

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

In re:

MODIVCARE INC., *et al.*,

Debtors.

Chapter 11

Case No. 25-90309 (ARP)

**(Jointly Administered)**

**NOTICE OF APPEARANCE  
AND REQUEST FOR NOTICES AND SERVICE OF PAPERS**

PLEASE TAKE NOTICE that an appearance is hereby entered and request is hereby made on behalf of Federal Insurance Company and Westchester Fire Insurance Company, and their affiliated sureties in accordance with 11 U.S.C. § 1109(b) and Fed. R. Bankr. P. 2002 and 9010(b) (the “Rules”), that all papers, pleadings, motions, and applications served or required to be served in the above-captioned case, be given to and served upon:

Gary D. Bressler, Esq.  
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PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in the Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, requests or demand, any plan or disclosure statement, and any answering or reply papers filed in the above-captioned cases or in any associated case or adversary proceeding.



PLEASE TAKE FURTHER NOTICE that Federal Insurance Company and Westchester Fire Insurance Company, and their affiliated sureties do not intend this Notice of Appearance, nor any subsequent appearance, pleading, claim or suit, to waive any rights to which they may be entitled including, but not limited to: (i) their rights to have final orders in non-core matters entered only after *de novo* review by a District Judge; (ii) their rights to trial by jury in any proceeding related to these cases, or any right to arbitration; (iii) their rights to move for abstention; (iv) their rights to have the district court withdraw the reference in any matter subsequent to mandatory or discretionary withdrawal; or (iv) any rights, claims actions, defenses, setoffs, or recoupments to which they may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments it expressly reserves.

PLEASE TAKE FURTHER NOTICE that this Notice of Appearance does not constitute an agreement to accept services of initial process under Rule 4, Fed. R. Civ. P., or Rule 7004, Fed. R. Bankr. P., nor shall it result in undersigned counsel being deemed to be the agent of Federal Insurance Company and Westchester Fire Insurance Company, and their affiliated sureties for such purposes.

**McELROY, DEUTSCH, MULVANEY &  
CARPENTER, LLP**

Dated August 22, 2025

/s/ Gary D. Bressler  
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