

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

In re:

MODIVCARE INC., *et al.*,

Debtors.¹

)
) Chapter 11
)
) Case No. 25-90309 (ARP)
)
) (Jointly Administered)
)
)

**THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS’
WITNESS AND EXHIBIT LIST FOR HEARING SCHEDULED
FOR SEPTEMBER 30, 2025, AT 3:00 P.M. (PREVAILING CENTRAL TIME)**

The Official Committee of Unsecured Creditors in the above-captioned chapter 11 cases (the “**Committee**”) hereby files its Witness and Exhibit List for the hearing to be held on September 30, 2025 at 3:00 p.m. (prevailing Central Time) (the “**Hearing**”):

WITNESSES

The Committee may call any of the following witnesses at the Hearing:

1. David MacGreevey.

The Committee reserves the right to supplement or amend this witness list and to identify additional witnesses, including rebuttal and impeachment witnesses, prior to the conclusion of the Hearing. The Committee also reserves the right to call any witness or submit any declaration necessary to establish the authenticity or admissibility of documents; call any witness identified by any other party; cross examine any witness called by another party; and call rebuttal witnesses as necessary.

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.



EXHIBITS

The Committee may introduce the following exhibits:

EXHIBIT NO.	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE
1.	<i>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 Expenses Status, (C) Authorizing the Use of Cash Collateral, (D) Modifying the Automatic Stay, (E) Scheduling a Final Hearing, and (F) Granting Related Relief [Dkt No. 4]</i>				
2.	<i>Declaration of Zul Jamal in Support of the Debtors' Motion to Obtain Postpetition Debtor-in-Possession Financing [Dkt No. 12]</i>				
3.	<i>Declaration of Chad J. Shandler in Support of Debtors' Chapter 11 Petitions and First Day Relief [Dkt No. 14]</i>				
4.	<i>Interim Order (A) Authorizing the Debtors to Obtain Postpetition Financing, (B) Granting Liens and Providing Claims with Superpriority Administrative Expenses Status, (C) Authorizing the Use of Cash Collateral, (D) Modifying the Automatic Stay, (E) Scheduling a Final Hearing, and (F) Granting Related Relief [Dkt No. 106]</i>				
5	<i>Objection of the Official Committee of Unsecured Creditors to Final Approval of the DIP Motion [Dkt No. 346]</i>				
6.	<i>Declaration of David MacGreevey in Support of the Objection of the Official Committee of Unsecured Creditors to Final Approval of the DIP Motion [Dkt No. 349, SEALED]</i>				
7.	<i>Debtors' Responses and Objections to Official Committee of Unsecured Creditors' Notice of Rule 30(B)(6) Deposition to Modivcare Inc. and Its Debtor Affiliates in Connection with Second Day Pleadings</i>				
8.	<i>July 24, 2025 - Term Sheet Proposal, MODV 000001109 [Confidential]</i>				

EXHIBIT NO.	DESCRIPTION	OFFERED	OBJECTION	ADMITTED	DATE
9.	<i>July 14, 2025 - Capital Structure Committee Meeting Minutes MODV_000017753 [Confidential]</i>				
10.	<i>August 15, 2025 - Restructuring Term Sheet MODV_000003830 [Confidential]</i>				
11.	<i>August 8, 2025 - ModivCare Board Presentation Materials MODV_000019319 [Highly Confidential]</i>				
12.	<i>August 20, 2025 - Extended DIP Budget [Confidential]</i>				
13.	<i>August 20, 2025 - ModivCare Board Presentation Materials MODV_000018654 [Highly Confidential & Privileged]</i>				
14.	<i>August 9, 2025 - Capital Structure Committee Meeting Minutes MODV_000017768 [Confidential]</i>				
15.	<i>September 2025 - DIP Precedents MODV_000029710 [Confidential]</i>				
16.	<i>ModivCare - FTI CTO Engagement Letter MODV_000000034 [Highly Confidential]</i>				
17.	<i>July 2025 Draft Board Presentation MODV_000024357 [Confidential]</i>				
18.	<i>July 2025 Draft Board Presentation MODV_000024423 [Confidential]</i>				
19.	<i>Project Mountains - Vendor Summary [Confidential]</i>				

The Committee reserves all rights, including, without limitation, to: (i) amend and/or supplement the Exhibit List, including to add and/or remove documents at any time prior to the conclusion of the Hearing, as appropriate; (ii) use additional exhibits (a) for purposes of rebuttal, impeachment, or refreshing recollection, (b) in response to arguments, evidence, objections, filings, exhibits, or demonstratives of other parties, or (c) as a consequence of the unexpected unavailability of a witness, or a witness unexpectedly testifying; and (iii) rely upon, and use as

evidence, (a) any exhibits included on the exhibit lists of other parties and (b) any pleading, hearing transcript, order, or other document filed with the Court in these chapter 11 cases. Designation of any document on the Exhibit List does not waive any objection that the Committee may have if other parties seek to introduce into evidence any documents that the Committee has included on the Exhibit List. The Committee reserves all rights to object to any document listed on any party's exhibit list. The Committee further reserves the right to use and rely upon demonstratives. By including a document on this Exhibit List, the Committee does not agree or admit that a document or category of documents is admissible for any or all purposes or that the producing party has properly designated a document. The Committee reserves the right to object if other parties seek to introduce into evidence exhibits that the Committee has identified.

RESERVATION OF RIGHTS

The Committee reserves the right to call or introduce one or more, or none, of these witnesses or exhibits listed above. The Committee reserves the right to supplement, add to, subtract from, or otherwise amend this Witness and Exhibit List at any time prior to the conclusion of the Hearing.

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September 26, 2025
Houston, Texas

/s/ Charles R. Koster

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*Proposed Counsel for the Official Committee of
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