

**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

(JOINTLY ADMINISTERED)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

Please take notice that ROC II Fairlead Gran Park Avenues LLC ("ROC") hereby requests that all notices given or required to be given in this case and all papers served or required to be served in this case be given to and served upon:

Jacorius J. Williams (MSB No. 106581)
Attorney for ROC II Fairlead Gran Park Avenues LLC
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Please take further notice that this request includes not only the notices and papers to which the Federal Rules of Bankruptcy Procedure refer, but also includes, without limitation, Orders and Notices of all filings with respect to any application, Motion, Petition, Pleading, request Complaint or Demand, whether formal or informal, whether written, transmitted or conveyed by email, mail, delivery, telephone, telegraph, telex, telecopier, otherwise that (1) affects or seeks to affect in any way any rights or interest of any creditor or party in interest in this case including ROC with respect to: (a) the debtors; (b) property of the estate or proceeds thereof in which the debtors may claim an interest; or (c) property or proceeds thereof in the possession, custody, or control of others that



the debtors may seek to use; or (2) that requires or seeks to require any act, delivery of any property, payment or other conduct by ROC.

Please take further notice that this notice is not a submission by ROC to the jurisdiction of this Court and that neither this notice nor any later appearance, pleading, claim, or suit shall waive (1) ROC rights to have final orders in non-core matters entered only after *de novo* review by a United States District Court; (2) ROC rights to a trial by jury in any proceeding so triable in this case or any case; (3) ROC rights to have the United States District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or (4) any other rights, claims, actions, defenses, setoffs, or recoupments to which ROC is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments ROC expressly reserves.

Respectfully submitted, this 29th day of September, 2025.

ROC II FAIRLEAD GRAN PARK AVENUES LLC

BY: BALCH & BINGHAM LLP

BY: s/ Jacorius J. Williams
Of Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of September, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification to all counsel of record.

s/ Jacorius J. Williams

Of Counsel