

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

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

**AGENDA OF DEBTORS FOR MATTERS
SET FOR HEARING ON AUGUST 21, 2025**

The debtors in possession in the above-captioned cases (collectively, the “***Debtors***”) file this Agenda of matters set for hearing on **August 21, 2025, at 2:30 p.m. (prevailing Central Time)**.

A. First Day Motions

1. ***DIP Financing/Cash Collateral Motion.*** Emergency Motion of the Debtors for Entry of Interim and Final Orders (A) Authorizing the Debtors to Obtain Postpetition Financing, (B) Granting Liens and Providing Claims with Superpriority Administrative Expense Status, (C) Authorizing the Use of Cash Collateral, (D) Modifying the Automatic Stay, (E) Scheduling a Final Hearing, and (F) Granting Related Relief [Docket No. 4]

Status: This matter is going forward.

2. ***Complex Case Designation.*** Notice of Designation as Complex Bankruptcy Case [Docket No. 2]

Status: This matter is going forward.

3. ***Claims, Noticing, and Solicitation Agent Retention Application.*** Debtors’ Emergency *Ex Parte* Application for Entry of an Order Authorizing the Employment and Retention

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://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.



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of Kurtzman Carson Consultants, LLC dba Verita Global as Claims, Noticing, and Solicitation Agent [Docket No. 3]

Status: This matter is going forward.

4. ***Creditor Matrix Motion.*** Emergency Motion of Debtors for an Order (A) Authorizing the Debtors to (I) File a Consolidated Creditor Matrix and List of the 30 Largest Unsecured Creditors, and (II) to Redact Certain Personally Identifiable Information; (B) Waiving the Requirement to File a List of Equity Security Holders; (C) Authorizing Service of Parties in Interest by Electronic Mail; (D) Approving the Form and Manner of Notifying Creditors of the Commencement of the Chapter 11 Cases; and (E) Granting Related Relief [Docket No. 20]

Status: This matter is going forward.

5. ***Schedules Extension Motion.*** Emergency Motion of Debtors for Entry of an Order (A) Extending the Time to File Schedules and Statements and 2015.3 Reports; (B) Modifying the Requirements of Bankruptcy Local Rule 2015-3; and (C) Granting Related Relief [Docket No. 18]

Status: This matter is going forward.

6. ***Bar Date Motion.*** Emergency Motion of Debtors for Entry of an Order (A) Establishing Bar Dates and Related Procedures for Filing Proofs of Claim, (B) Approving the Form and Manner of Notice Thereof, and (C) Granting Related Relief [Docket No. 19]

Status: This matter is going forward.

7. ***NOL Motion.*** Emergency Motion of Debtors for Entry of an Order (A) Establishing Notification Procedures and Approving Restrictions on (I) Certain Transfers of Interests in the Debtors, and (II) Claims of Certain Worthless Stock Deductions; and (B) Granting Related Relief [Docket No. 5]

Status: This matter is going forward.

8. ***Utilities Motion.*** Emergency Motion of Debtors for Entry of an Order (A) Approving Debtors' Proposed Form of Adequate Assurance of Payment to Utility Providers; (B) Establishing Procedures for Resolving Objections by Utility Providers; (C) Prohibiting Utility Providers from Altering, Refusing, or Discontinuing Service; and (D) Granting Related Relief [Docket No. 8]

Status: This matter is going forward.

9. ***Insurance Motion.*** Emergency Motion of Debtors for Entry of an Order (A) Authorizing Debtors to (I) Continue Insurance Programs, and (II) Pay All Obligations with Respect Thereto; (B) Modifying Automatic Stay to Permit Employees to Proceed with Workers' Compensation Claims; (C) Modifying Automatic Stay to

Permit Insurers to Advance and/or Reimburse Defense Costs and Fees Under Policies; and (D) Granting Related Relief [Docket No. 7]

Status: This matter is going forward.

10. ***Taxes Motion.*** Emergency Motion of Debtors for Entry of an Order (A) Authorizing Debtors to Pay Certain Prepetition Taxes and Fees, and (B) Granting Related Relief [Docket No. 15]

Status: This matter is going forward.

11. ***Cash Management Motion.*** Emergency Motion of Debtors for Entry of Interim and Final Orders (A) Authorizing Debtors to (I) Continue Existing Cash Management System, (II) Maintain Existing Business Forms and Intercompany Arrangements, and (III) Continue Intercompany Transactions; and (B) Granting Related Relief [Docket No. 16]

Status: This matter is going forward.

12. ***Customer Programs Motion.*** Emergency Motion of Debtors for Entry of an Order (A) Authorizing Debtors to (I) Honor Their Prepetition Obligations to Customers and (II) Continue Their Customer Programs; and (B) Granting Related Relief [Docket No. 17]

13. ***Critical Vendors Motion.*** Emergency Motion of Debtors for Entry of Interim and Final Orders (A) Authorizing Payment of Prepetition Trade Claims in the Ordinary Course of Business, and (B) Granting Related Relief [Docket No. 6]

Status: This matter is going forward.

14. ***Wages Motion.*** Emergency Motion of Debtors for Entry of an Order (A) Authorizing Debtors to (I) Pay Prepetition Wages, Salaries, Employee Benefits, and Other Compensation, and (II) Maintain Employee Benefits Programs and Pay Related Obligations; and (B) Granting Related Relief [Docket No. 9]

Status: This matter is going forward.

B. Related Documents

1. ***First Day Declaration.*** Declaration of Chad J. Shandler in Support of Chapter 11 Petitions and First Day Relief [Docket No. 14]
2. ***DIP Financing Declaration.*** Declaration of Zul Jamal in Support of the Debtors' Motion to Obtain Postpetition Debtor-in-Possession Financing [Docket No. 12]
3. ***Debtors' Witness and Exhibit List*** [Docket No. 22]
4. ***Notice of Emergency Virtual Hearing on First Day Motions*** [Docket No. 23]

Dated: August 21, 2025

Respectfully submitted,

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

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*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
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