

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

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

NOTICE OF EMERGENCY VIRTUAL HEARING ON FIRST DAY MOTIONS

On August 20, 2025 (the “*Petition Date*”), ModivCare, Inc. and its debtor affiliates, as debtors and debtors in possession (collectively, the “*Debtors*”), filed voluntary petitions for relief under title 11 of the United States Code (the “*Bankruptcy Code*”) in the United States Bankruptcy Court for the Southern District of Texas, Houston Division (the “*Court*”) commencing the Chapter 11 Cases.

In accordance with the Procedures for Complex Cases in the Southern District of Texas, an emergency, virtual hearing is set for **August 21, 2025 at 2:30 p.m. (Prevailing Central Time)** (the “*First Day Hearing*”), before the Honorable Alfredo Pérez to consider the matters (collectively, the “*First Day Motions*”) set forth below.

The First Day Hearing will be conducted **virtually only**. **No in-person attendance will be permitted.** Audio communication will be by use of the Court’s dial-in-facility. You may access the facility at (832) 917-1510. Once connected, you will be asked to enter the conference room number. Judge Pérez’s conference room number is 282694. Video communication will be by the use of the GoToMeeting platform. Connect via the free GoToMeeting application or click the link on Judge Pérez’s home page. The meeting code is “JudgePerez”. Click the settings icon in the upper right corner and enter your name under the personal information setting.

Hearing appearances must be made electronically in advance of the hearing. To make your electronic appearance, click the “Electronic Appearance” link on Judge Pérez’s home page. Select the case name, complete the required fields and click “Submit” to complete your appearance.

All documents filed in the Chapter 11 Cases, including the First Day Motions, and other relevant case information are available free of charge on the following website maintained by the Debtors’ proposed claims, balloting, and noticing agent, Kurtzman Carson Consultants, LLC dba

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.



2590309250821000000000002

Verita Global in connection with the Chapter 11 Cases: <https://www.veritaglobal.net/ModivCare>. Copies of any pleadings or papers filed with the Court may also be obtained by visiting the Court's website at <https://ecf.txsb.uscourts.gov> in accordance with the procedures and fees set forth therein.

First Day Motions:

1. ***Complex Case Designation.*** Notice of Designation as Complex Bankruptcy Case [Docket No. 2]
2. ***Joint Administration Motion.*** Emergency Motion of Debtors for an Order Directing Joint Administration of Chapter 11 Cases [Docket No. 21]
3. ***Creditor Matrix Motion.*** Emergency Motion of Debtors for Entry of 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]
4. ***Claims, Noticing, and Solicitation Agent Retention Application.*** Debtors' Emergency *Ex Parte* Application for Entry of an Order Authorizing the Employment and Retention of Kurtzman Carson Consultants, LLC dba Verita Global as Claims, Noticing, and Solicitation Agent [Docket No. 3]
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]
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]
7. ***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]
8. ***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]
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]

10. ***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]
11. ***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]
12. ***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]
13. ***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]
14. ***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]
15. ***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]

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]

Dated: August 21, 2025

Respectfully submitted,

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

HUNTON ANDREWS KURTH LLP

Timothy A. ("Tad") Davidson II (Texas Bar No. 24012503)

Catherine A. Rankin (Texas Bar No. 24109810)

Brandon Bell (Texas Bar No. 24127019)

600 Travis Street, Suite 4200

Houston, TX 77002

Telephone: (713) 220-4200

Email: taddavidson@hunton.com

catherinerankin@hunton.com

bbell@hunton.com

-and-

LATHAM & WATKINS LLP

Ray C. Schrock (NY Bar No. 4860631)

Keith A. Simon (NY Bar No. 4636007)

George Klidonas (NY Bar No. 4549432)

Jonathan J. Weichselbaum (NY Bar No. 5676143)

1271 Avenue of the Americas

New York, NY 10020

Telephone: (212) 906-1200

Email: ray.schrock@lw.com

keith.simon@lw.com

george.klidonas@lw.com

jon.weichselbaum@lw.com

*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
Timothy A. ("Tad") Davidson II