

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

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In re: : Chapter 11
MODIVCARE INC., *et al.*, : Case No. 25-90309 (ARP)
Debtors.¹ : (Jointly Administered)
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**NOTICE OF HEARING TO CONSIDER APPROVAL OF THE DISCLOSURE
STATEMENT FOR JOINT CHAPTER 11 PLAN OF REORGANIZATION OF
MODIVCARE INC. AND ITS DEBTOR AFFILIATES**

PLEASE TAKE NOTICE that, a hearing will be held on the *Emergency Motion of Debtors for Entry of an Order (A) Approving Disclosure Statement; (B) Scheduling Confirmation Hearing; (C) Establishing Related Objection and Voting Deadlines; (D) Approving Related Solicitation Procedures, Ballots, and Release Opt-Out Form, and Form and Manner of Notice; (E) Approving Procedures for Assumption of Executory Contracts and Unexpired Leases; (F) Approving Equity Rights Offering Procedures and Related Materials; and (G) Granting Related Relief* [Docket No. 122] (the “**Motion**”) seeking approval of the *Disclosure Statement for Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and its Debtor Affiliates* [Docket No. 120] (the “**Disclosure Statement**”) before the Honorable Alfredo R. Pérez, Courtroom 400, 4th floor, 515 Rusk Street, Houston, Texas 77002, on **October 6, 2025, at 9:00 a.m. (prevailing Central Time)** (the “**Disclosure Statement Hearing**”).

Objections or other responses to the Motion must (a) be in writing; (b) conform to the Bankruptcy Rules, the Bankruptcy Local Rules, and the Complex Case Procedures; (c) state with particularity the legal and factual basis for the objection; and (d) be filed with the Court and served so as to be **actually received** on or before **September 29, 2025, at 4:00 p.m. (prevailing Central Time)** and served on the following parties:

- a. ModivCare Inc., 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, CO 80237, Attn: Faisal Khan (faisal.khan@modivcare.com) and Chad Shandler (chad.shandler@fticonsulting.com);
- b. proposed co-counsel to the Debtors, (i) Latham & Watkins LLP, 1271 Avenue of the Americas New York, NY 10020, Attn: Ray C. Schrock (ray.schrock@lw.com); Keith A. Simon (keith.simon@lw.com); George Klidonas

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 the Chapter 11 Cases is 6900 E. Layton Avenue, Suite 1100 & 1200, Denver, Colorado 80237.



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(george.klidonas@lw.com); and Jonathan Weichselbaum (jon.weichselbaum@lw.com); and (ii) Hunton Andrews Kurth LLP, 600 Travis, Suite 4200, Houston, Texas 77002, Attn: Tad Davidson (taddavidson@hunton.com), Catherine Rankin (crankin@hunton.com), and Brandon Bell (bbell@hunton.com);

- c. counsel for the Prepetition First Lien Agent, Consenting Creditors, and DIP Lenders, (i) Paul Hastings LLP, 200 Park Avenue, New York, NY 10166, Attn: Kris Hansen (krishansen@paulhastings.com; and (ii) Paul Hastings LLP 71 South Wacker Drive, Chicago, IL 60606, Attn: Matt Warren (mattwarren@paulhastings.com) and Lindsey Henrikson (lindseyhenrikson@paulhastings.com);
- d. the U.S. Trustee, 515 Rusk Street, Suite 3516, Houston, TX 77002, Attn: Jana Whitworth (jana.whitworth@usdoj.gov); and
- b. counsel to any statutory creditors' committee appointed in the Chapter 11 Cases.

You may attend the Disclosure Statement Hearing either in person or by audio/video communication. 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. You should download the free GoToMeeting application on each device that will be used to connect to the hearing. If you choose to connect via a web browser, available literature suggests that Chrome is the preferred browser. Please note that connecting through a browser may limit the availability of some GoToMeeting features. To connect to the hearing, you should enter the meeting code "JudgePerez". You can also connect using the link on Judge Pérez's homepage on the Southern District of Texas website. Once connected to GoToMeeting, click the settings icon in the upper right corner and enter your name under the personal information setting. In any event, audio for the Disclosure Statement Hearing will only be available by using the Court's regular dial-in number noted above.

Disclosure Statement 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 with the Court in connection with the above-captioned Chapter 11 Cases, including the Solicitation Procedures Order, the Disclosure Statement, and the Plan may be obtained free of charge by visiting the solicitation website maintained by the Debtors' balloting and solicitation agent, Kurtzman Carson Consultants, LLC (d/b/a Verita Global) (the "**Solicitation Agent**"), at <https://www.veritaglobal.net/ModivCare>. Copies of the Plan and Disclosure Statement may also be obtained by calling the Solicitation Agent at (888) 733-1521 (U.S./Canada) or +1 (310) 751-2636 (International), or by submitting an inquiry at

<https://www.veritaglobal.net/ModivCare/Inquiry>. You may also obtain these documents and any other pleadings filed in the Debtors' Chapter 11 Cases (for a fee) at: www.tx.uscourts.gov.

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Dated: September 4, 2025
Houston, Texas

Respectfully submitted,

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

HUNTON ANDREWS KURTH LLP

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*Proposed Co-Counsel for the Debtors
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