

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

-----	X	
	:	
In re:	:	Chapter 11
	:	
MODIVCARE INC.,	:	Case No. 25-90309 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (86-0845127)	:	
-----	X	
	:	
In re:	:	Chapter 11
	:	
A & B HOMECARE SOLUTIONS, L.L.C.,	:	Case No. 25-90310 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (06-1565019)	:	
-----	X	
	:	
In re:	:	Chapter 11
	:	
A.E. MEDICAL ALERT, INC.,	:	Case No. 25-90308 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (56-2348300)	:	
-----	X	
	:	
In re:	:	Chapter 11
	:	
ABC HOMECARE LLC,	:	Case No. 25-90311 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (47-5312537)	:	
-----	X	



-----	X	
In re:	:	Chapter 11
ALL METRO AIDS, INC.,	:	Case No. 25-90312 (ARP)
Debtor.	:	
Tax I.D. No. (11-2542379)	:	
-----	X	
In re:	:	Chapter 11
ALL METRO ASSOCIATE PAYROLL SERVICES CORPORATION,	:	Case No. 25-90313 (ARP)
Debtor.	:	
Tax I.D. No. (13-4312222)	:	
-----	X	
In re:	:	Chapter 11
ALL METRO CGA PAYROLL SERVICES CORPORATION,	:	Case No. 25-90314 (ARP)
Debtor.	:	
Tax I.D. No. (47-3753810)	:	
-----	X	
In re:	:	Chapter 11
ALL METRO FIELD SERVICE WORKERS PAYROLL SERVICES CORPORATION,	:	Case No. 25-90315 (ARP)
Debtor.	:	
Tax I.D. No. (13-4312220)	:	
-----	X	

-----	X	
	:	
In re:	:	Chapter 11
	:	
ALL METRO HEALTH CARE SERVICES, INC.,	:	Case No. 25-90316 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (84-1623916)	:	
-----	X	
	:	
In re:	:	
	:	Chapter 11
ALL METRO HOME CARE SERVICES OF	:	
FLORIDA, INC.,	:	Case No. 25-90317 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (43-2015287)	:	
-----	X	
	:	
In re:	:	Chapter 11
	:	
ALL METRO HOME CARE SERVICES OF	:	Case No. 25-90318 (ARP)
NEW JERSEY, INC.,	:	
	:	
Debtor.	:	
	:	
Tax I.D. No. (77-0612030)	:	
-----	X	
	:	
In re:	:	Chapter 11
	:	
ALL METRO HOME CARE SERVICES OF	:	Case No. 25-90319 (ARP)
NEW YORK, INC.,	:	
	:	
Debtor.	:	
	:	
Tax I.D. No. (84-1623899)	:	
-----	X	

-----	X	
In re:	:	Chapter 11
	:	
ALL METRO HOME CARE SERVICES, INC.,	:	Case No. 25-90320 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (84-1623924)	:	
-----	X	
In re:	:	Chapter 11
	:	
ALL METRO MANAGEMENT AND PAYROLL:	:	Case No. 25-90321 (ARP)
SERVICES CORPORATION,	:	
	:	
Debtor.	:	
	:	
Tax I.D. No. (83-0439830)	:	
-----	X	
In re:	:	Chapter 11
	:	
ALL METRO PAYROLL SERVICES	:	Case No. 25-90322 (ARP)
CORPORATION,	:	
	:	
Debtor.	:	
	:	
Tax I.D. No. (11-3353755)	:	
-----	X	
In re:	:	Chapter 11
	:	
AM HOLDCO, INC.,	:	Case No. 25-90323 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (37-1744530)	:	
-----	X	

-----	X	
In re:	:	Chapter 11
AM INTERMEDIATE HOLDCO, INC.,	:	Case No. 25-90324 (ARP)
Debtor.	:	
Tax I.D. No. (47-1765824)	:	
-----	X	
In re:	:	Chapter 11
ARSENS HOME CARE, INC.,	:	Case No. 25-90325 (ARP)
Debtor.	:	
Tax I.D. No. (20-2862290)	:	
-----	X	
In re:	:	Chapter 11
ARU HOSPICE, INC.,	:	Case No. 25-90326 (ARP)
Debtor.	:	
Tax I.D. No. (45-5092171)	:	
-----	X	
In re:	:	Chapter 11
ASSOCIATED HOME SERVICES, INC.,	:	Case No. 25-90327 (ARP)
Debtor.	:	
Tax I.D. No. (74-2722067)	:	
-----	X	
In re:	:	Chapter 11
AT-HOME QUALITY CARE, LLC,	:	Case No. 25-90328 (ARP)
Debtor.	:	
Tax I.D. No. (26-1552093)	:	
-----	X	

-----	X	
In re:	:	Chapter 11
AUDITORY RESPONSE SYSTEMS, INC.,	:	Case No. 25-90329 (ARP)
Debtor.	:	
Tax I.D. No. (02-0442987)	:	
-----	X	
In re:	:	Chapter 11
BARNEY'S MEDICAL ALERT-ERS, INC.,	:	Case No. 25-90330 (ARP)
Debtor.	:	
Tax I.D. No. (27-1724008)	:	
-----	X	
In re:	:	Chapter 11
CALIFORNIA MEDTRANS NETWORK IPA LLC,	:	Case No. 25-90331 (ARP)
Debtor.	:	
Tax I.D. No. (61-1732160)	:	
-----	X	
In re:	:	Chapter 11
CALIFORNIA MEDTRANS NETWORK MSO LLC,	:	Case No. 25-90332 (ARP)
Debtor.	:	
Tax I.D. No. (36-4780748)	:	
-----	X	

-----	X	
In re:	:	Chapter 11
CARE FINDERS TOTAL CARE LLC,	:	Case No. 25-90333 (ARP)
Debtor.	:	
Tax I.D. No. (46-2555599)	:	
-----	X	
In re:	:	Chapter 11
CAREGIVERS ALLIANCE, LLC,	:	Case No. 25-90334 (ARP)
Debtor.	:	
Tax I.D. No. (45-5022161)	:	
-----	X	
In re:	:	Chapter 11
CAREGIVERS AMERICA HOME HEALTH SERVICES, LLC,	:	Case No. 25-90335 (ARP)
Debtor.	:	
Tax I.D. No. (20-8167059)	:	
-----	X	
In re:	:	Chapter 11
CAREGIVERS AMERICA MEDICAL STAFFING, LLC,	:	Case No. 25-90336 (ARP)
Debtor.	:	
Tax I.D. No. (26-3978350)	:	
-----	X	

-----	X	
In re:	:	Chapter 11
CAREGIVERS AMERICA MEDICAL SUPPLY, LLC,	:	Case No. 25-90337 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (58-3787187)	:	
-----	X	
In re:	:	Chapter 11
CAREGIVERS AMERICA REGISTRY, LLC,	:	Case No. 25-90338 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (27-1302162)	:	
-----	X	
In re:	:	Chapter 11
CAREGIVERS AMERICA, LLC,	:	Case No. 25-90339 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (33-0993363)	:	
-----	X	
In re:	:	Chapter 11
CAREGIVERS ON CALL, INC.,	:	Case No. 25-90340 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (16-1737635)	:	
-----	X	

-----	X	
In re:	:	Chapter 11
CGA HOLDCO, INC.,	:	Case No. 25-90341 (ARP)
Debtor.	:	
Tax I.D. No. (47-1880444)	:	
-----	X	
In re:	:	Chapter 11
CGA STAFFING SERVICES, LLC,	:	Case No. 25-90342 (ARP)
Debtor.	:	
Tax I.D. No. (37-1616908)	:	
-----	X	
In re:	:	Chapter 11
CIRCULATION, INC.,	:	Case No. 25-90343 (ARP)
Debtor.	:	
Tax I.D. No. (61-1780747)	:	
-----	X	
In re:	:	Chapter 11
FLORIDA MEDTRANS NETWORK LLC,	:	Case No. 25-90344 (ARP)
Debtor.	:	
Tax I.D. No. (32-0432993)	:	
-----	X	
In re:	:	Chapter 11
FLORIDA MEDTRANS NETWORK MSO LLC,	:	Case No. 25-90345 (ARP)
Debtor.	:	
Tax I.D. No. (36-4778512)	:	
-----	X	

-----	X	
In re:	:	Chapter 11
	:	
GUARDIAN MEDICAL MONITORING, LLC,	:	Case No. 25-90346 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (38-3432082)	:	
-----	X	
In re:	:	Chapter 11
	:	
HEALTH TRANS, INC.,	:	Case No. 25-90347 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (65-0613681)	:	
-----	X	
In re:	:	Chapter 11
	:	
HEALTHCOM, INC.,	:	Case No. 25-90349 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (37-1285320)	:	
-----	X	
In re:	:	Chapter 11
	:	
HEALTHCOM HOLDINGS LLC,	:	Case No. 25-90348 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (82-2311720)	:	
-----	X	

-----	X	
In re:	:	Chapter 11
HELPING HAND HOME HEALTH CARE	:	Case No. 25-90350 (ARP)
AGENCY INC,	:	
Debtor.	:	
Tax I.D. No. (27-4209787)	:	
-----	X	
In re:	:	Chapter 11
HELPING HAND HOSPICE INC.,	:	Case No. 25-90351 (ARP)
Debtor.	:	
Tax I.D. No. (27-1752958)	:	
-----	X	
In re:	:	Chapter 11
HIGI CARE HOLDINGS, LLC,	:	Case No. 25-90352 (ARP)
Debtor.	:	
Tax I.D. No. (N/A)	:	
-----	X	
In re:	:	Chapter 11
HIGI CARE, LLC,	:	Case No. 25-90353 (ARP)
Debtor.	:	
Tax I.D. No. (92-3529673)	:	
-----	X	

-----	X	
In re:	:	Chapter 11
HIGI SH HOLDINGS INC.,	:	Case No. 25-90354 (ARP)
Debtor.	:	
Tax I.D. No. (82-0738014)	:	
-----	X	
In re:	:	Chapter 11
HIGI SH LLC,	:	Case No. 25-90355 (ARP)
Debtor.	:	
Tax I.D. No. (38-3931574)	:	
-----	X	
In re:	:	Chapter 11
INDEPENDENCE HEALTHCARE CORPORATION,	:	Case No. 25-90356 (ARP)
Debtor.	:	
Tax I.D. No. (74-3074366)	:	
-----	X	
In re:	:	Chapter 11
METROPOLITAN MEDICAL TRANSPORTATION IPA, LLC,	:	Case No. 25-90357 (ARP)
Debtor.	:	
Tax I.D. No. (20-8998027)	:	
-----	X	

-----	X	
In re:	:	Chapter 11
MLA SALES, LLC,	:	
	:	Case No. 25-90358 (ARP)
Debtor.	:	
Tax I.D. No. (N/A)	:	
-----	X	
In re:	:	Chapter 11
MODIVCARE SOLUTIONS, LLC,	:	
	:	Case No. 25-90359 (ARP)
Debtor.	:	
Tax I.D. No. (58-2491253)	:	
-----	X	
In re:	:	Chapter 11
MULTICULTURAL HOME CARE INC.,	:	
	:	Case No. 25-90360 (ARP)
Debtor.	:	
Tax I.D. No. (04-3280270)	:	
-----	X	
In re:	:	Chapter 11
NATIONAL MEDTRANS, LLC,	:	
	:	Case No. 25-90361 (ARP)
Debtor.	:	
Tax I.D. No. (47-2336925)	:	
-----	X	

-----	X	
In re:	:	Chapter 11
NEW ENGLAND EMERGENCY RESPONSE	:	Case No. 25-90363 (ARP)
SYSTEMS, INC.,	:	
Debtor.	:	
Tax I.D. No. (02-0432833)	:	
-----	X	
In re:	:	Chapter 11
OEP AM, INC.,	:	Case No. 25-90365 (ARP)
Debtor.	:	
Tax I.D. No. (81-1260939)	:	
-----	X	
In re:	:	Chapter 11
PANHANDLE SUPPORT SERVICES, INC.,	:	Case No. 25-90366 (ARP)
Debtor.	:	
Tax I.D. No. (55-0728651)	:	
-----	X	
In re:	:	Chapter 11
PERSONAL IN-HOME SERVICES, INC.,	:	Case No. 25-90368 (ARP)
Debtor.	:	
Tax I.D. No. (20-5107362)	:	
-----	X	

-----	X	
In re:	:	Chapter 11
PHILADELPHIA HOME CARE AGENCY, INC.,	:	Case No. 25-90371 (ARP)
Debtor.	:	
Tax I.D. No. (20-1524491)	:	
-----	X	
In re:	:	Chapter 11
PROVADO TECHNOLOGIES, LLC,	:	Case No. 25-90362 (ARP)
Debtor.	:	
Tax I.D. No. (22-3895026)	:	
-----	X	
In re:	:	Chapter 11
RED TOP TRANSPORTATION, INC.,	:	Case No. 25-90364 (ARP)
Debtor.	:	
Tax I.D. No. (59-2499262)	:	
-----	X	
In re:	:	Chapter 11
RIDE PLUS, LLC,	:	Case No. 25-90367 (ARP)
Debtor.	:	
Tax I.D. No. (27-2769684)	:	
-----	X	
In re:	:	Chapter 11
SAFE LIVING TECHNOLOGIES, LLC,	:	Case No. 25-90369 (ARP)
Debtor.	:	
Tax I.D. No. (32-0413522)	:	
-----	X	

-----	X	
In re:	:	Chapter 11
	:	
SECURA HOME HEALTH HOLDINGS, INC.,	:	Case No. 25-90370 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (47-2928880)	:	
-----	X	
In re:	:	Chapter 11
	:	
SECURA HOME HEALTH, LLC,	:	Case No. 25-90372 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (47-2908342)	:	
-----	X	
In re:	:	Chapter 11
	:	
SOCRATES HEALTH HOLDINGS, LLC,	:	Case No. 25-90373 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (85-4229682)	:	
-----	X	
In re:	:	Chapter 11
	:	
TRIMED, LLC,	:	Case No. 25-90374 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (47-5088596)	:	
-----	X	
In re:	:	Chapter 11
	:	
UNION HOME CARE LLC,	:	Case No. 25-90375 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (82-3229500)	:	
-----	X	

-----	X	
	:	
In re:	:	Chapter 11
	:	
VALUED RELATIONSHIPS, INC.,	:	Case No. 25-90376 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (31-1274364)	:	
-----	X	
	:	
In re:	:	Chapter 11
	:	
VICTORY HEALTH HOLDINGS, LLC,	:	Case No. 25-90377 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (87-2147451)	:	
-----	X	
	:	
In re:	:	Chapter 11
	:	
VRI INTERMEDIATE HOLDINGS, LLC,	:	Case No. 25-90378 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (46-4570913)	:	
-----	X	

**EMERGENCY MOTION OF DEBTORS FOR AN ORDER
DIRECTING JOINT ADMINISTRATION OF CHAPTER 11 CASES**

Emergency relief has been requested. Relief is requested not later than 2:30 p.m. (prevailing Central Time) on August 21, 2025.

If you object to the relief requested or you believe that emergency consideration is not warranted, you must appear at the hearing if one is set, or file a written response prior to the date that relief is requested in the preceding paragraph. Otherwise, the Court may treat the pleading as unopposed and grant the relief requested.

A hearing will be conducted on this matter on August 21, 2025 at 2:30 p.m. (prevailing Central Time) in Courtroom 400, 4th floor, 515 Rusk Street, Houston, Texas 77002. Participation at the hearing will only be permitted by an audio and video connection.

Audio communication will be by use of the Court’s dial-in facility. You may access the facility at 832-917-1510. Once connected, you will be asked to enter the conference room number. Judge Pérez’s conference room number is 282694. Video communication will be by use of the GoToMeeting platform. Connect via the free GoToMeeting application or click the link on Judge Pérez’s home page. The meeting code is “Judge

Pérez”. Click the settings icon in the upper right corner and enter your name under the personal information setting.

Hearing appearances must be made electronically in advance of both electronic and in-person hearings. To make your appearance, click the “Electronic Appearance” link on Judge Pérez’s home page. Select the case name, complete the required fields and click “Submit” to complete your appearance.

ModivCare Inc. and its debtor affiliates in the above-captioned cases, as debtors and debtors in possession (collectively, the “**Debtors**”), respectfully state as follows in support of this motion (this “**Motion**”):

RELIEF REQUESTED

1. By this Motion, the Debtors seek entry of an order, substantially in the form attached hereto (the “**Proposed Order**”), directing joint administration of the Chapter 11 Cases (defined below) for procedural purposes only and granting related relief. The Debtors request that one file and one docket be maintained for all of the jointly administered cases under the case of ModivCare Inc., *et al.*, Case No. 25-90309 (ARP) and that the cases be administered under a consolidated caption, as follows:

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	:	(Jointly Administered)
	:	
	X	

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.

2. The Debtors also seek the Court’s direction that a notation substantially similar to the following notation be entered on the docket in each of the Chapter 11 Cases (other than the case of ModivCare Inc.) to reflect the joint administration of these cases:

An order has been entered in this case directing the procedural consolidation and joint administration of the chapter 11 cases of ModivCare Inc., *et al.* The docket in Case No. 25-90309 (ARP) should be consulted for all matters affecting this case.

JURISDICTION AND VENUE

3. 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 pursuant to 28 U.S.C. § 157(b) and this Court may enter a final order consistent with Article III of the United States Constitution.

4. Venue of these cases and this Motion in this district is proper under 28 U.S.C. §§ 1408 and 1409.

5. The statutory and legal predicates for the relief requested herein are sections 105(a) and 342(c) of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the “***Bankruptcy Code***”), rule 1015(b) of the Federal Rules of Bankruptcy Procedure (the “***Bankruptcy Rules***”), rule 1015-1 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 (the “***Complex Case Procedures***”).

BACKGROUND

6. On the August 20, 2025 (the “***Petition Date***”), the Debtors each filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code. The Debtors continue to operate their businesses and manage their properties as debtors in possession under sections 1107(a) and 1108

of the Bankruptcy Code. No trustee, examiner, or statutory committee has been appointed in the Chapter 11 Cases.

7. 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 in the *Declaration of Chad J. Shandler in Support of Chapter 11 Petitions and First Day Relief* (the “**First Day Declaration**”), and incorporated herein by reference.¹

8. ModivCare is a technology-based healthcare services company that helps people (especially those in vulnerable situations) get the care and support they need. The Company works with government and private health insurance plans, as well as individuals, to provide: (a) transportation to and from medical appointments (non-emergency medical transportation totaling over 36 million rides per year); (b) in-home personal care (*e.g.*, helping with daily activities); (c) remote monitoring of patients’ health from home; and (d) community health kiosks and wellness programs. ModivCare employs approximately 23,675 people and operates across 48 states and the District of Columbia, including Texas, with corporate offices in Denver, Colorado. ModivCare’s goal is to make it easier for patients to get care, remove barriers that keep people from staying healthy, and improve overall health outcomes.

9. As described in the First Day Declaration, the Debtors are party to that certain Restructuring Support Agreement (the “**RSA**”) with certain creditors who collectively hold approximately 90% of the First Lien Claims and approximately 70% of the Second Lien Claims. Pursuant to the RSA, the consenting creditors have agreed to provide \$100 million in debtor-in-possession financing to fund the Chapter 11 Cases and support the comprehensive restructuring

¹ Capitalized terms used but not otherwise defined herein have the meaning ascribed to them in the First Day Declaration.

transactions set forth in the term sheet attached to the RSA (the “*RSA Term Sheet*”). The RSA Term Sheet contemplates, among other things: (a) the equitization of approximately \$871 million in First Lien Claims and approximately \$316 million in Second Lien Claims; (b) the commitment of the consenting creditors to provide exit financing through the Exit Term Loan Facility; (c) the reorganized Debtors’ entry into an exit revolving credit facility to support ongoing operations; and (d) the discharge of the Unsecured Notes Claims and General Unsecured Claims; with holders of such claims entitled to participate in an equity rights offering of up to \$200 million, subject to the terms of the RSA. In total, the transactions contemplated by the RSA Term Sheet are expected to reduce the Debtors’ funded debt obligations by approximately \$1.1 billion.

BASIS FOR RELIEF

10. Bankruptcy Rule 1015(b) provides, in relevant part, that “[i]f ... two or more petitions are pending in the same court by or against ... a debtor and an affiliate, the court may order a joint administration of the estates.” Fed. R. Bankr. P. 1015(b).

11. The Debtors are “affiliates” of each other as that term is defined in section 101(2) of the Bankruptcy Code. Specifically, section 101(2)(A) of the Bankruptcy Code provides that an “affiliate” is an “entity that directly or indirectly owns, controls, or holds with power to vote, 20 percent or more of the outstanding voting securities of the debtor” 11 U.S.C. § 101(2)(A). Here, the Debtors are affiliates of one another because, as reflected in the organizational chart attached as Exhibit B to the First Day Declaration, Debtor ModivCare Inc. owns, either directly or indirectly, 20% or more of the outstanding ownership interests in each of the Debtors. Accordingly, the Debtors are “affiliates” under section 101(2) of the Bankruptcy Code and Bankruptcy Rule 1015(b) and joint administration of the Chapter 11 Cases is appropriate.

12. Bankruptcy Local Rule 1015-1 provides additional authority for the Court to order joint administration of the Chapter 11 Cases. *See* BLR 1015-1 (stating the procedure for filing

motions and proposed orders for joint administration). The Debtors have filed this Motion in compliance with the Bankruptcy Local Rules. Accordingly, the Court is authorized to jointly administer the Chapter 11 Cases for procedural purposes.

13. Joint administration of the Chapter 11 Cases will save the Debtors and their estates substantial time and expense because it will remove the need to prepare, replicate, file, and serve duplicative notices, applications, and orders. Joint administration will also relieve the Court of entering duplicative orders and maintaining duplicative files and dockets. The United States Trustee for the Southern District of Texas and other parties-in-interest will similarly benefit from joint administration of the Chapter 11 Cases, sparing them the time and effort of reviewing duplicative dockets, pleadings, and papers. Further, joint administration will protect parties in interest by ensuring that they will be apprised of the various motions filed with the Court with respect to each of the Debtors' cases.

14. Moreover, joint administration will not adversely affect the Debtors' respective constituencies because this Motion seeks only administrative combination, and not substantive consolidation, of the Debtors' estates. As such, each creditor will continue to hold its claim against a particular Debtor's estate after this Motion is approved, and each creditor and party in interest will maintain whatever rights it has against the particular estate in which it allegedly has a claim or right. In addition, all creditors will benefit from the reduction in costs that will result from joint administration. Thus, the Debtors submit that joint administration of the Chapter 11 Cases is in the best interests of their estates, their creditors, and all parties in interest.

15. Based on the foregoing, the Debtors submit that the relief requested is necessary and appropriate, is in the best interests of their estates and creditors, and should be granted in all respects.

EMERGENCY CONSIDERATION

16. The Debtors respectfully request emergency consideration of this Motion pursuant to Bankruptcy Local Rule 9013-1 and Bankruptcy Rule 6003, which authorize the Court to grant relief within the first 21 days after the commencement of a chapter 11 case to the extent that relief is necessary to avoid immediate and irreparable harm. As described in detail above and in the First Day Declaration, immediate and irreparable harm would result if the relief requested herein is not granted. Accordingly, the Debtors submit that the requirements of Bankruptcy Rule 6003 are satisfied.

NOTICE

17. Notice of this Motion will be served on: (a) the Office of the United States Trustee for the Southern District of Texas; (b) Paul Hastings LLP, as counsel to the First Lien Agent and the Consenting Creditors; (c) counsel to the DIP Lenders; (d) the creditors listed on the Debtors' consolidated list of 30 creditors holding the largest unsecured claims; (e) the United States Attorney for the Southern District of Texas; (f) the Internal Revenue Service; (g) the Securities and Exchange Commission; (h) the state attorneys general for states in which the Debtors conduct business; and (i) any party that has requested notice pursuant to Bankruptcy Rule 2002. The Debtors submit that, under the circumstances, no other or further notice is required.

18. 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 Debtors' proposed claims and noticing agent, Kurtzman Carson Consultants, LLC d/b/a Verita Global, at <https://www.veritaglobal.net/ModivCare>.

WHEREFORE, the Debtors respectfully request that the Court enter the Proposed Order granting the relief requested in the Motion and such other and further relief as may be just and proper.

Dated: August 21, 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 21, 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

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

-----	X	
	:	
In re:	:	Chapter 11
	:	
MODIVCARE INC.,	:	Case No. 25-90309 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (86-0845127)	:	
-----	X	
	:	
In re:	:	Chapter 11
	:	
A & B HOMECARE SOLUTIONS, L.L.C.,	:	Case No. 25-90310 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (06-1565019)	:	
-----	X	
	:	
In re:	:	Chapter 11
	:	
A.E. MEDICAL ALERT, INC.,	:	Case No. 25-90308 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (56-2348300)	:	
-----	X	
	:	
In re:	:	Chapter 11
	:	
ABC HOMECARE LLC,	:	Case No. 25-90311 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (47-5312537)	:	
-----	X	

-----	X	
In re:	:	Chapter 11
ALL METRO AIDS, INC.,	:	Case No. 25-90312 (ARP)
Debtor.	:	
Tax I.D. No. (11-2542379)	:	
-----	X	
In re:	:	Chapter 11
ALL METRO ASSOCIATE PAYROLL SERVICES CORPORATION,	:	Case No. 25-90313 (ARP)
Debtor.	:	
Tax I.D. No. (13-4312222)	:	
-----	X	
In re:	:	Chapter 11
ALL METRO CGA PAYROLL SERVICES CORPORATION,	:	Case No. 25-90314 (ARP)
Debtor.	:	
Tax I.D. No. (47-3753810)	:	
-----	X	
In re:	:	Chapter 11
ALL METRO FIELD SERVICE WORKERS PAYROLL SERVICES CORPORATION,	:	Case No. 25-90315 (ARP)
Debtor.	:	
Tax I.D. No. (13-4312220)	:	
-----	X	

-----	X	
	:	
In re:	:	Chapter 11
	:	
ALL METRO HEALTH CARE SERVICES, INC.,	:	Case No. 25-90316 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (84-1623916)	:	
-----	X	
	:	
In re:	:	
	:	Chapter 11
ALL METRO HOME CARE SERVICES OF	:	
FLORIDA, INC.,	:	Case No. 25-90317 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (43-2015287)	:	
-----	X	
	:	
In re:	:	Chapter 11
	:	
ALL METRO HOME CARE SERVICES OF	:	Case No. 25-90318 (ARP)
NEW JERSEY, INC.,	:	
	:	
Debtor.	:	
	:	
Tax I.D. No. (77-0612030)	:	
-----	X	
	:	
In re:	:	Chapter 11
	:	
ALL METRO HOME CARE SERVICES OF	:	Case No. 25-90319 (ARP)
NEW YORK, INC.,	:	
	:	
Debtor.	:	
	:	
Tax I.D. No. (84-1623899)	:	
-----	X	

-----	X	
In re:	:	Chapter 11
	:	
ALL METRO HOME CARE SERVICES, INC.,	:	Case No. 25-90320 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (84-1623924)	:	
-----	X	
In re:	:	Chapter 11
	:	
ALL METRO MANAGEMENT AND PAYROLL:	:	Case No. 25-90321 (ARP)
SERVICES CORPORATION,	:	
	:	
Debtor.	:	
	:	
Tax I.D. No. (83-0439830)	:	
-----	X	
In re:	:	Chapter 11
	:	
ALL METRO PAYROLL SERVICES	:	Case No. 25-90322 (ARP)
CORPORATION,	:	
	:	
Debtor.	:	
	:	
Tax I.D. No. (11-3353755)	:	
-----	X	
In re:	:	Chapter 11
	:	
AM HOLDCO, INC.,	:	Case No. 25-90323 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (37-1744530)	:	
-----	X	

-----	X	
In re:	:	Chapter 11
AM INTERMEDIATE HOLDCO, INC.,	:	Case No. 25-90324 (ARP)
Debtor.	:	
Tax I.D. No. (47-1765824)	:	
-----	X	
In re:	:	Chapter 11
ARSENS HOME CARE, INC.,	:	Case No. 25-90325 (ARP)
Debtor.	:	
Tax I.D. No. (20-2862290)	:	
-----	X	
In re:	:	Chapter 11
ARU HOSPICE, INC.,	:	Case No. 25-90326 (ARP)
Debtor.	:	
Tax I.D. No. (45-5092171)	:	
-----	X	
In re:	:	Chapter 11
ASSOCIATED HOME SERVICES, INC.,	:	Case No. 25-90327 (ARP)
Debtor.	:	
Tax I.D. No. (74-2722067)	:	
-----	X	
In re:	:	Chapter 11
AT-HOME QUALITY CARE, LLC,	:	Case No. 25-90328 (ARP)
Debtor.	:	
Tax I.D. No. (26-1552093)	:	
-----	X	

-----	X	
In re:	:	Chapter 11
AUDITORY RESPONSE SYSTEMS, INC.,	:	Case No. 25-90329 (ARP)
Debtor.	:	
Tax I.D. No. (02-0442987)	:	
-----	X	
In re:	:	Chapter 11
BARNEY'S MEDICAL ALERT-ERS, INC.,	:	Case No. 25-90330 (ARP)
Debtor.	:	
Tax I.D. No. (27-1724008)	:	
-----	X	
In re:	:	Chapter 11
CALIFORNIA MEDTRANS NETWORK IPA LLC,	:	Case No. 25-90331 (ARP)
Debtor.	:	
Tax I.D. No. (61-1732160)	:	
-----	X	
In re:	:	Chapter 11
CALIFORNIA MEDTRANS NETWORK MSO LLC,	:	Case No. 25-90332 (ARP)
Debtor.	:	
Tax I.D. No. (36-4780748)	:	
-----	X	

-----	X	
In re:	:	Chapter 11
CARE FINDERS TOTAL CARE LLC,	:	Case No. 25-90333 (ARP)
Debtor.	:	
Tax I.D. No. (46-2555599)	:	
-----	X	
In re:	:	Chapter 11
CAREGIVERS ALLIANCE, LLC,	:	Case No. 25-90334 (ARP)
Debtor.	:	
Tax I.D. No. (45-5022161)	:	
-----	X	
In re:	:	Chapter 11
CAREGIVERS AMERICA HOME HEALTH SERVICES, LLC,	:	Case No. 25-90335 (ARP)
Debtor.	:	
Tax I.D. No. (20-8167059)	:	
-----	X	
In re:	:	Chapter 11
CAREGIVERS AMERICA MEDICAL STAFFING, LLC,	:	Case No. 25-90336 (ARP)
Debtor.	:	
Tax I.D. No. (26-3978350)	:	
-----	X	

-----	X	
In re:	:	Chapter 11
CAREGIVERS AMERICA MEDICAL SUPPLY, LLC,	:	Case No. 25-90337 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (58-3787187)	:	
-----	X	
In re:	:	Chapter 11
CAREGIVERS AMERICA REGISTRY, LLC,	:	Case No. 25-90338 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (27-1302162)	:	
-----	X	
In re:	:	Chapter 11
CAREGIVERS AMERICA, LLC,	:	Case No. 25-90339 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (33-0993363)	:	
-----	X	
In re:	:	Chapter 11
CAREGIVERS ON CALL, INC.,	:	Case No. 25-90340 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (16-1737635)	:	
-----	X	

-----	X	
In re:	:	Chapter 11
CGA HOLDCO, INC.,	:	Case No. 25-90341 (ARP)
Debtor.	:	
Tax I.D. No. (47-1880444)	:	
-----	X	
In re:	:	Chapter 11
CGA STAFFING SERVICES, LLC,	:	Case No. 25-90342 (ARP)
Debtor.	:	
Tax I.D. No. (37-1616908)	:	
-----	X	
In re:	:	Chapter 11
CIRCULATION, INC.,	:	Case No. 25-90343 (ARP)
Debtor.	:	
Tax I.D. No. (61-1780747)	:	
-----	X	
In re:	:	Chapter 11
FLORIDA MEDTRANS NETWORK LLC,	:	Case No. 25-90344 (ARP)
Debtor.	:	
Tax I.D. No. (32-0432993)	:	
-----	X	
In re:	:	Chapter 11
FLORIDA MEDTRANS NETWORK MSO LLC,	:	Case No. 25-90345 (ARP)
Debtor.	:	
Tax I.D. No. (36-4778512)	:	
-----	X	

-----	X	
In re:	:	Chapter 11
	:	
GUARDIAN MEDICAL MONITORING, LLC,	:	Case No. 25-90346 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (38-3432082)	:	
-----	X	
In re:	:	Chapter 11
	:	
HEALTH TRANS, INC.,	:	Case No. 25-90347 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (65-0613681)	:	
-----	X	
In re:	:	Chapter 11
	:	
HEALTHCOM, INC.,	:	Case No. 25-90349 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (37-1285320)	:	
-----	X	
In re:	:	Chapter 11
	:	
HEALTHCOM HOLDINGS LLC,	:	Case No. 25-90348 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (82-2311720)	:	
-----	X	

-----	X	
In re:	:	Chapter 11
HELPING HAND HOME HEALTH CARE	:	
AGENCY INC,	:	Case No. 25-90350 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (27-4209787)	:	
-----	X	
In re:	:	Chapter 11
HELPING HAND HOSPICE INC.,	:	
	:	Case No. 25-90351 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (27-1752958)	:	
-----	X	
In re:	:	Chapter 11
HIGI CARE HOLDINGS, LLC,	:	
	:	Case No. 25-90352 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (N/A)	:	
-----	X	
In re:	:	Chapter 11
HIGI CARE, LLC,	:	
	:	Case No. 25-90353 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (92-3529673)	:	
-----	X	

-----	X	
In re:	:	Chapter 11
HIGI SH HOLDINGS INC.,	:	Case No. 25-90354 (ARP)
Debtor.	:	
Tax I.D. No. (82-0738014)	:	
-----	X	
In re:	:	Chapter 11
HIGI SH LLC,	:	Case No. 25-90355 (ARP)
Debtor.	:	
Tax I.D. No. (38-3931574)	:	
-----	X	
In re:	:	Chapter 11
INDEPENDENCE HEALTHCARE CORPORATION,	:	Case No. 25-90356 (ARP)
Debtor.	:	
Tax I.D. No. (74-3074366)	:	
-----	X	
In re:	:	Chapter 11
METROPOLITAN MEDICAL TRANSPORTATION IPA, LLC,	:	Case No. 25-90357 (ARP)
Debtor.	:	
Tax I.D. No. (20-8998027)	:	
-----	X	

-----	X	
	:	
In re:	:	Chapter 11
	:	
MLA SALES, LLC,	:	Case No. 25-90358 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (N/A)	:	
-----	X	
	:	
In re:	:	Chapter 11
	:	
MODIVCARE SOLUTIONS, LLC,	:	Case No. 25-90359 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (58-2491253)	:	
-----	X	
	:	
In re:	:	Chapter 11
	:	
MULTICULTURAL HOME CARE INC.,	:	Case No. 25-90360 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (04-3280270)	:	
-----	X	
	:	
In re:	:	Chapter 11
	:	
NATIONAL MEDTRANS, LLC,	:	Case No. 25-90361 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (47-2336925)	:	
-----	X	

-----	X	
In re:	:	Chapter 11
NEW ENGLAND EMERGENCY RESPONSE	:	Case No. 25-90363 (ARP)
SYSTEMS, INC.,	:	
Debtor.	:	
Tax I.D. No. (02-0432833)	:	
-----	X	
In re:	:	Chapter 11
OEP AM, INC.,	:	Case No. 25-90365 (ARP)
Debtor.	:	
Tax I.D. No. (81-1260939)	:	
-----	X	
In re:	:	Chapter 11
PANHANDLE SUPPORT SERVICES, INC.,	:	Case No. 25-90366 (ARP)
Debtor.	:	
Tax I.D. No. (55-0728651)	:	
-----	X	
In re:	:	Chapter 11
PERSONAL IN-HOME SERVICES, INC.,	:	Case No. 25-90368 (ARP)
Debtor.	:	
Tax I.D. No. (20-5107362)	:	
-----	X	

-----	X	
In re:	:	Chapter 11
PHILADELPHIA HOME CARE AGENCY, INC.,	:	Case No. 25-90371 (ARP)
Debtor.	:	
Tax I.D. No. (20-1524491)	:	
-----	X	
In re:	:	Chapter 11
PROVADO TECHNOLOGIES, LLC,	:	Case No. 25-90362 (ARP)
Debtor.	:	
Tax I.D. No. (22-3895026)	:	
-----	X	
In re:	:	Chapter 11
RED TOP TRANSPORTATION, INC.,	:	Case No. 25-90364 (ARP)
Debtor.	:	
Tax I.D. No. (59-2499262)	:	
-----	X	
In re:	:	Chapter 11
RIDE PLUS, LLC,	:	Case No. 25-90367 (ARP)
Debtor.	:	
Tax I.D. No. (27-2769684)	:	
-----	X	
In re:	:	Chapter 11
SAFE LIVING TECHNOLOGIES, LLC,	:	Case No. 25-90369 (ARP)
Debtor.	:	
Tax I.D. No. (32-0413522)	:	
-----	X	

-----	X	
In re:	:	Chapter 11
SECURA HOME HEALTH HOLDINGS, INC.,	:	Case No. 25-90370 (ARP)
Debtor.	:	
Tax I.D. No. (47-2928880)	:	
-----	X	
In re:	:	Chapter 11
SECURA HOME HEALTH, LLC,	:	Case No. 25-90372 (ARP)
Debtor.	:	
Tax I.D. No. (47-2908342)	:	
-----	X	
In re:	:	Chapter 11
SOCRATES HEALTH HOLDINGS, LLC,	:	Case No. 25-90373 (ARP)
Debtor.	:	
Tax I.D. No. (85-4229682)	:	
-----	X	
In re:	:	Chapter 11
TRIMED, LLC,	:	Case No. 25-90374 (ARP)
Debtor.	:	
Tax I.D. No. (47-5088596)	:	
-----	X	
In re:	:	Chapter 11
UNION HOME CARE LLC,	:	Case No. 25-90375 (ARP)
Debtor.	:	
Tax I.D. No. (82-3229500)	:	
-----	X	

-----	X	
	:	
In re:	:	Chapter 11
	:	
VALUED RELATIONSHIPS, INC.,	:	Case No. 25-90376 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (31-1274364)	:	
-----	X	
	:	
In re:	:	Chapter 11
	:	
VICTORY HEALTH HOLDINGS, LLC,	:	Case No. 25-90377 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (87-2147451)	:	
-----	X	
	:	
In re:	:	Chapter 11
	:	
VRI INTERMEDIATE HOLDINGS, LLC,	:	Case No. 25-90378 (ARP)
	:	
Debtor.	:	
	:	
Tax I.D. No. (46-4570913)	:	
-----	X	

**ORDER DIRECTING JOINT
ADMINISTRATION OF CHAPTER 11 CASES**

Upon the emergency motion (the “*Motion*”)¹ of the Debtors for entry of an order (this “*Order*”) directing the joint administration of the Chapter 11 Cases pursuant to Bankruptcy Rule 1015(b) and Bankruptcy Local Rule 1015-1, all as more fully set forth in the Motion; and the Court having reviewed the Motion and the First Day Declaration; and the Court having jurisdiction to consider the Motion and the relief requested therein in accordance with 28 U.S.C. § 1334; and

¹ Capitalized terms used but not otherwise defined herein have the meaning assigned given to them in the Motion.

the Court having found that this is a core proceeding pursuant to 28 U.S.C. § 157(b)(2) and that the Court may enter a final order consistent with Article III of the United States Constitution; and the Court having found 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 proper and adequate notice of the Motion has been given and that no other or further notice is necessary, except as set forth in the Motion with respect to entry of this Order; and upon the record herein; and after due deliberation thereon; and all objections, if any, to the Motion having been withdrawn, resolved, or overruled; and the Court having determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted herein; and the Court having determined that the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors, and other parties in interest, it is hereby

ORDERED, ADJUDGED, AND DECREED THAT:

1. The above-captioned Chapter 11 Cases are consolidated for procedural purposes only and shall be jointly administered by the Court under Case No. 25-90309 (ARP). All of the jointly administered cases are assigned to Judge Pérez.

2. Nothing contained in this Order shall be deemed or construed as directing or otherwise effecting the substantive consolidation of any of the above-captioned Chapter 11 Cases, the Debtors, or the Debtors' estates.

3. Additionally, the following checked items are ordered:

☒ One disclosure statement and plan of reorganization may be filed for all cases by any plan proponent.

☒ Parties may request joint hearings on matters pending in any of the jointly administered cases.

☒ Other: See below.

4. The caption of the jointly administered cases satisfies the requirements set forth in section 342(c)(1) of the Bankruptcy Code, and shall read as follows:

**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	:	(Jointly Administered)
	:	
	X	

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.

5. All pleadings and notices shall be captioned as indicated in the preceding decretal paragraph, and all original docket entries shall be made in the case of ModivCare Inc., Case No. 25-90309 (ARP).

6. The following docket entry shall be made in each of the above-captioned Chapter 11 Cases (except the case of ModivCare Inc.) substantially as follows:

An order has been entered in this case directing the procedural consolidation and joint administration of the chapter 11 cases of ModivCare Inc., *et al.* The docket in Case No. 25-90309 (ARP) should be consulted for all matters affecting this case.

7. The Debtors shall maintain, and the Clerk of this Court shall keep, one consolidated docket, one file, and one consolidated service list for the above-captioned Chapter 11 Cases.

8. Notwithstanding Bankruptcy Rule 6004(h), to the extent applicable, this Order shall be effective and enforceable immediately upon entry hereof.

9. The Debtors are authorized and empowered to take all actions necessary or appropriate to implement the relief granted in this Order.

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

Signed: _____, 2025
Houston, Texas

UNITED STATES BANKRUPTCY JUDGE