALL PLEADINGS

PLEASE TAKE NOTICE that the undersigned hereby appear as counsel to the First Lien Agent and Consenting Creditors in the above-captioned chapter 11 cases pursuant to Rules 2002, 3017(a), 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules") and requests that copies of any and all notices, pleadings, motions, orders to show cause, applications, presentments, petitions, memoranda, affidavits, declarations, and orders, or other documents, filed or entered in these cases, be transmitted to:

Matthew L. Warren (TX Bar No. 24119154) Lindsey Henrikson (*pro hac vice* pending)

## PAUL HASTINGS LLP

71 South Wacker Drive, Suite 4500 Chicago, Illinois 60606 Telephone: (312) 499-6000 Facsimile: (312) 499-6100 Email: mattwarren@paulhastings.com lindseyhenrikson@paulhastings.com

-and-

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.

Kristopher M. Hansen (pro hac vice pending)

PAUL HASTINGS LLP

200 Park Avenue

New York, New York 10166 Telephone: (212) 318-6000

Facsimile: (212) 319-4090

Email: krishansen@paulhastings.com

PLEASE TAKE FURTHER NOTICE that this request includes not only the notices and

papers referred to in the Bankruptcy Rules and title 11 of the United States Code, but also includes

orders and notices of any application, motion, petition, pleading, request, complaint, or demand,

whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail,

courier service, hand-delivery, telephone, facsimile transmission, electronically, or otherwise filed

with regard to the above cases.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any

prior or later appearance, pleading, claim, or suit shall waive any rights of the First Lien Agent

and Consenting Creditors to (a) have final orders in non-core matters entered only after de novo

review by a District Court judge, (b) trial by jury in any proceeding so triable in these cases or any

case, controversy, or proceeding related to these cases, (c) have the District Court withdraw the

reference in any matter subject to mandatory or discretionary withdrawal, or (d) any other rights,

claims, actions, defenses, setoffs or recoupments, under agreements, in law, in equity, or otherwise,

all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

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Dated: August 20, 2025 Chicago, Illinois Respectfully submitted,

/s/ Matthew L. Warren

### **PAUL HASTINGS LLP**

Matthew L. Warren (TX Bar No. 24119154) Lindsey Henrikson (*pro hac vice* pending) 71 South Wacker Drive, Suite 4500

Chicago, Illinois 60606 Telephone: (312) 499-6000 Facsimile: (312) 499-6100

Email: mattwarren@paulhastings.com lindseyhenrikson@paulhastings.com

-and-

Kristopher M. Hansen (*pro hac vice* pending) 200 Park Avenue New York, New York 10166

Telephone: (212) 318-6000 Facsimile: (212) 319-4090

Email: krishansen@paulhastings.com

Counsel to First Lien Agent and Consenting Creditors

#### **Certificate of Service**

I certify that on August 20, 2025, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Matthew L. Warren
Matthew L. Warren