

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

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

**NOTICE OF WITHDRAWAL OF ADMINISTRATIVE SERVICES COOPERATIVE, INC.’S
OBJECTION TO DEBTORS’ “NOTICE OF POTENTIAL ASSUMPTION OF CERTAIN OF
DEBTORS’ EXECUTORY CONTRACTS AND UNEXPIRED LEASES (DOC. 605)” (RELATED
TO DOC. NO. 736)**

Administrative Services Cooperative, Inc. (“ASC”) hereby withdraws its “Objection to Debtors’ ‘Notice of Potential Assumption of Certain Debtors’ Executory Contracts and Unexpired Leases’ [Doc. No. 605].” Said Objection was filed on November 17, 2025 at Doc. No. 736.

Dated: December 30, 2025

Respectfully submitted,

CONLEY ROSENBERG & MENDEZ P.C.

By: /s/ Phillip J. Conley

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- and -

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By: /s/Mark T. Young

MARK T. YOUNG (*pro hac vice application to be submitted*)

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Counsel for Creditor, Administrative Services Cooperative, Inc.

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’ claims and noticing agent at <https://www.veritaglobal.net/ModivCare>. Debtor ModivCare Inc.’ service address in the Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1



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PROOF OF SERVICE

I, the undersigned, declare as follows: I am over the age of 18 years. I am not a party to the within action. I am employed in Los Angeles County in the offices of a member of the bar licensed to practice before this court, to whose direction this service is made. My business address is 25152 Springfield Court, Suite 345, Valencia, California 91355.

On December 30, 2025, I served the foregoing document described as: **“NOTICE OF WITHDRAWAL OF ADMINISTRATIVE SERVICES COOPERATIVE, INC.’S OBJECTION TO DEBTORS’ ‘NOTICE OF POTENTIAL ASSUMPTION OF CERTAIN OF DEBTORS’ EXECUTORY CONTRACTS AND UNEXPIRED LEASES (DOC. 605)”** on the interested parties in this action as follows:

See attached list

☒ BY E-MAIL/ELECTRONIC TRANSMISSION: Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the documents to be sent to the persons at the email addresses listed below or on the attached service list through Zachs Legal Service. I did not receive within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☒ [State] I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on December 30, 2025, at Valencia, California.

/s/: Erin Hester

ERIN HESTER

SERVICE LIST

In re: ModivCare, Inc. et al
Case No. 25-90309

<p><i>The Debtors</i> ModivCare Inc. 6900 E. Layton Avenue Suite 1100 & 1200 Denver, CO 80237 Attn: Fai'sal Khan, and Chad Shandler Email: faisal.khan@modivcare.com, and chad.shandler@fticonsulting.com</p>	<p><i>Co-Counsel to the Debtors</i> Latham & Watkins LLP 1271 Avenue of the Americas New York, NY 10020 Attn: Ray C. Schrock, Keith A. Simon, George Klidonas, and Jonathan Weichselbaum Email: ray.schrock@lw.com, keith.simon@lw.com, george.klidonas@lw.com, and jon.weichselbaum@lw.com</p>
<p><i>Co-Counsel to the Debtors</i> Andrews Kurth LLP 600 Travis Street, Suite 4200 Houston, TX 77002 Attn: Tad Davidson, Catherine Rankin, Brandon Bell Email: taddavidson@hunton.com crankin@hunton.com, and bbell@hunton.com</p>	<p><i>Proposed Counsel to the Creditors Committee</i> White & Case LLP, 609 Main Street, Suite 2900, Houston, TX 77002, Attn: Charles Koster Email: charles.koster@whitecase.com -and- White & Case LLP, 111 South Wacker Drive, Suite 5100, Chicago, IL 60606, Attn: Gregory Pesce Email: gregory.pesce@whitecase.com -and- White & Case LLP, 1221 Avenue of the Americas, New York, NY 10020 Attn: Scott Greissman, and Andrew Zatz Email: sgreissman@whitecase.com, and azatz@whitecase.com</p>
<p><i>Counsel to the First Lien Agent, the Consenting Creditors, and the DIP Lenders</i> Paul Hastings LLP 200 Park Avenue New York, NY 10166 Attn: Kris Hansen, Email: krishansen@paulhastings.com</p>	<p><i>Office of the United States Trustee for Region 7</i> 515 Rusk Street, Suite 3516 Houston, TX 77002 Attn: Jana Whitworth Email: jana.whitworth@usdoj.gov</p>
<p>-and- Paul Hastings LLP 71 South Wacker Drive, Suite 4500 Chicago, IL 60606 Attn: Matt Warren, and * Lindsey Henrikson Email: mattwarren@paulhastings.com, and lindsey.henrikson@paulhastings.com</p>	