

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

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

**AGENDA OF DEBTORS FOR MATTERS  
SET FOR HEARING ON SEPTEMBER 30, 2025**

The debtors and debtors in possession in the above-captioned cases (collectively, the “*Debtors*”) file this Agenda of matters set for hearing on **September 30, 2025, at 3:00 p.m.** (prevailing Central Time).

**A. Matters Set For Hearing.**

1. ***DIP Financing 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].

**Status:**

This matter is going forward on a contested basis. The Debtors will seek entry of the Proposed Final Order at Docket No. 385.

**Objections/Responses:**

- A. ***Committee’s Objection.*** Objection of the Official Committee of Unsecured Creditors to Final Approval of the DIP Motion [Docket No. 346];

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<sup>1</sup> 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://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.



**B. *Debtors' Reply.*** Debtors' Reply to Objection of the Official Committee of Unsecured Creditors to Final Approval of the DIP Motion [Docket No. 377]; and

**C. *DIP Agent's Reply.*** Reply of DIP Agent, DIP Lenders, and Consenting Creditors in Support of the Emergency Motion of the Debtors For Entry of a Final Order (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. 378].

2. ***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 (III) Continue Intercompany Transactions; and (B) Granting Related Relief [Docket No. 16].

**Status:** This matter has been resolved by the Court's entry of the Final Order [Docket No. 388] granting the relief sought in the Cash Management Motion on a final basis.

3. ***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].

**Status:** This matter is going forward on an uncontested basis. No formal objection was filed to the entry of a final order granting the relief sought in this motion, but the Committee provided certain informal comments to the proposed final order granting the relief sought in this motion. The Debtors incorporated the Committee's comments and filed a certificate of no objection with respect to this motion [Docket No. 376] (the "*CV CNO*"). Accordingly, the Debtors respectfully request the Court's entry of the Revised Proposed Final Order appended to the CV CNO at Docket No. 376-1.

## **B. 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. ***Jamal DIP Financing Declaration (Debtors).*** Declaration of Zul Jamal in Support of the Debtors' Motion to Obtain Postpetition Debtor-in-Possession Financing [Docket No. 12].

3. ***Shandler DIP Financing Declaration (Debtors).*** Declaration of Chad Shandler in Support of the Debtors' Motion to Obtain Postpetition Debtor-in-Possession Financing [Docket No. 42-23].
4. ***Notice of Intent to Adduce Remote Testimony.*** Notice of Intent to Adduce Testimony from a Remote Location by Telephone and Video Technology [Docket No. 348].
5. ***MacGreevey Declaration (Committee).*** Declaration of David MacGreevey in Support of the Objection of the Official Committee of Unsecured Creditors to Final Approval of the DIP Motion [Docket No. 349].
6. ***Certificate of No Objection Regarding Cash Management Motion.*** Certificate of No Objection Regarding 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 (III) Continue Intercompany Transactions; and (B) Granting Related Relief [Docket No. 361].
7. ***Debtors' Witness and Exhibit List*** [Docket No. 364].<sup>2</sup>
8. ***Committee's Witness and Exhibit List*** [Docket No. 370].
9. ***Committee's Witness and Exhibit List*** [Docket No. 372].<sup>3</sup>
10. ***Certificate of No Objection Regarding Critical Vendors Motion.*** Certificate of No Objection Regarding 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. 376].
11. ***DIP Agent's Witness and Exhibit List*** [Docket No. 379].
12. ***Revised Proposed Final DIP Order*** [Docket No. 385].
13. ***Final Cash Management Order.*** Final Order (A) Authorizing Debtors to (I) Continue Existing Cash Management System, (II) Maintain Existing Business Forms, and (III) Continue Intercompany Transactions; and (B) Granting Related Relief [Docket No. 388].

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<sup>2</sup> The Debtors' Witness and Exhibit List filed at Docket No. 364 was filed under seal, but the exhibits that were not filed under seal are publicly-available on the Debtors' Witness and Exhibit List filed at Docket No. 366.

<sup>3</sup> The Committee's Witness and Exhibit List filed at Docket No. 372 includes those exhibits filed under seal in connection with the Committee's Witness and Exhibit List filed at Docket No. 370, the Committee's other exhibits were publicly-filed on the Witness and Exhibit List filed at Docket No. 370.

Dated: September 29, 2025

Respectfully submitted,

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

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*Proposed Attorneys for the Debtors  
and Debtors in Possession*

**CERTIFICATE OF SERVICE**

I certify that on September 29, 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