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

In re:	:	Chapter 11
MODIVCARE INC., *et al.*,	:	Case No. 25-90309 (ARP)
Reorganized Debtors.[1]	:	(Jointly Administered)

FIFTH NOTICE REGARDING THE STATUS OF VARIOUS CURE OBJECTIONS
[Relates to Docket Nos. 605, 1055, 1206, 1328, 1399, & 1500]

PLEASE TAKE NOTICE THAT, on October 30, 2025, the Reorganized Debtors[2] filed the *Notice of Potential Assumption of Certain of Debtors' Executory Contracts and Unexpired Leases* [Docket No. 605] (the "***Cure Notice***") listing certain executory contracts and unexpired leases (those executory contracts and unexpired leases identified on the Cure Notice, collectively, the "***Potentially Assumed Contracts***"), and their respective Proposed Cures, that the Reorganized Debtors intended to assume as part of the Chapter 11 Cases.

PLEASE TAKE FURTHER NOTICE THAT, the deadline for the counterparties to the Potentially Assumed Contracts (the ***"Counterparties***") to file an objection to the assumption of the Potentially Assumed Contracts or the Proposed Cures for such Potentially Assumed Contracts was November 17, 2025 (the "***Objection Deadline***"). The Reorganized Debtors subsequently agreed with Global Medical Response Inc. and certain of its affiliates ("***GMR***") to extend GMR's Objection Deadline until December 5, 2025.

PLEASE TAKE FURTHER NOTICE THAT, on December 5, 2025, GMR filed *Global Medical Response, Inc.'s Objection to the Debtors' Notice of Cure Amount* [Docket No. 948] ("***GMR's Cure Objection***") prior to the applicable Objection Deadline and the Reorganized Debtors filed the *Second Amended Joint Chapter 11 Plan of Reorganization of ModivCare Inc. and Its Debtor Affiliates* [Docket No. 959] (the "***Plan***").

PLEASE TAKE FURTHER NOTICE THAT, on December 15, 2025, the Court entered the *Order (I) Confirming Second Amended Joint Chapter 11 Plan of Reorganization of*

[1] A complete list of each of the Reorganized Debtors in these Chapter 11 Cases (the "***Chapter 11 Cases***") and the last four digits of each Reorganized Debtor's taxpayer identification number (if applicable) may be obtained on the website of the Reorganized Debtors' 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 1200, Denver, Colorado 80237.

[2] Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Cure Notice or the Confirmation Order, as applicable.

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ModivCare Inc. and Its Debtor Affiliates and (II) Denying Motions of Official Committee of Unsecured Creditors for Leave, Derivative Standing, and Authority to Commence and Prosecute Certain Causes of Action on Behalf of Debtors' Estates [Docket No. 1055] (the "***Confirmation Order***"). The Confirmation Order provides that the Reorganized Debtors must file a notice of dispute with the Court (and promptly serve such notice on the applicable counterparty) by January 28, 2026, if any dispute regarding the assumption, or assumption and assignment, of the Potentially Assumed Contracts, including, without limitation, the Proposed Cure or the applicable Reorganized Debtor's ability to provide adequate assurance of future performance, could not be resolved consensually the applicable parties. *See* Confirmation Order ¶ 36.

PLEASE TAKE FURTHER NOTICE THAT, on January 28, 2026, the Reorganized Debtors filed the *Notice Regarding the Status of Various Cure Objections* [Docket No. 1206], on February 27, 2026, the Reorganized Debtors filed the *Second Notice Regarding the Status of Various Cure Objections* [Docket No. 1328], on March 31, 2026, the Reorganized Debtors filed the *Third Notice Regarding the Status of Various Cure Objections* [Docket No. 1399], and on April 30, 2026, the Reorganized Debtors filed the *Fourth Notice Regarding Status of Various Cure Objections* [Docket No. 1500] (the "***Fourth Cure Status Notice***").

The Fourth Cure Status Notice provided that if the Reorganized Debtors could not reach a consensual resolution with GMR, the Reorganized Debtors would file a supplemental notice providing the Court with a further update as to the status of GMR's Cure Objection by May 31, 2026, and reach out to the Court to set a hearing to resolve GMR's Cure Objection unless GMR agreed to a further extension of the deadline to reach a consensual resolution.

In accordance with the Fourth Cure Status Notice, the Reorganized Debtors hereby advise the Court and parties in interest that, as of the date hereof, the Reorganized Debtors and GMR continue to have productive discussions regarding a resolution of GMR's Cure Objection, and, as such, have agreed to continue engaging in negotiations regarding a consensual resolution, rather than seeking a hearing before the Court at this juncture. In the event the Reorganized Debtors and GMR cannot reach a consensual resolution by June 30, 2026, the Reorganized Debtors will (a) file a notice (a "***Supplemental Cure Status Notice***") providing the Court a further update as to the status of GMR's Cure Objection and (b) reach out to the Court to set a hearing on GMR's Cure Objection unless GMR agrees to continue engaging on a consensual resolution for additional time prior to seeking a hearing before the Court.

The Reorganized Debtors have discussed this notice with GMR and shall ensure GMR is served with a copy of this Notice.

This notice shall not be deemed or construed as (a) a promise by the Reorganized Debtors to seek the assumption of the applicable Designated Contract(s), (b) a limitation or waiver on the Reorganized Debtors' ability to seek to reject any applicable Designated Contract, or (c) an admission that any applicable Designated Contract is, in fact, an executory contract or unexpired lease under section 365 of the Bankruptcy Code. Moreover, the Reorganized Debtors explicitly reserve their rights, in their sole discretion, to assume or reject each Designated Contract set forth on the Cure Notice pursuant to section 365(a) of the Bankruptcy Code and nothing herein (x) alters in any way the prepetition nature of the contracts and leases

or the validity, priority, or amount of any claims that a Counterparty may hold against the Reorganized Debtors that under such Designated Contract, (y) creates a postpetition contract or agreement, or (z) elevates to administrative expense priority any claims of a counterparty to a Designated Contract against the Reorganized Debtors that may arise under such Designated Contract. The Reorganized Debtors reserve all their rights, claims, and causes of action with respect to the contracts, leases and other agreements associated with GMR.

All documents filed with the Court in connection with the above-captioned Chapter 11 Cases, including the Plan, the Cure Notice, and the Confirmation Order may be obtained free of charge by visiting the solicitation website maintained by the Reorganized Debtors' balloting and solicitation agent, Kurtzman Carson Consultants, LLC (d/b/a Verita Global), 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 submitting an inquiry at https://www.veritaglobal.net/ModivCare/Inquiry. You may also obtain these documents and any other pleadings filed in the Reorganized Debtors' Chapter 11 Cases (for a fee) at: www.txs.uscourts.gov.

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Dated: May 29, 2026
Houston, Texas

Respectfully submitted,

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

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Co-Counsel for the Reorganized Debtors

CERTIFICATE OF SERVICE

I certify that on May 29, 2026, 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
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